

Cause No. 2010-CI-10977

JOHN K. MEYER, ET AL.,	§	IN THE DISTRICT COURT
	§	
PLAINTIFFS,	§	
	§	
VS.	§	
	§	225TH JUDICIAL DISTRICT
	§	
JPMORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST AND	§	
GARY P. AYMES,	§	
	§	
DEFENDANTS.	§	BEXAR COUNTY, TEXAS

**NOTICE OF FILING OF AFFIDAVIT OF GARY P. AYMES**

JPMorgan Chase Bank, N.A., as Trustee of the South Texas Syndicate Trust, files the Affidavit of Gary P. Aymes, attached hereto as Exhibit 1, in response to Plaintiffs' Motion To Compel the Production of Documents Related To *JP MORGAN CHASE BANK, N.A., IN ITS CAPACITY AS TRUSTEE OF THE SOUTH TEXAS SYNDICATE TRUST V. PIONEER NATURAL RESOURCES USA, INC. AND EOG RESOURCES, INC.*

Respectfully submitted,

HORNBERGER SHEEHAN FULLER &  
BEITER, INC.

Patrick K. Sheehan  
[psheehan@hsfblaw.com](mailto:psheehan@hsfblaw.com)  
State Bar No. 18175500  
Kevin M. Beiter  
[kbeiter@hsfblaw.com](mailto:kbeiter@hsfblaw.com)  
State Bar No. 02059065  
Rudy A. Garza  
[rugar@hsfblaw.com](mailto:rugar@hsfblaw.com)  
State Bar No. 07738200  
David Jed Williams  
[jwilliams@hsfblaw.com](mailto:jwilliams@hsfblaw.com)  
State Bar No. 21518060

The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
Telephone: (210) 271-1700  
Facsimile: (210) 271-1730

HUNTON & WILLIAMS LLP

By: /s/ John C. Eichman  
Charles A. Gall  
[cgal@hunton.com](mailto:cgal@hunton.com)  
State Bar No. 07281500  
John C. Eichman  
[jeichman@hunton.com](mailto:jeichman@hunton.com)  
State Bar No. 06494800  
Amy S. Bowen  
[abowen@hunton.com](mailto:abowen@hunton.com)  
State Bar No. 24028216

1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
Telephone: (214) 979-3000  
Facsimile: (214) 880-0011

**ATTORNEYS FOR DEFENDANT  
JPMORGAN CHASE BANK, N.A., AS  
TRUSTEE OF THE SOUTH TEXAS  
SYNDICATE TRUST**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served on the following counsel of record via the electronic service manager and/or by email on this 22nd day of January, 2014.

John B. Massopust  
Matthew J. Gollinger  
Zelle Hofmann Voelbel & Mason LLP  
500 Washington Avenue South, Suite 5000  
Minneapolis, MN 55415  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)  
[mgollinger@zelle.com](mailto:mgollinger@zelle.com)

Michael S. Christian  
Zelle Hoffmann Voelbel & Mason LLP  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

James L. Drought  
DROUGHT DROUGHT & BOBBITT, LLP  
112 E. Pecan Street, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)

Richard Tinsman  
Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78205  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

Steven J. Badger  
Ashley Bennett Jones  
Zelle Hofmann Voelbel & Mason LLP  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zell.com](mailto:sbadger@zell.com)

George Spencer, Jr.  
Jeffrey J. Jowers  
CLEMENS & SPENCER, P.C.  
112 E. Pecan St., Suite 1300  
San Antonio, Texas 78205  
[spencer@clemens-spencer.com](mailto:spencer@clemens-spencer.com)  
[jjowers@clemens-spencer.com](mailto:jjowers@clemens-spencer.com)

David R. Deary  
Jim L. Flegle  
Jeven R. Sloan  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)  
[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)  
[jevans@LFDlaw.com](mailto:jevans@LFDlaw.com)

Fred W. Stumpf  
GLAST, PHILLIPS & MURRAY  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

/s/ John C. Eichman

\_\_\_\_\_  
John C. Eichman



current position, I served as a Vice President and was a Trust Advisor in JPMorgan's Private Bank. I was one of the individuals responsible for administering the South Texas Syndicate Trust (the "Trust") while a case styled *JP Morgan Chase Bank, N.A., In Its Capacity as Trustee of the South Texas Syndicate Trust v. Pioneer Natural Resources USA, Inc. and EOG Resources, Inc.* (the "Pioneer Litigation") was pending. I am also a Defendant in this lawsuit.

3. As a result of my job duties and responsibilities, I have personal knowledge regarding some materials withheld from production under the attorney-client and work-product privileges in the Pioneer Litigation.

4. The law firm of Cox Smith Matthews, Inc. ("Cox Smith") represented JPMorgan in the Pioneer Litigation along with other attorneys and support staff with Cox Smith worked on the case. In addition, several JPMorgan in-house attorneys provided legal advice to JPMorgan in connection with the Pioneer Litigation.

5. Attached as Exhibit 1 is an excerpt of Defendants' Third Supplemental Privilege Log, which was produced in the present litigation (the "Privilege Log Excerpt"). The Privilege Log Excerpt reflects:

(a) Confidential communications between Cox Smith attorneys and JPMorgan employees made for the purpose of facilitating the rendition of legal services in the Pioneer Litigation in the time period leading up to and during the Pioneer Litigation ("Communications with Outside Counsel");

(b) confidential communications between JPMorgan's in-house legal counsel and employees of JPMorgan made for the purpose of facilitating the rendition of legal services in the Pioneer Litigation in the time period leading up to and during the Pioneer Litigation ("Communications with In-House Counsel"); and

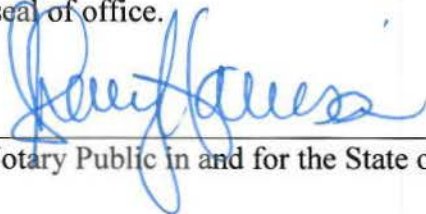
(c) confidential communications made in anticipation of the Pioneer Litigation or for trial of the Pioneer Litigation between or among JPMorgan's representatives, including JPMorgan's attorneys, consultants, employees, or agents ("Litigation Materials").

6. JPMorgan intends for the Outside Counsel Communications, In-House Counsel Communications and Litigation Materials to remain confidential and not to be disclosed.

  
\_\_\_\_\_  
Gary P. Aymes

Sworn and subscribed to before me by the said Gary P. Aymes on the 22 day of January, 2014, to certify which witness my hand and seal of office.



