

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiffs' Answers and Objections to Attorney Ad Litem's First Set of Interrogatories has been served on Attorney Ad Litem Glenn M. Karisch on April 19, 2016, and upon the other interest parties in this matter 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/ Georgia L. Lucier

Georgia L. Lucier

**PLAINTIFFS' ANSWERS AND OBJECTIONS TO
ATTORNEY AD LITEM'S FIRST SET OF INTERROGATORIES**

INTERROGATORY NO. 1: For each year in the Relevant Period please describe the type, amount and basis for all compensation paid to the Trustees.

RESPONSE:

Plaintiffs object that this Interrogatory is vague and unclear. Specifically the terms "type" and "basis" are not defined and the Trustees do not understand what is being requested.

Subject to and without waiving the foregoing, the Trustees have received the following compensation for serving as Trustees since 2005:

YEAR	CORPORATE TRUSTEE	INDIVIDUAL TRUSTEES
2005	\$206,758	\$64,316
2006	\$209,596	\$64,316
2007	\$206,108	\$64,316
2008	\$182,692	\$64,316
2009	\$198,352	\$94,048
2010*	\$229,478	\$76,209
2011	\$230,617	\$76,209
2012	\$90,510	\$38,105
2013	0	0
2014	\$225,100	\$114,314
2015	0	0
Total	\$1,779,211	\$656,149

* Thomas H. Owen, Jr. became an individual trustee in September 2010. Prior to that time, Daniel Conwill served as an individual trustee.

INTERROGATORY NO. 2: Please describe meetings of the Trustees, whether in person, by phone or video conference (including Skype, Facetime and similar applications), during the Relevant Period. Your answer should include the type, and if appropriate, location of the meeting, who attended and the topics of discussion.

RESPONSE:

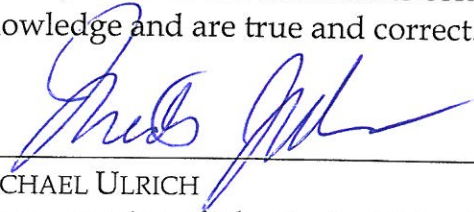
Plaintiffs object that this Interrogatory is overly broad and burdensome. Plaintiffs further object to this Interrogatory because it seeks information that is immaterial and irrelevant to the issues of this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence. TEX. R. CIV. P. 192.3(a); *see also Monsanto Co. v. May*, 889 S.W.2d 274, 276 (Tex. 1994). The scope of discovery is confined by the subject matter of the case and reasonable expectations of obtaining information that will aid resolution of the dispute. TEX. R. CIV. P. 191, cmt.1.

Subject to and without waiving the foregoing, please see Trustees' Meeting Agendas and Minutes that are being produced in response to Ad Litem's Request for Production.

VERIFICATION

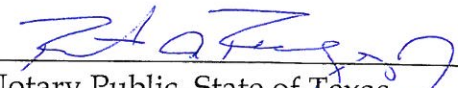
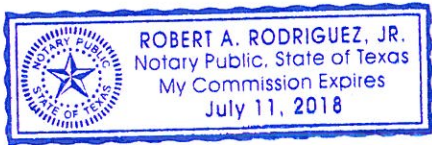
STATE OF TEXAS §
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COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, on this day personally appeared MICHAEL ULRICH, a representative of The Bank of New York Mellon Trust Company, N.A., who, being by me duly sworn, testified that he has read the foregoing Answers and Objections to Plaintiffs' First Set of Interrogatories, and that the statements contained in Interrogatory No. 1 are within his personal knowledge and are true and correct.



MICHAEL ULRICH
Representative of The Bank of New York
Mellon Trust Company, N.A.

SWORN AND SUBSCRIBED TO before me on this 14 day of April, 2016.



Notary Public, State of Texas