

5. The Agreement will give potential buyers of the Overriding Royalty Interest additional time to evaluate the sale and could have a positive impact on the sale proceeds.

6. “The only limit on a trial court’s authority to enforce its judgment is that enforcement orders must not be inconsistent with the original judgment and must not constitute a ‘material change in substantial adjudicated portions of the judgment.’” *Black v. Shor*, 443 S.W.3d 170, 176 (Tex. App.—Corpus Christi 2013, pet. denied) (quoting *Matz v. Bennion*, 961 S.W.2d 445, 452 (Tex. App.—Houston [1st Dist.] 1997, writ denied). The Agreement aids in the enforcement of the Judgment and the Agreement is not inconsistent with the Judgment nor does it materially change a part of the Judgment that was substantially adjudicated.

WHEREFORE PREMISES CONSIDERED, the Trustees request the Court to grant the Motion to Enforce Judgment Pursuant to Agreement and enter an order extending the deadline for the sale of the Overriding Royalty Interest until June 30, 2016, and for such other and further relief to which they may be entitled.

Respectfully submitted,

ANDREWS KURTH LLP

By: /s/ Georgia L. Lucier
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ATTORNEYS FOR TRUSTEES THE BANK
OF NEW YORK MELLON TRUST
COMPANY, GARY C. EVANS, JEFFREY S.
SWANSON, and THOMAS H. OWEN, JR.

CERTIFICATE OF CONFERENCE

There are currently over 120 defendant unit holders active in this case. Conferring with each of these defendants about this Motion would have been impractical.

/s/ Georgia L. Lucier
Georgia L. Lucier

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 15th day of April, 2016.

The following were served by efile:

Party	Name	Attorney
Ad Litem	Attorney Ad Litem	Glenn Karish
Defendant	Foran, Joseph William	James Truss
Defendant	Foran, Nancy	James Truss
Defendant	Lutz, Matt	Sara Clark
Defendant	O'Neil, Nancy - Trustee	Pro Se
Defendant	Piazza, Pascal	Pascal Piazza
Defendant	Robertson, Benjamin	Nancy Foran
Defendant	RNR Production Land and Cattle	Shannon Ratliff
Other	Sifuentes, Jessica	Pro Se

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Donald Williams & Joyce Umali Tan c/o Donald E. Bird 4807 Spicewood Springs Rd. Bldg. 2, Suite 117 Austin, TX 78759-8444	Ralph and Ida DiSimone c/o Donald E. Bird 4807 Spicewood Springs Rd. Bldg. 2, Suite 117 Austin, TX 78759	Mark L. Blumenfeld 461 South Main St., Suite 200 Willits, CA 95490
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John Campbell 288 River Drive Tequesta, FL 33469	William B. Campbell 175 Big Hat Road Basalt, CO 81621-9778	Larry J. Canuti 12560 Eleventh Avenue Victorville, CA 92395
Raymond and Elida Canziani 18 Clorinda Avenue San Rafael, CA 94901	Carolyn and Enrique Chavez 15785 Westcott Dr. Southgate, MI 48195-3020	Viola M. Chesebrough P. O. Box 1695 Deming, NM 88031-1695
Justyna B. Clipper P. O. Box 3138 Sarasota, FL 34230	Dan Corley 7422 Bull Creek Rd. Houston, TX 77095-3310	Luke M. Cornelius 302 4th Street Atlantic Beach, FL 32233-5344
Luke M. Cornelius 320 4th Street Atlantic Beach, FL 32233-5344	Tommy R. Coy 12731 W. Paintbrush Drive Sun City West, AZ 85375	Benjamin Flint III c/o Douglass S. Davert Davert & Loe, Lawyers 110 Pine Avenue, Suite 600 Long Beach, CA 90802
Benjamin DeScala 606 E. Jacksonville Ave. Villas, NJ 08251-2919	Anton Dimitrov 15542 Walkwood Drive Houston, TX 77079	Mechele Kay Dorsey 8022 Doe Meadow Drive Austin, Texas 78749
Emil C. Dragan 2302 Nautilus CV Fort Wayne, IN 46814-8940	[blank]	Jeanette Eid 12908 Viking Drive Burnsville, MN 55337
Shirley A. Engelbart 3493 Prarie Bend Circle Marion, IA 52302	Val and Lou Episcopo 4500 East Palm Valley Blvd. Suite 108-59 Round Rock, Texas 78665-2663	Louis H. Gall c/o Paul J. Ferr 5232 W. Oklahoma Ave., Ste 100 Milwaukee, Wisconsin 53219
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William B. and Ruth Frye 4659 Ipswich Street Boulder, CO 80301-4218	Sharon Gale 9838 E. Diamond Drive Chandler, AZ 85248	Janet Gargano 975 Chadwick Shores Drive Sneads Ferry, NC 28460-9213