  
\_\_\_\_\_  
Notary Public in and for the State of Texas

My commission expires:

7-8-2017

# EXHIBIT A

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 002930	04/14/2009 10:14	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002931	04/14/2009 10:14	Patricia A Ormond	Charlotte K Ray; Colleen Dean; Gary P. Aymes	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002932	04/14/2009 10:15	Patricia A Ormond <patricia.a.ormond@jpmorgan.com> Charlotte K Ray	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 002933	04/15/2009 16:55	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Charlotte K Ray; Colleen Dean; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Re: Fw: Claim against Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002934	04/15/2009 16:55	Charlotte K Ray	Patricia A Ormond; Colleen Dean; Gary P. Aymes	Re: Fw: Claim against Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002935	04/21/2009 10:51	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	South Texas Syndicate vs. Pioneer Resources et al; Failure to develop claim; request for summary judgment; proposed engagement letter	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 002936	04/22/2009 15:55	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Re: South Texas Syndicate vs. Pioneer Resources et al; Failure to develop claim; request for summary judgment; proposed engagement letter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002937	08/11/2009 20:03	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS Testifying Expert	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002938	08/18/2009 11:33	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002939	08/18/2009 11:35	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002940	08/18/2009 11:35	Gary P. Aymes	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002941	08/18/2009 11:50	Patricia A Ormond	Gary P. Aymes	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002942	08/18/2009 11:55	Gary P. Aymes Gary P. Aymes	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation Trust Administration	Attorney Client/ Work Product
JPM-PRIV 002943	08/18/2009 11:55	Patricia A Ormond <Patricia.A.Ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002944	08/18/2009 12:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation Trust administration	Attorney Client/ Work Product
JPM-PRIV 002945	08/18/2009 12:02	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002950	09/21/2009 18:59	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Moore, James T <james.t.moore@jpmchase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	FW: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002951	09/22/2009 7:00	Moore, James T <james.t.moore@jpmchase.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product



**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 002953	11/10/2009 13:44	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia Ormond <salandman@yahoo.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	Cox & Smith invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002956	11/30/2009 15:45	Charlotte K Ray <wehmeyer@coxsmith.com>	Charlotte K Ray; Gary P. Aymes; Bertram Hayes-Davis <Charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002957	11/30/2009 15:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <Charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002958	11/30/2009 15:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <Charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002959	11/30/2009 16:00	Charlotte K Ray	Gary P. Aymes; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002960	11/30/2009 17:34	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>	FW: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002961	11/30/2009 18:17	Gary P. Aymes	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis; Charlotte K Ray Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Charlotte K Ray <Charlotte.k.ray@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002962	11/30/2009 18:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Charlotte K Ray <Charlotte.k.ray@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002963	11/30/2009 18:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Charlotte K Ray <Charlotte.k.ray@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002964	12/01/2009 15:38	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002965	12/01/2009 15:38	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002966	12/03/2009 13:01	Gary P. Aymes	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002967	12/03/2009 13:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002968	12/03/2009 13:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002969	12/03/2009 13:04	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes	Re: Pioneer/STS: Invoice	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 002970	12/03/2009 13:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002971	12/03/2009 13:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002972	12/03/2009 14:34	Charlotte K Ray <Charlotte.k.ray@jpmorgan.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 002973	12/03/2009 14:34	Charlotte K Ray	Gary P. AymesWehmeyer, Corey <wehmeyer@coxsmith.com>; Bertram Hayes-Davis Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002974	12/03/2009 14:34	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002975	12/03/2009 14:47	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002976	12/03/2009 14:47	Charlotte K Ray	Gary P. AymesWehmeyer, Corey <wehmeyer@coxsmith.com>; Bertram Hayes-Davis Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002977	12/03/2009 14:47	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002978	12/03/2009 15:08	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002979	12/03/2009 15:08	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002980	12/03/2009 15:27	Charlotte K Ray	Gary P. AymesWehmeyer, Corey <wehmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002981	12/10/2009 16:43	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	FW: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002982	12/10/2009 16:50	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002983	12/10/2009 16:50	Charlotte K Ray	Bertram Hayes-DavisColleen DeanGary P. AymesH L Tompkins; Susan Kravik	RE: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002984	12/10/2009 19:33	Colleen Dean <Colleen.Dean@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002985	12/14/2009 12:34	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002986	12/14/2009 15:06	Gary P. Aymes	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002987	12/14/2009 16:10	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: filed petitions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002988	12/14/2009 16:10	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: filed petitions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002989	12/15/2009 11:38	Gary P. Aymes	Charlotte K RaySusan Kravik	FW: STS v. Pioneer: filed petitions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002990	12/15/2009 11:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: STS v. Pioneer: filed petitions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002991	12/15/2009 11:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: STS v. Pioneer: filed petitions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 002992	12/18/2009 18:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002993	12/18/2009 18:10	<cwehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002994	12/18/2009 18:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002995	12/22/2009 14:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - discovery extension and Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002996	12/22/2009 14:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - discovery extension and Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002997	12/29/2009 17:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	JPMorgan/Pioneer: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002998	12/29/2009 17:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 002999	12/29/2009 18:00	Charlotte K Ray	Bertram Hayes-DavisGary P. AymesWehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003000	12/30/2009 10:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003001	12/30/2009 10:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003002	12/30/2009 10:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003003	12/30/2009 10:58	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003004	12/30/2009 11:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003005	12/30/2009 11:12	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003006	12/30/2009 11:12	Bertram Hayes-Davis	Charlotte K RayGary P. AymesWehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003007	12/30/2009 11:52	Gary P. Aymes	Bertram Hayes-DavisCharlotte K RayWehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Re: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003008	12/30/2009 11:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Re: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003009	12/30/2009 14:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Revised Interrogatory No. 3	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003010	12/31/2009 11:21	Gary P. Aymes	Bertram Hayes-DavisWehmeyer, Corey <cwehmeyer@coxsmith.com>; Charlotte K RayTruss, Marty <jmtruss@coxsmith.com>	RE: Revised Interrogatory No. 3	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003018	01/04/2010 10:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Verifications	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003019	01/04/2010 10:59	<cwehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Verifications	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003020	01/04/2010 10:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Verifications	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003021	01/04/2010 11:02	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA to Plaintiff.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003022	01/04/2010 11:02	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA to Plaintiff.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003023	01/04/2010 12:46	Gary P. Aymes	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Verifications	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003024	01/04/2010 12:46	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Verifications	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003026	01/05/2010 12:15	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: JPMorgan v. Pioneer: Discovery Responses (Pioneer's second set of Rogs, RFP, RFA)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003027	01/05/2010 12:15	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: JPMorgan v. Pioneer: Discovery Responses (Pioneer's second set of Rogs, RFP, RFA)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003047	01/11/2010 10:02	Bertram Hayes-Davis	Colleen DeanGary P. AymesJohn C Minter; Anderson, Sheri (Sheri.Anderson@jpmorgan.com)H L Tompkins	Pattie Status	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 003048	01/11/2010 10:03	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003049	01/11/2010 10:03	Gary P. Aymes	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003050	01/11/2010 10:03	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003061	01/12/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. AymesH L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS attorneys' fees	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003062	01/12/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS attorneys' fees	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003063	01/12/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS attorneys' fees	Email with attachment	Pioneer/EOG litigation	Attorney Client

