

CAUSE NO. C-1-PB-14-001245

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

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

TO: Attorney Ad Litem, Glenn M. Karisch, through his attorney of record, Dan Bitting, Scott Douglass McConnico, 303 Colorado Street, Suite 2400, Austin, Texas 78701.

Pursuant to the Texas Rules of Civil Procedure, 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 of the TEL Offshore Trust, ("Plaintiffs") hereby serve their First Amended Answers and Objections to Attorney Ad Litem's First Set of Interrogatories.

Respectfully submitted,

ANDREWS KURTH LLP

By: /s/ Georgia L. Lucier

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ATTORNEYS FOR TRUSTEES

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiffs' First Amended Answers and Objections to Attorney Ad Litem's First Set of Interrogatories have been served on Attorney Ad Litem Glenn M. Karisch on July 12, 2016, and upon the other interested parties in this matter in accordance with the Court's Order Directing Method of Service of Discovery dated June 9, 2016.

/s/ Georgia L. Lucier

**PLAINTIFFS' AMENDED 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:

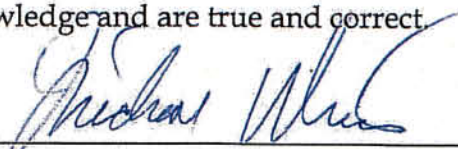
YEAR	CORPORATE TRUSTEE	INDIVIDUAL TRUSTEES
2005	\$206,758	\$64,316
2006	\$209,596	\$64,316
2007	\$206,108	\$64,316
2008	\$182,692	\$64,316
2009	\$207,500	\$94,048
2010*	\$207,500	\$63,507
2011	\$207,500	\$76,209
2012	\$90,510	\$38,105
2013	0	0
2014	\$225,850	\$114,314
2015	0	0
Total	\$1,744,014	\$643,447

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

VERIFICATION

STATE OF TEXAS §
 §
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 12 day of July, 2016.



Notary Public, State of Texas

