

NO. C-1-PB-14-001245

In Re: § **In the Probate Court No. 1**
 §
 § **of**
 §
TEL Offshore Trust § **Travis County, Texas**

Original Answer Of Attorney Ad Litem

This original answer is filed by Glenn M. Karisch, who has been appointed attorney ad litem by this Court to represent the interests of the unit holders of TEL Offshore Trust who were served by publication and did not answer or appear in this proceeding (collectively referred to as the "Defendants"), for the purpose of representing and protecting their interests in this cause.

On behalf of the Defendants, I deny all of the allegations contained in the Original Petition for Modification and Termination of Trust (the "Petition") filed by The Bank of New York Mellon Trust Company, N. A., as corporate trustee, and Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr., as individual trustees (collectively referred to as the "Trustees") and demand that the Trustees be required to prove the allegations of the Petition in accordance with law.

On behalf of the Defendants, I pray that the relief sought in the Petition be denied, that I be allowed a reasonable fee for services and reimbursement of my costs and expenses, that the Defendants recover costs, and for such other and further relief to which Defendants justly may be entitled.

Respectfully submitted,

THE KARISCH LAW FIRM, PLLC

By: /s/ Glenn M. Karisch

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon counsel of record pursuant to the Texas Rules of Civil Procedure on this the 18th day of August 2015.

The following were served by efile:

Party	Name	Attorney
Defendant	Amador, Albert	Pro Se
Other	Clark, Sarah	
Defendant	Di Simone, Ralph	Pro Se
Other	Dunn, M. Kaylan	
Petitioner	Evans, Gary C. - Individual Trustee	
Defendant	Foran, Joseph William	James Truss
Defendant	Foran, Nancy	James Truss
Defendant	Foster, Jane	John Strong
Defendant	Hollowell, Catherine, Julia	Sarah Horton
Defendant	Hollowell, Don W.	Sarah Horton
Petitioner	Lucier, Georgia	
Defendant	Lutz, Matt	Sara Clark
Defendant	Mundt, Randolph P.	
Defendant	Nishimura, Akihiro	Pro Se
Defendant	O'Neil, Nancy - Trustee	Pro Se
Other	O'Neil, Nancy - Trustee	
Petitioner	Owen, Thomas H., Jr. - Individual Trustee	
Defendant	Piazza, Pascal	Pascal Piazza
Defendant	Robertson, Benjamin	Nancy Foran
Defendant	Romberg, Vincent George	Leonard Peters
Other	Sifuentes, Jessica	
Defendant	Sinkin, Steven	Steven Sinkin
Other	Stephens, Inc.	Jana Fowler
Petitioner	Swanson, Jeffrey S. - Individual Trustee	
Defendant	Ten, Joyce Umali Tan	
Petitioner	The Bank of New York Mellon Trust Company, N.S. as Corporate Trustee	
Defendant	Truss, James M.	Nancy Foran
Defendant	Wendeborn, J.C.	
Defendant	Williams, Donald L.	Pro Se
Defendant	Winkelmann, Arlene L.	Brent Devere
Defendant	Winkelmann, Ray E.	Brent Devere

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