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003064	01/12/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS attorneys' fees	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003077	01/20/2010 9:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Objections to Corporate Representative and Custodian of Records Topics and Document Requests	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003078	01/20/2010 9:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Charlotte K Ray Gary P. Aymes H L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Objections to Corporate Representative and Custodian of Records Topics and Document Requests	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003079	01/20/2010 9:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Objections to Corporate Representative and Custodian of Records Topics and Document Requests	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003080	01/20/2010 9:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Objections to Corporate Representative and Custodian of Records Topics and Document Requests	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003082	01/25/2010 12:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	JPMorgan/STS: Pre-Deposition Information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003083	01/25/2010 12:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	JPMorgan/STS: Pre-Deposition Information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003084	01/25/2010 15:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003085	01/25/2010 15:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes; Bertram Hayes-Davis Truss, Marty <jmtruss@coxsmith.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003086	01/25/2010 15:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003087	01/25/2010 15:50	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003088	01/25/2010 15:50	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003089	01/25/2010 16:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	RE: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003090	01/25/2010 16:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	RE: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003091	01/25/2010 16:54	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003092	01/25/2010 16:54	Bertram Hayes-Davis	Gary P. Aymes	RE: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003093	01/25/2010 17:01	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003094	01/25/2010 17:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003095	01/25/2010 17:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003096	01/26/2010 8:59	Gary P. Aymes <gary.p.aymes@corpexchange.com> Wehmeyer, Corey	Colleen Dean <Colleen.Dean@jpmorgan.com>John C.Minter <john.c.minter@jpmorgan.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003100	01/28/2010 11:37	<cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003101	01/28/2010 11:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003102	01/28/2010 11:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003103	01/28/2010 13:12	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003104	01/28/2010 13:12	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	STS litigation	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003105	01/28/2010 13:42	Charlotte K Ray	Gary P. Aymes	RE: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003106	01/28/2010 17:36	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003107	01/28/2010 17:36	Gary P. Aymes	Charlotte K Ray	RE: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003114	02/02/2010 9:06	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Tompkins, H <h.tompkins@jpmchase.com>	FW: South Texas Syndicate	Email only	Beneficiary communications Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003118	02/03/2010 12:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003119	02/03/2010 12:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-DavisGary P. AymesH L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003120	02/03/2010 12:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003121	02/03/2010 12:23	Tompkins, H <h.tompkins@jpmchase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003122	02/03/2010 12:23	H L Tompkins	Bertram Hayes-DavisGary P. AymesWehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003123	02/03/2010 12:23	Tompkins, H L <h.l.tompkins@jpmchase.com> <h.l.tompkins@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003124	02/03/2010 12:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	FW: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003125	02/03/2010 12:38	Gary P. Aymes	Colleen Dean; John C Minter	FW: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003126	02/03/2010 12:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	FW: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003129	02/03/2010 14:13	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003130	02/03/2010 14:13	Bertram Hayes-Davis	Gary P. Aymes; H L Tompkins; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Sheri Anderson; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003131	02/03/2010 14:13	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003132	02/03/2010 14:44	Gary P. Aymes	Bertram Hayes-Davis	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003133	02/03/2010 14:44	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003134	02/03/2010 14:44	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003149	02/16/2010 10:16	H L Tompkins	Bert Hayes-Davis; Gary P. Aymes	FW: EQD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003150	02/16/2010 10:57	Gary P. Aymes	Sonia X Garza, Sherry Harrison	FW: EQD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003151	02/16/2010 10:57	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sonia X Garza <sonia.x.garza@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: EQD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003153	02/19/2010 8:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003154	02/19/2010 8:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis; Charlotte K Ray; Gary P. Aymes; H L Tompkins; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003155	02/19/2010 8:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003156	02/19/2010 11:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003157	02/19/2010 11:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Gary P. Aymes H L Tompkins; Sheri Anderson Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003158	02/19/2010 11:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003159	02/22/2010 10:05	Gary P. Aymes	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EQD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003160	02/22/2010 10:05	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EQD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003161	02/22/2010 10:05	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EQD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003162	02/22/2010 22:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003163	02/22/2010 22:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003166	02/25/2010 12:14	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com>	STS Cullen Lease production	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003167	02/25/2010 12:14	Gary P. Aymes	Bertram Hayes-Davis	STS Cullen Lease production	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 003168	02/25/2010 15:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	JPMorgan/Pioneer: Aymes Errata Sheet.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003169	02/25/2010 15:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	JPMorgan/Pioneer: Aymes Errata Sheet.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003170	02/25/2010 15:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Aymes Errata Sheet.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003171	02/25/2010 15:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Aymes Errata Sheet.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003172	03/04/2010 8:46	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray Gary P. Aymes	FW: STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003173	03/04/2010 9:55	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003174	03/04/2010 9:55	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003175	03/04/2010 9:55	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003181	03/10/2010 17:13	Gary P. Aymes Charlotte K Ray	Lester, Bill <whlester@coxsmith.com>; Gerhardt, Trey <wmgerhar@coxsmith.com> Herb J Sliger	RE: Fee Estimate for Due Diligence For Tax	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003197	03/30/2010 16:04	<charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Settlement Discussions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003198	04/02/2010 8:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; h.i.tompkins@jpmorgan.com <h.i.tompkins@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: Invoice and Planning	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003208	04/20/2010 17:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	<hfeldt@stx.rr.com>; Becky Miller <bmiller@scottdoug.com>; Jaime Rangel <jaime.rangel@rangellaw.com>; Jorge C. Rangel <jorge.c.rangel@rangellaw.com>; Mark Hanna <mhananna@scottdoug.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003209	04/20/2010 17:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	<hfeldt@stx.rr.com>; Becky Miller <bmiller@scottdoug.com>; Jaime Rangel <jaime.rangel@rangellaw.com>; Jorge C. Rangel <jorge.c.rangel@rangellaw.com>; Mark Hanna <mhananna@scottdoug.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 003210	04/21/2010 10:23	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003211	04/21/2010 10:23	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003212	04/21/2010 11:07	Gary P. Aymes	Colleen Dean/John C Minter	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003213	04/21/2010 11:07	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003214	04/21/2010 11:07	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003215	04/21/2010 16:14	Gary P. Aymes	Charlotte K Ray	FW: Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003216	04/21/2010 16:14	Gary P. Aymes	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003217	04/21/2010 16:14	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Lester, Bill <whlester@coxsmith.com>; Charlotte K Ray/Sherry Harrison/Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003220	04/22/2010 19:38	Gary P. Aymes	RE: STS	FW: Pioneer/STS - Second Discovery from EOG	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003234	05/05/2010 17:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003235	05/05/2010 17:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003249	05/10/2010 14:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003250	05/10/2010 14:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003261	05/10/2010 17:58	Gary P. Aymes	Colleen Dean Debra M Round John C Minter	FW: JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003262	05/10/2010 17:58	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	FW: JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003264	05/11/2010 10:55	Gary P. Aymes	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003265	05/11/2010 10:55	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003266	05/11/2010 12:02	Gary P. Aymes	Sherry Harrison	STS distribution memos	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003267	05/11/2010 12:02	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	STS distribution memos	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 003268	05/11/2010 15:59	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Debra M Round <debra.m.round@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	STS	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003269	05/11/2010 15:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Debra M Round <debra.m.round@corpexchange.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003270	05/11/2010 15:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Debra M Round <debra.m.round@corpexchange.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003271	05/12/2010 12:03	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	STS litigation	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003272	05/12/2010 12:03	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003273	05/12/2010 12:05	Charlotte K Ray	Gary P. Aymes	RE: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003274	05/12/2010 12:09	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003275	05/12/2010 12:09	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003276	05/12/2010 12:50	Gary P. Aymes	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003277	05/12/2010 12:50	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003278	05/12/2010 12:50	Gary P. Aymes	Charlotte K Ray	RE: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003279	05/12/2010 12:50	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003280	05/12/2010 13:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003281	05/12/2010 13:41	<cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003282	05/12/2010 14:38	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003283	05/12/2010 14:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003284	05/12/2010 14:38	Gary P. Aymes <gary.p.aymes@corpexchange.com> Charlotte K Ray	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Cindy K Eubank <cindy.k.eubank@jpmorgan.com>	FW: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003285	05/13/2010 7:26	<charlotte.k.ray@jpmorgan.com>	RE: STS litigation	Pioneer/EOG litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003286	05/13/2010 7:26	Charlotte K Ray	Gary P. Aymes; Cindy K Eubank	RE: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003287	05/13/2010 7:26	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Cindy K Eubank <cindy.k.eubank@jpmorgan.com>	RE: STS litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003300	05/18/2010 17:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Glen McFarlane <Glen.McFarlane@jpmchase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; berttram.hayes- davis@jpmorgan.com <berttram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003301	05/18/2010 17:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Glen McFarlane <Glen.McFarlane@jpmchase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; berttram.hayes- davis@jpmorgan.com <berttram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003302	05/19/2010 12:58	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003306	05/19/2010 15:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003314	05/20/2010 12:12	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com> Jaime Rangel <jaime.rangel@rangellaw.com>; <hfeldt@stx.rr.com>; Doug Dashiell <ddashiell@scottdoug.com>; Jorge C. Rangel <jorge.c.rangel@rangellaw.com>; Mark Hanna <mihanna@scottdoug.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003316	05/20/2010 17:44	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; berttram.hayes- davis@jpmorgan.com <berttram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan Chase Bank, N.A. v. Pioneer	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 003319	05/20/2010 21:17	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; berttram.hayes- davis@jpmorgan.com <berttram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to EOG Rogs and RFP (second set ),DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003320	05/20/2010 21:17	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; berttram.hayes- davis@jpmorgan.com <berttram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to EOG Rogs and RFP (second set ),DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003333	05/25/2010 17:40	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003334	05/25/2010 17:52	Tompkins, H <h.i.tompkins@jpmchase.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003340	05/25/2010 9:49	Beck, Jason R <jason.r.beck@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003346	06/01/2010 17:06	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Directions and Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003347	06/01/2010 17:06	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Directions and Invoice	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 003353	06/02/2010 12:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003354	06/02/2010 12:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003355	06/02/2010 12:26	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - dismissal question	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003356	06/02/2010 12:26	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - dismissal question	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003357	06/02/2010 12:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Debra M Round <debra.m.round@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com> Herb J Sliger <herb.j.sliger@jpmchase.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: Pioneer/STS - dismissal question	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003358	06/02/2010 12:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Debra M Round <debra.m.round@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com> Herb J Sliger <herb.j.sliger@jpmchase.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: Pioneer/STS - dismissal question	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003364	06/04/2010 11:31	Herb J Sliger <herb.j.sliger@jpmchase.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: Pioneer/STS - dismissal question	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003365	06/04/2010 17:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003366	06/04/2010 17:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003377	06/09/2010 14:26	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com>; Beck, Jason R <jason.r.beck@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Richard G Hugo <richard.g.hugo@jpmorgan.com>	DRAFT RESPONSE- let me know your thoughts	Email only	Pioneer/EOG litigation Tax opinion	Attorney Client
JPM-PRIV 003387	06/15/2010 17:01	Debra M Round <debra.m.round@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Herb J Sliger <herb.j.sliger@jpmchase.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Richard G Hugo <richard.g.hugo@jpmorgan.com>	STS Review call Thursday	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003402	06/30/2010 10:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003403	06/30/2010 10:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003404	06/30/2010 10:43	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003405	06/30/2010 10:43	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003406	06/30/2010 12:47	Herford, David <david.herford@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Herford contact info	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003415	07/09/2010 14:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003416	07/09/2010 14:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003417	07/09/2010 15:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer - Courtesy Copy of Pioneer Motion to Compel	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003418	07/09/2010 15:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer - Courtesy Copy of Pioneer Motion to Compel	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003419	07/09/2010 17:24	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	2001 annual Report	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003420	07/09/2010 17:36	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003421	07/09/2010 17:36	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003422	07/10/2010 10:21	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003423	07/10/2010 10:21	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003424	07/10/2010 10:22	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003425	07/10/2010 10:22	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003427	07/12/2010 14:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Bertra	Email with attachment	Pioneer/EOG litigation	Attorney Client