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Colleen B. Halloran 1230 Luneta Drive Del Mar, California 92014	Alfred S. and Adele N. Harris 3355 Bay Front Drive Baldwin, NY 11510	Laurence and Joyce F. Harter 106 Sakonnet Trail Pinehurst, NC 28374
Noel A. Hatch 19144 Superior Drive Twain Harte, CA 95383-9683	Roberta J. Hauck 107 Lea Wood Ct. Madison, AL 35758	Shirley A. Hijar 5015 Newton Street Denver, Colorado 80221-1041
David Ho 4406 Sweet Stone Pl Las Vegas, NV 89147	John Hodge 302 Willowbrook Dr. N Brunswick, NJ 08902-1259	Acilla Holstrom 12121 E. Clinton Scottsdale, AZ 85259
Herbert and Jacqueline E. Hymel 119 New Orleans Avenue Lake Arthur, LA 70549-4629	The Estate of William H. James Virginia James 373 Reeds Gap Rd. Northford, CT 06472	The Estate of William H. James c/o William S. Colwell Parrett, Porto, Parese & Colwell 2319 Whitney Ave., Suite 1D Hamden, CT 06518
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Herman Lambert 10565 Cedar Valley Dr Davisburg, MI 48350-1106	Lois Liggett 15 North Park Drive Montpelier, Vermont 05602	Randall and Carol Johnson Loemker 2190 Wolverton Trail Prescott, AZ 86303
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[blank]	Edna Long Morgan 18 Beechnut Lane Gordonsville, VA 22942	Richard E. Moyer 30915 NE Bell Road Sherwood, OR 97140
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<p>Sandra Samkavitz c/o Robert J. Reilley, Jr. Pizonka Reilley Bello & McGrory 144 East DeKalb Pike, Suite 300 King of Prussia, PA 19406</p>	<p>Dianne M. Ricks 8530 Oak Point Way Fairfax Station, VA 22039</p>	<p>George E. Ronnquist 2150 S State College Blvd. Apt. 2065 Anaheim, CA 92806</p>
<p>Charles Rose 260 Locust Grove Rd. Warfordsburg, PA 17267</p>	<p>Robert B. Rusin 433 Swan Blvd. Deerfield, IL 60015-3672</p>	<p>Joan E. and Sedg J. Scammon 5857 Candover Rd. Loves Park, IL 61111</p>
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<p>Paul Ames Waterman P. O. Box 18301 Minneapolis, MN 55418-0301</p>	<p>Whitney Watts 725 Wallingford Rd. Cheshire, CT 06410-2914</p>	<p>Cheryl J. Wedemeyer 824 Hemlock Drive Oxford, MI 48370-2717</p>

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Phyllis F. Zorn 4015 Beech Cove Lane Vinton, VA 24179	Amador, Albert 7 Old Ox Road Nyack, NY 10960-2709	Ray and Arlene Winkelmann c/o Brent Devere 1411 West Ave., Suite 200 Austin, TX 78701
JC Wendeborn c/o Colton Johnson PO Box 2169 Albany, TX 76430		

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Yablon, Gilbert	gilbert@lumeni.com

/s/Georgia L. Lucier _____

Georgia L. Lucier

EXHIBIT A

April 14, 2016

Via E-mail

Shannon H. Ratliff
Ratliff Law Firm PLLC
600 Congress Avenue, Suite 3100
Austin, TX 78701-2984

Glenn M. Karisch
The Karisch Law Firm, PLLC
301 Congress Avenue, Suite 1910
Austin, Texas 78701

RULE 11 AGREEMENT

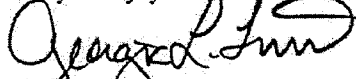
Re: *In Re Tel Offshore Trust*; Cause No. C-1-PB-14-001245; In the Probate Court of
Travis County, Texas.

