

NO. C-1-PB-14-001245

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

ATTORNEY AD LITEM'S REQUEST FOR DISCLOSURE TO PLAINTIFFS

TO: Plaintiffs, The Bank of New York Mellon Trust Company, N. A., Gary C. Evans, Jeffrey S. Swanson, and Thomas H. Owen, Jr., by and through their attorney of record, Georgia L. Lucier, Andrews Kurth LLP, 600 Travis, Suite 4200, Houston, Texas 77002

Pursuant to Rule 194, you are requested to disclose, within thirty (30) days of service of this request, the information or material described in Rule 194.2 (a – i and l), as follows.

REQUEST FOR DISCLOSURE (a):

The correct names of the parties to the lawsuit.

RESPONSE:

REQUEST FOR DISCLOSURE (b):

The name, address, and telephone number of any potential parties.

RESPONSE:

REQUEST FOR DISCLOSURE (c):

The legal theories and, in general, the factual bases of Respondents' claims or defenses.

RESPONSE:

REQUEST FOR DISCLOSURE (d):

The amount and any method of calculating economic damages.

RESPONSE:

REQUEST FOR DISCLOSURE (e):

The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

RESPONSE:

REQUEST FOR DISCLOSURE (f):

For any testifying expert:

- (1) the expert's name, address, and telephone number;
- (2) the subject matter on which the expert will testify;
- (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to your control, documents reflecting such information;
- (4) if the expert is retained by, employed by, or otherwise subject to your control:
 - (A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
 - (B) the expert's current resume and bibliography.

RESPONSE:

REQUEST FOR DISCLOSURE (g):

Any discoverable indemnity and insuring agreements described in Rule 192.3(f).

RESPONSE:

REQUEST FOR DISCLOSURE (h):

Any discoverable settlement agreements described in Rule 192.3(g).

RESPONSE:

REQUEST FOR DISCLOSURE (i):

Any discoverable witness statements described in Rule 192.3(h).

RESPONSE:

REQUEST FOR DISCLOSURE (1):

The name, address and telephone number of any person who may be designated as a responsible third party.

RESPONSE:

Respectfully submitted,

THE KARISCH LAW FIRM, PLLC

By: /s/ Glenn M. Karisch

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ATTORNEY AD LITEM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Attorney Ad Litem's Request For Disclosure Documents To Plaintiffs has been served on Plaintiffs' counsel on March 18, 2016, and will be served on or about March 21, 2016, in accordance with the Court's Order Directing the Method of Service of Documents dated September 28, 2015, and Order Directing Method of Service dated January 21, 2016.

/s/ Glenn M. Karisch
Glenn M. Karisch