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003428	07/12/2010 14:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Truss, Marty <truss@jpmorgan.com> Bertram, Hayes-Davis <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS: Affidavit of Gary Aymes.DOC; Pioneer/STS: Affidavit of Sherry Anderson.DOC; Pioneer/STS: Affidavit of Sara Bender.DOC; Pioneer/STS: Affidavit of H.L. Tompkins.DOC; Pioneer/STS: Affidavit of Charlotte Ray.DOC; Pioneer/STS: Affidavit of Bertra	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003429	07/12/2010 15:55	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> Bertram, Hayes-Davis <bertram.hayes-davis@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS: Affidavit of Gary Aymes.DOC; Pioneer/STS: Affidavit of Sherry Anderson.DOC; Pioneer/STS: Affidavit of Sara Bender.DOC; Pioneer/STS: Affidavit of H.L. Tompkins.DOC; Pioneer/STS: Affidavit of Charlotte Ray.DOC; Pioneer/STS: Affidavit of Be	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003430	07/12/2010 15:55	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> Bertram, Hayes-Davis <bertram.hayes-davis@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS: Affidavit of Gary Aymes.DOC; Pioneer/STS: Affidavit of Sherry Anderson.DOC; Pioneer/STS: Affidavit of Sara Bender.DOC; Pioneer/STS: Affidavit of H.L. Tompkins.DOC; Pioneer/STS: Affidavit of Charlotte Ray.DOC; Pioneer/STS: Affidavit of Be	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003431	07/12/2010 16:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Tompkins, H <h.i.tompkins@jpmchase.com>	FW: converted for client	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003432	07/12/2010 17:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Bertram, Hayes-Davis <bertram.hayes-davis@jpmorgan.com>	FW: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003433	07/12/2010 17:38	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Sara A Bender <sara.a.bender@jpmchase.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	JPMorgan/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003434	07/12/2010 17:45	Tompkins, H <h.i.tompkins@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Bertram, Hayes-Davis <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003435	07/12/2010 17:45	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003438	07/13/2010 10:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: converted for client	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003439	07/13/2010 11:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Affidavit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003443	07/14/2010 21:55	Joe Finger <jmfinger49@aol.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Annual Report and Invoice	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 003446	07/16/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	STS/Pioneer: Response to Motion to Compel	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003447	07/18/2010 18:35	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Herb J Sliger <herb.j.sliger@jpmchase.com> Richard G Hugo <richard.g.hugo@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com>	Re: STS legal fees	Email only	Pioneer/EOG litigation Tax opinion	Attorney Client