Dear Counsel:

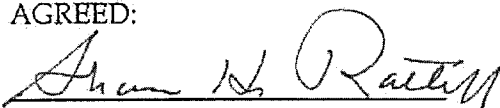
This letter confirms that we have agreed to extend the deadline to conduct the sale of the Overriding Royalty Interest to June 30, 2016. By extending the deadline, we are giving potential buyers additional time to evaluate the sale and thus this could have a positive impact on the sale proceeds.

If this accurately reflects our agreement, please sign below and return to me for filing with the Court.

Very truly yours,


Georgia L. Lucier

AGREED:


Shannon H. Ratliff

Glenn M. Karisch

ANDREWS
ATTORNEYS KURTH LLP

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andrewskurth.com

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April 14, 2016

Via E-mail

Shannon H. Ratliff
Ratliff Law Firm PLLC
600 Congress Avenue, Suite 3100
Austin, TX 78701-2984

Glenn M. Karisch
The Karisch Law Firm, PLLC
301 Congress Avenue, Suite 1910
Austin, Texas 78701

RULE 11 AGREEMENT

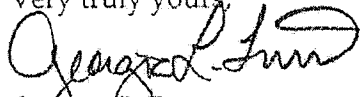
Re: *In Re Tel Offshore Trust*; Cause No. C-1-PB-14-001245; In the Probate Court of Travis County, Texas.

Dear Counsel:

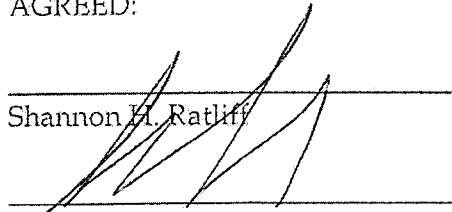
This letter confirms that we have agreed to extend the deadline to conduct the sale of the Overriding Royalty Interest to June 30, 2016. By extending the deadline, we are giving potential buyers additional time to evaluate the sale and thus this could have a positive impact on the sale proceeds.

If this accurately reflects our agreement, please sign below and return to me for filing with the Court.

Very truly yours,


Georgia L. Lucier

AGREED:



Shannon H. Ratliff

Glenn M. Karisch

CAUSE NO. C-1-PB-16-000096

IN RE:	§	IN THE PROBATE COURT
	§	
	§	OF
	§	
TEL OFFSHORE TRUST	§	TRAVIS COUNTY, TEXAS

ORDER ON MOTION TO ENFORCE JUDGMENT PURSUANT TO AGREEMENT

On today's date, the Court considered The Bank of New York Mellon Trust Company, N.A.'s ("BONY"), as Corporate Trustee, and Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr.'s, as Individual Trustees (collectively "Trustees") of the TEL Offshore Trust ("Trust"), Motion to Enforce Judgment Pursuant to Agreement, and the Court hereby GRANTS the Motion as follows:

The Court finds:

1. that the April 14, 2016, agreement between the Trustees, RNR Production Land and Cattle Company, Inc. and Glenn M. Karisch (the "Agreement") aids in the enforcement of the Court's Final Judgment and Order dated January 15, 2016; and
2. that the Agreement's extension of the deadline to sell the Overriding Royalty Interest to June 30, 2016, is not inconsistent with the Judgment nor does it materially change a part of the Judgment that was substantially adjudicated.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that:

1. The sale of the Overriding Royalty Interest shall be conducted on or before June 30, 2016.

SIGNED this ____ day of _____, 2016.

JUDGE PRESIDING

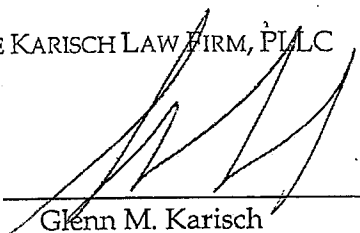
APPROVED AS TO FORM AND SUBSTANCE:

ANDREWS KURTH LLP

By: Georgia L. Lucier *signed by permission*
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COMPANY, N.A., GARY C. EVANS,
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ATTORNEY AD LITEM

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ATTORNEY FOR DEFENDANT
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