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003451	07/20/2010 17:04	West, David <dbwest@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Herb J Sliger <herb.j.sliger@jpmchase.com> Richard G Hugo <richard.g.hugo@jpmorgan.com> Lester, Bill <wlester@coxsmith.com> McDonough, Bill <wjmcdono@coxsmith.com> Smith, Jamie <jsmith@coxsmith.com>	Revised_JPMorgan Chase Bank Invoices--May time	Email with attachment	Pioneer/EOG litigation Tax opinion	Attorney Client
JPM-PRIV 003454	07/21/2010 15:22	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	FW: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003455	07/21/2010 17:31	Herb J Sliger <herb.j.sliger@jpmchase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: Revised_JPMorgan Chase Bank Invoices--May time	Email with attachment	Pioneer/EOG litigation Tax opinion	Attorney Client
JPM-PRIV 003470	08/02/2010 12:22	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Invoices	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003492	08/25/2010 18:26	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Attorney Client Privileged Communication - STS	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003493	08/25/2010 18:26	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Attorney Client Privileged Communication - STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003494	09/01/2010 9:22	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: Round Table Group Invoice 12260	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003495	09/01/2010 9:22	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: Round Table Group Invoice 12260	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003496	09/01/2010 15:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003497	09/01/2010 15:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003498	09/01/2010 19:21	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: Round Table Group Invoice 12260	Email with attachment	Pioneer/EOG litigation Tax opinion	Attorney Client/ Work Product
JPM-PRIV 003502	09/10/2010 11:14	Herb J Sliger <herb.j.sliger@jpmchase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: STS Invoices for June and July	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003527	09/30/2010 13:46	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Round Table Group Invoice 12440	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003528	09/30/2010 13:46	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Round Table Group Invoice 12440	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003531	09/30/2010 18:24	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Round Table Group Invoice 12440	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003532	09/30/2010 18:24	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Round Table Group Invoice 12440	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003539	10/04/2010 16:22	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: STS/Pioneer: Talking Points for STS Beneficiaries Meeting.DOC	Email with attachment	Pioneer/EOG litigation / beneficiary communications / trust administration	Attorney Client/ Work Product
JPM-PRIV 003557	10/21/2010 17:40	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: STS/Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003559	10/25/2010 16:16	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Invoices for Expert Witness work	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003560	10/25/2010 16:16	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Invoices for Expert Witness work	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003566	11/02/2010 9:54	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003574	11/12/2010 14:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: JPMorgan Chase Bank v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003575	11/12/2010 14:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: JPMorgan Chase Bank v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003576	11/15/2010 11:22	Jenkins, Mirta <mjenkins@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003577	11/15/2010 11:22	Jenkins, Mirta <mjenkins@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003585	11/17/2010 11:53	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003586	11/17/2010 11:53	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG settlement / litigation	Attorney Client/ Work Product
JPM-PRIV 003587	11/17/2010 14:54	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003588	11/17/2010 14:57	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003589	11/17/2010 15:02	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Roth, David <dthroth@coxsmith.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003590	11/17/2010 17:43	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003591	11/17/2010 17:45	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003592	11/17/2010 17:51	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Herb J Sliger <herb.j.sliger@jpmchase.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003593	11/19/2010 9:05	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003594	11/19/2010 9:05	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003595	11/19/2010 10:35	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003601	11/30/2010 11:46	Gary P. Aymes	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: November Invoice for Expert Witness work	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003602	11/30/2010 11:46	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: November Invoice for Expert Witness work	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003603	11/30/2010 11:46	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: November Invoice for Expert Witness work	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003607	12/01/2010 15:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003608	12/01/2010 15:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003610	12/02/2010 11:43	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003611	12/02/2010 11:43	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003615	12/07/2010 9:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JP MORGAN CHASE BANK vs. PIONEER/GOLDSTEIN, LOUIS - Vol. I - E-Transcript File Delivery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003616	12/07/2010 9:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JP MORGAN CHASE BANK vs. PIONEER/GOLDSTEIN, LOUIS - Vol. I - E-Transcript File Delivery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003618	12/13/2010 10:16	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Oct invoice3	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003631	12/15/2010 17:59	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003632	12/15/2010 17:59	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003633	12/15/2010 18:10	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003634	12/15/2010 18:10	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003636	12/16/2010 12:32	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Lester, Bill <whlester@coxsmith.com>	RE: South Texas Syndicate Address	Email only	Pioneer/EOG litigation	Attorney Client

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003637	12/16/2010 14:35	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003638	12/16/2010 14:35	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003640	12/21/2010 16:30	Roth, David <dthrott@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003641	12/21/2010 16:30	Roth, David <dthrott@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003642	12/21/2010 16:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>	FW: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003643	12/21/2010 16:38	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>	FW: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003644	12/21/2010 16:43	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Debra M Round <debra.m.round@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003645	12/21/2010 16:43	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Debra M Round <debra.m.round@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003647	12/23/2010 13:53	Roth, David <dthrott@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Development Litigation against EOG and Pioneer - Mediation Date - Wednesday 19 January - Dallas	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003648	12/23/2010 13:53	Roth, David <dthrott@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Development Litigation against EOG and Pioneer - Mediation Date - Wednesday 19 January - Dallas	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003649	01/01/2011 19:49	N. S. Neidell <nneidell@sbcglobal.net>	<bertram.hayes-davis@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003661	01/05/2011 10:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003662	01/05/2011 10:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003663	01/05/2011 10:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003664	01/05/2011 10:52	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003665	01/05/2011 10:52	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003666	01/05/2011 10:52	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003668	01/05/2011 11:20	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003669	01/05/2011 11:20	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003670	01/05/2011 11:20	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003676	01/07/2011 10:02	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Call-in information for January 11, 2011 @ 11:00 a.m. conference call	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003677	01/07/2011 10:02	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Call-in information for January 11, 2011 @ 11:00 a.m. conference call	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003678	01/07/2011 17:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003679	01/07/2011 17:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003680	01/07/2011 17:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003681	01/07/2011 17:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Call-in information for January 11, 2011 @ 11:00 a.m. conference call	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003682	01/07/2011 19:44	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003683	01/07/2011 19:44	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003684	01/07/2011 19:44	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003685	01/10/2011 9:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003686	01/10/2011 9:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003687	01/10/2011 9:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003688	01/10/2011 10:09	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003689	01/10/2011 10:09	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003690	01/10/2011 10:09	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS - Mediation fee	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003693	01/10/2011 18:38	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003694	01/10/2011 18:38	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003695	01/10/2011 18:38	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003696	01/11/2011 9:05	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003697	01/11/2011 9:05	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003698	01/11/2011 9:05	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003699	01/11/2011 9:27	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003700	01/11/2011 9:27	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003701	01/11/2011 9:27	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Invoice (JP Morgan v. Pioneer Natural Resources)	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003704	01/12/2011 10:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Confidential Mediation Memorandum.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003705	01/12/2011 10:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Confidential Mediation Memorandum.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003706	01/12/2011 10:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Confidential Mediation Memorandum.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003707	01/12/2011 10:51	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - mediation logistics and contact information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003708	01/12/2011 10:51	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - mediation logistics and contact information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003709	01/12/2011 10:51	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - mediation logistics and contact information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003710	01/12/2011 11:42	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: Pioneer/STS - mediation logistics and contact information	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003711	01/12/2011 11:42	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: Pioneer/STS - mediation logistics and contact information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003713	01/12/2011 12:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003714	01/12/2011 12:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG litigation / settlement	Attorney Client/ Work Product
JPM-PRIV 003715	01/12/2011 12:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003719	01/12/2011 14:42	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003720	01/12/2011 14:42	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003721	01/12/2011 14:42	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003723	01/12/2011 16:44	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003724	01/12/2011 16:44	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003725	01/12/2011 16:44	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003730	01/13/2011 16:39	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003731	01/13/2011 16:39	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003732	01/13/2011 16:44	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003733	01/13/2011 16:44	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003734	01/13/2011 16:44	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003737	01/13/2011 17:52	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: December Invoice - .JP Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 003738	01/13/2011 17:52	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: December Invoice - .JP Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003739	01/13/2011 17:52	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: December Invoice - ,JP Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003740	01/13/2011 17:58	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: December Invoice - ,JP Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 003741	01/13/2011 17:58	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: December Invoice - ,JP Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003743	01/20/2011 9:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003744	01/20/2011 9:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003745	01/20/2011 9:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003746	01/20/2011 11:58	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003747	01/20/2011 14:19	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003748	01/21/2011 15:47	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003749	01/21/2011 15:51	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>, Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003752	01/21/2011 17:44	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003754	01/24/2011 10:56	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003755	01/24/2011 10:56	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003756	01/24/2011 10:56	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003757	01/24/2011 11:08	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003758	01/24/2011 11:08	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003759	01/24/2011 11:08	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003760	01/24/2011 12:34	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003761	01/24/2011 12:34	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003762	01/24/2011 12:34	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003763	01/24/2011 20:20	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003764	01/24/2011 20:20	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003765	01/24/2011 20:20	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003766	01/24/2011 20:27	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003767	01/24/2011 20:27	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003768	01/24/2011 20:27	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003769	01/24/2011 21:29	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	final settlement FW: South Texas Syndicate Trust v. Pioneer and EOG	Email only	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003771	01/31/2011 16:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: JPM v Pioneer/EOG Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003772	01/31/2011 16:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: JPM v Pioneer/EOG Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003773	01/31/2011 16:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: JPM v Pioneer/EOG Settlement Documents	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003774	02/02/2011 11:41	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Invoice for Expert Witness Work on Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003775	02/02/2011 11:41	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Invoice for Expert Witness Work on Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003776	02/02/2011 11:41	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Invoice for Expert Witness Work on Morgan Chase Bank, Trustee South Texas Syndicate Trust vs. Pioneer Natural Resources USA Inc. et al. Dist. Court, La Salle County TX., 218th Judicial District Court Case No. 09-04000036	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003777	02/02/2011 12:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003778	02/02/2011 12:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003779	02/02/2011 12:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003780	02/02/2011 15:40	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003781	02/02/2011 15:40	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003782	02/02/2011 15:40	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003783	02/09/2011 9:25	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Final Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003785	02/10/2011 14:43	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: STS case	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003786	02/10/2011 14:43	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: STS case	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003787	02/10/2011 14:43	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: STS case	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003789	02/10/2011 19:31	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS case	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003791	02/11/2011 12:38	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	Fw: STS docs on CD's	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003792	02/11/2011 13:06	Tompkins, H <h.i.tompkins@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS case	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003793	02/11/2011 13:06	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS case	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003795	02/14/2011 17:27	Roth, David <dhroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003796	02/14/2011 17:27	Roth, David <dhroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003797	02/14/2011 17:27	Roth, David <dhroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003801	02/14/2011 19:57	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003802	02/14/2011 19:57	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003803	02/14/2011 19:57	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003804	02/15/2011 9:27	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003805	02/15/2011 9:27	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003806	02/15/2011 9:27	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003807	02/15/2011 9:37	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com>	Pioneer agreement	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003808	02/15/2011 9:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003809	02/15/2011 9:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003810	02/15/2011 9:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003811	02/15/2011 10:48	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003812	02/15/2011 10:48	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003813	02/15/2011 10:48	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003827	02/21/2011 9:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003828	02/21/2011 9:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003829	02/21/2011 9:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003832	02/24/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003833	02/24/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003834	02/24/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003835	02/24/2011 12:52	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003836	02/24/2011 12:52	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003837	02/24/2011 12:52	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003838	02/24/2011 13:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003839	02/24/2011 13:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003840	02/24/2011 13:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003843	02/28/2011 8:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003844	02/28/2011 8:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003845	02/28/2011 8:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003846	02/28/2011 9:19	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003847	02/28/2011 9:19	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product



**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003848	02/28/2011 9:19	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 003849	02/28/2011 9:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003850	02/28/2011 9:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003851	02/28/2011 9:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 003852	02/28/2011 15:57	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003853	02/28/2011 15:57	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003854	02/28/2011 15:57	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003855	03/08/2011 11:25	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003856	03/08/2011 11:25	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003857	03/08/2011 11:25	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003858	03/08/2011 11:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: Pioneer/STS - Tracked Changes versions of documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003859	03/08/2011 11:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: Pioneer/STS - Tracked Changes versions of documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003860	03/08/2011 11:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: Pioneer/STS - Tracked Changes versions of documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003861	03/08/2011 12:47	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003862	03/08/2011 17:51	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003863	03/08/2011 17:54	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <droth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Re: FINAL Settlement Documents - For JPMorgan Execution	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003864	03/08/2011 18:03	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003865	03/08/2011 18:03	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003866	03/08/2011 18:03	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003867	03/09/2011 15:47	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Altair Resources Invoice	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 003868	03/09/2011 16:47	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003869	03/10/2011 12:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS settlement - Executed Copy from Pioneer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003870	03/10/2011 12:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS settlement - Executed Copy from Pioneer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003871	03/10/2011 12:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS settlement - Executed Copy from Pioneer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003872	03/11/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003873	03/11/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003874	03/11/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003875	03/11/2011 11:19	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003876	03/11/2011 11:19	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003877	03/11/2011 11:19	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003878	03/11/2011 11:24	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003879	03/11/2011 11:24	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003880	03/11/2011 11:24	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003881	03/11/2011 12:30	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	STS v Pioneer: Complete, Executed Version of Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003882	03/11/2011 12:30	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	STS v Pioneer: Complete, Executed Version of Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003883	03/11/2011 12:30	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	STS v Pioneer: Complete, Executed Version of Settlement	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003884	03/11/2011 15:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	Re: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003885	03/11/2011 15:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <susan.kravik@corpexchange.com>	Re: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003886	03/11/2011 15:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <susan.kravik@corpexchange.com>	Re: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003887	03/13/2011 20:30	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Herb J Sliger <herb.j.sliger@jpmchase.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com>	March STS Memo	Email with attachment	Pioneer/EOG settlement Trust administration Trust Valuation	Attorney Client/ Work Product
JPM-PRIV 003888	03/14/2011 10:10	Susan Kravik <SUSAN.KRAVIK@chase.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Herb J Sliger <herb.j.sliger@jpmchase.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: March STS Memo	Email with attachment	Pioneer/EOG settlement Trust administration Trust Valuation	Attorney Client/ Work Product
JPM-PRIV 003889	03/14/2011 12:30	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: Notice to STS beneficiaries	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 003890	03/14/2011 12:30	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: Notice to STS beneficiaries	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003891	03/14/2011 12:30	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: Notice to STS beneficiaries	Email with attachment	Pioneer/EOG settlement / beneficiary communications	Attorney Client/ Work Product
JPM-PRIV 003893	03/14/2011 14:14	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer - Motion to Enter Final Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003894	03/14/2011 14:14	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer - Motion to Enter Final Judgment	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003896	03/14/2011 15:44	Tompkins, H <h.i.tompkins@jpmchase.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation Trust Valuation Trust administration	Attorney Client/ Work Product
JPM-PRIV 003897	03/14/2011 16:14	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS March Memo	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003898	03/14/2011 16:38	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Settlement Statement	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 003899	03/15/2011 14:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003900	03/15/2011 14:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003901	03/15/2011 14:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003902	03/16/2011 10:37	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer case	Email only	Beneficiary communications Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 003903	03/16/2011 12:15	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: Pioneer case	Email with attachment	Beneficiary communications Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 003904	03/16/2011 12:15	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: Pioneer case	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003905	03/16/2011 12:15	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: Pioneer case	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003906	03/17/2011 10:57	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003907	03/17/2011 10:57	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003908	03/17/2011 10:57	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003909	03/17/2011 11:33	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	STS fee on Settlement?	Email only	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 003910	03/17/2011 11:37	Susan Kravik <SUSAN.KRAVIK@chase.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: STS fee on Settlement?	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003911	03/21/2011 12:00	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003912	03/21/2011 12:00	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003913	03/21/2011 12:00	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003914	03/21/2011 12:25	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003915	03/21/2011 12:25	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003916	03/21/2011 12:25	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003917	03/24/2011 14:27	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product Confidential/Settlement Agreements

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003918	03/24/2011 14:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003919	03/24/2011 14:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003920	03/24/2011 14:39	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS settlement	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003921	03/24/2011 14:39	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003922	03/24/2011 14:39	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003923	03/24/2011 15:40	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Re: STS settlement	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003925	03/24/2011 15:40	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Re: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003926	03/24/2011 15:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthoth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003927	03/24/2011 15:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthoth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003928	03/24/2011 15:47	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: STS settlement	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003929	03/24/2011 15:47	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003930	03/24/2011 15:47	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003931	03/24/2011 15:51	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003932	03/24/2011 15:51	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003933	03/24/2011 15:51	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product



EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003934	03/24/2011 17:26	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: STS settlement	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003935	03/24/2011 17:26	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003936	03/24/2011 17:26	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: STS settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003937	03/28/2011 10:03	Roth, David <dthroth@coxsmith.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 003938	03/28/2011 10:03	Roth, David <dthroth@coxsmith.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003939	03/28/2011 10:03	Roth, David <dthroth@coxsmith.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003946	03/29/2011 10:09	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003947	03/29/2011 10:09	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003948	03/29/2011 10:09	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003949	03/29/2011 13:13	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Wire transfer	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003950	03/29/2011 13:13	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Wire transfer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003951	03/29/2011 17:48	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Wire transfer	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003952	03/29/2011 17:48	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Wire transfer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003953	03/29/2011 17:51	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Wire transfer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003954	03/29/2011 17:51	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 003957	04/06/2011 9:50	Roth, David <dthroth@coxsmith.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003958	04/06/2011 9:50	Roth, David <dthroth@coxsmith.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003959	04/06/2011 9:50	Roth, David <dthroth@coxsmith.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Wehmeyer, Corey <wehmeyer@coxsmith.com>	Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 003960	04/06/2011 17:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003961	04/06/2011 17:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003962	04/06/2011 17:01	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 003966	04/12/2011 12:26	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Insert to memorandum to respond to Masucci email	Email with attachment	Beneficiary communications / Pioneer/EOG litigation	Attorney Client
JPM-PRIV 003967	04/12/2011 12:50	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Insert to memorandum to respond to Masucci email	Email with attachment	Beneficiary communications / Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 003968	04/12/2011 14:53	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Attorney Client Privileged	Email with attachment	Pioneer/EOG litigation / trust administration	Attorney Client
JPM-PRIV 003971	04/14/2011 14:23	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Insert to memorandum to respond to Masucci email	Email with attachment	Beneficiary communications / Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004064	06/04/2011 14:00	Michael Schaub <mschaub@carneiro.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Zachary Wiebe <zwiebe@carneiro.com>	RE: STS - Audit Question	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004065	06/04/2011 14:00	Michael Schaub <mschaub@carneiro.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Zachary Wiebe <zwiebe@carneiro.com>	RE: STS - Audit Question	Email with attachment	Trust Audit Pioneer/EOG settlement	Work Product
JPM-PRIV 004080	06/07/2011 10:10	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: Footnote to 2010 annual report	Email only	Trust Audit Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004082	06/07/2011 11:06	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: Footnote to 2010 annual report	Email only	Trust Audit Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004088	06/07/2011 18:07	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Michael Schaub <mschaub@carneiro.com>; Zachary Wiebe <zwiebe@carneiro.com>	RE: Management Representation Letter	Email with attachment	Trust Audit Pioneer/EOG settlement	Work Product
JPM-PRIV 004095	06/08/2011 15:46	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Michael Schaub <mschaub@carneiro.com>	RE: Audit	Email with attachment	Trust Audit Pioneer/EOG settlement	Work Product
JPM-PRIV 004142	08/04/2011 8:44	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	STS/Pioneer litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004143	08/05/2011 18:13	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	STS docs	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004285	12/14/2011 17:26	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: STS Memo draft	Email only	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004286	12/14/2011 17:35	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: STS Memo draft	Email only	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004287	12/14/2011 17:38	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004288	12/14/2011 17:40	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004289	12/14/2011 17:41	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: STS Memo draft	Email only	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004290	12/14/2011 17:42	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004291	12/14/2011 17:48	Tompkins, H <h.i.tompkins@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004292	12/14/2011 17:49	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004293	12/14/2011 18:05	Tompkins, H <h.i.tompkins@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004294	12/14/2011 18:07	Tompkins, H <h.i.tompkins@jpmchase.com>	Susan Kravik <SUSAN.KRAVIK@chase.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004295	12/14/2011 18:20	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004296	12/14/2011 18:21	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004297	12/14/2011 18:33	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS Memo draft	Email with attachment	Trust administration / Pioneer/EOG Settlement	Attorney Client/ Work Product
JPM-PRIV 004366	07/18/2012 13:13	Susan Kravik <SUSAN.KRAVIK@chase.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Cookie E Brown <cookie.e.brown@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com>	FW: INVOICE	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004367	07/18/2012 15:09	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: INVOICE	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004399	07/10/2009 16:47	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	John C Minter <john.c.minter@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com>	Proposal for Third Party Management (STS)	Email with attachment	Pioneer/EOG litigation	Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004401	05/13/2010 16:24	Colleen Dean <Colleen.Dean@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>John C Minter <John.C.minter@jpmorgan.com>Kevin R Smith <Kevin.R.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Follow-up From Last Week's Meeting	Email with attachment	Tax opinion Trust Valuation Trust administration Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004408	10/07/2010 18:16	Claire A Shaw <claire.a.shaw@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Claire A Shaw <claire.a.shaw@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>John C Minter <John.C.minter@jpmorgan.com>Kevin R Smith <Kevin.R.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>Linda S Zinck <linda.s.zinck@jpmorgan.com>Patrick J Pacheco <patrick.j.pacheco@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	STS Meeting Follow-Up	Email only	Pioneer/EOG settlement Tax opinion Trust Valuation Trust structures/alternatives	Attorney Client
JPM-PRIV 004409	10/07/2010 18:19	Kevin R Smith <kevin.r.smith@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Claire A Shaw <claire.a.shaw@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>John C Minter <John.C.minter@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>Linda S Zinck <linda.s.zinck@jpmorgan.com>Patrick J Pacheco <patrick.j.pacheco@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS Meeting Follow-Up	Email only	Pioneer/EOG settlement Tax opinion Trust Valuation Trust structures/alternatives	Attorney Client
JPM-PRIV 004410	10/07/2010 18:35	Herb J Sliger <herb.j.sliger@jpmchase.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Claire A Shaw <claire.a.shaw@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>John C Minter <John.C.minter@jpmorgan.com>Kevin R Smith <Kevin.R.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Linda S Zinck <linda.s.zinck@jpmorgan.com>Patrick J Pacheco <patrick.j.pacheco@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS Meeting Follow-Up	Email only	Pioneer/EOG settlement Tax opinion Trust Valuation Trust structures/alternatives	Attorney Client

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004411	10/07/2010 19:20	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Claire A Shaw <claire.a.shaw@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Tompkins, H <h.j.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>Linda S Zinck <linda.s.zinck@jpmorgan.com>Patrick J Pacheco <patrick.j.pacheco@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	Re: STS Meeting Follow-Up	Email only	Pioneer/EOG litigation Tax opinion Trust valuation Trust structures/alternatives	Attorney Client
JPM-PRIV 004415	10/21/2010 9:23	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.j.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	STS - follow-up	Email only	Pioneer/EOG litigation Tax issues Tax opinion Trust audit Trust structures/alternatives	Attorney Client
JPM-PRIV 004422	05/30/2008 20:15	Patricia A Ormond	Jeremy X Derington	South Texas Syndicate	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004423	04/23/2009 17:41	Patricia A Ormond	Jeremy X Derington	2009.04.23 - STS - Pioneer Natural Resources_ Plaintiff_s Original Petition_2543618_1-DOC.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004424	05/26/2009 17:51	Jeremy x derington <jeremy.x.derington@jpmchase.com>	Jeremy x derington <jeremy.x.derington@jpmchase.com>	Cox & Smith Invoices	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004425	05/26/2009 17:53	Jeremy x derington <jeremy.x.derington@jpmchase.com>	Jeremy x derington <jeremy.x.derington@jpmchase.com>	Cox & Smith Invoices	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004426	05/26/2009 17:54	Jeremy x derington <jeremy.x.derington@jpmchase.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	FW: Cox & Smith Invoices	Email with attachment	Pioneer/EOG litigation Lease amendments	Attorney Client/ Work Product
JPM-PRIV 004427	05/26/2009 17:54	Jeremy X Derington	Patricia A Ormond	FW: Cox & Smith Invoices	Email with attachment	Pioneer/EOG litigation Lease amendments	Attorney Client/ Work Product
JPM-PRIV 004428	06/16/2009 21:03	Patricia A Ormond	Jeremy X Derington	Letter to Pioneer re properties.doc	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004429	06/18/2009 15:45	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Jeremy X Derington	South Texas Syndicate_ First Response to Disclosures_2570526_1 (2) WITH NAMES-DOC.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004430	06/18/2009 15:45	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Jeremy X Derington	South Texas Syndicate_ First Response to Disclosures_2570526_1 (2) WITH NAMES-DOC.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004431	06/18/2009 15:45	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; jeremy x derington <jeremy.x.derington@jpmchase.com>	South Texas Syndicate_ First Response to Disclosures_2570526_1 (2) WITH NAMES-DOC.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004432	04/21/2009 10:50	Patricia A Ormond	Bertram Hayes-DavisCharlotte K RayColleen DeanGary P. Aymes	South Texas Syndicate vs. Pioneer Resources et al; Failure to develop claim; request for summary judgment; proposed engagement letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004433	05/22/2009 14:46	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer's Answer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004434	06/05/2009 14:54	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>	FW: Proposal	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004435	07/10/2009 16:47	Patricia A Ormond	Bertram Hayes-Davis John C Minter; Colleen DeanKevin R Smith	Proposal for Third Party Management (STS) Our 07/23/2009 meeting and other matters including STS Litigation	Email with attachment	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 004436	07/24/2009 18:56	Patricia A Ormond	Bertram Hayes-Davis	FW: STS v Pioneer/EOG STS Proposal	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004437	07/24/2009 19:03	Patricia A Ormond	Bertram Hayes-Davis	FW: STS v Pioneer/EOG STS Proposal	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004438	07/27/2009 21:05	Patricia A Ormond	Bertram Hayes-Davis	FW: STS v Pioneer/EOG STS Proposal	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004439	09/03/2009 18:21	Patricia A Ormond	Bertram Hayes-Davis	FW: Master Land Services - Concept Energy & JPM	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004440	09/14/2009 16:13	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Agreement	Email with attachment	Trust administration / pioneer/EOG litigation	Work Product
JPM-PRIV 004441	09/21/2009 18:54	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Stephen H McCauley <stephen.h.mccauley@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004442	09/22/2009 9:21	Bertram Hayes-Davis	Patricia A Ormond	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004443	09/22/2009 9:21	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004444	09/22/2009 15:10	Patricia A Ormond	Stephen H McCauley; Bertram Hayes-Davis	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004445	09/22/2009 15:12	Patricia A Ormond	Bertram Hayes-Davis	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004446	09/23/2009 12:00	Patricia A Ormond	Bertram Hayes-Davis; Moore, James T	email preservation - STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004447	09/23/2009 12:03	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary J Sorrentino <gary.j.sorrentino@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: email preservation - STS litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004448	09/25/2009 12:48	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>		RE: E-Mails	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004449	10/09/2009 13:54	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Kelly Crissinger <kelly.crissinger@jpmorgan.com>	Pattie Ormond contract	Email with attachment	Trust administration / Pioneer/EOG litigation	Work Product
JPM-PRIV 004450	10/13/2009 14:55	Charlotte K Ray	Bertram Hayes-Davis	FW: Data request inquiry	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004451	10/16/2009 8:41	Bertram Hayes-Davis	Patricia Ormond <salandman@yahoo.com>	RE: Cox Smith call this am	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004452	10/16/2009 10:54	Charlotte K Ray	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Privileged and Confidential: RE: Incident id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004453	10/16/2009 11:15	Bertram Hayes-Davis	Charlotte K Ray Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Privileged and Confidential: RE: Incident id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004454	10/16/2009 11:15	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Privileged and Confidential: RE: Incident id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004455	10/16/2009 12:35	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Privileged and Confidential: RE: Incident id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004459	10/27/2009 16:41	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com>	STS meeting Nov 9	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004460	11/03/2009 8:09	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS meeting Nov 9	Email with attachment	Trust administration / Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004461	11/03/2009 8:09	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS meeting Nov 9	Email with attachment	Pioneer/EOG litigation / trust administration	Attorney Client/ Work Product
JPM-PRIV 004462	11/04/2009 12:00	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004463	11/04/2009 12:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis	RE: STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004464	11/04/2009 12:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004465	11/04/2009 12:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis	FW: Pioneer/STS lawsuit, La Salle County	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004466	11/04/2009 12:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Pioneer/STS lawsuit, La Salle County	Email with attachment	Pioneer/EOG litigation / trust administration	Attorney Client/ Work Product
JPM-PRIV 004467	11/04/2009 15:59	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004468	11/27/2009 10:43	Bertram Hayes-Davis	Colleen Dean Gary P. Aymes	FW: STS letter	Email with attachment	Pioneer/EOG litigation / trust administration	Attorney Client/ Work Product
JPM-PRIV 004469	11/30/2009 8:52	Bertram Hayes-Davis	Colleen Dean; Anderson, Sheri (Sheri.Anderson@jpmorgan.com) H L Tompkins	RE: STS letter	Email only	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 004470	11/30/2009 8:52	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com>	RE: STS letter	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004471	11/30/2009 15:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray Gary P. Aymes; Bertram Hayes-Davis	Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004472	11/30/2009 15:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004473	11/30/2009 15:55	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - correspondence with Pattie Ormond since October 1, 2009	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004474	11/30/2009 15:55	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - correspondence with Pattie Ormond since October 1, 2009	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004475	11/30/2009 16:00	Charlotte K Ray	Gary P. Aymes Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004476	11/30/2009 17:26	Bertram Hayes-Davis	Charlotte K Ray Gary P. Aymes Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004477	11/30/2009 17:26	Bertram Hayes-Davis	Charlotte K Ray Gary P. Aymes Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004478	11/30/2009 17:26	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004479	11/30/2009 18:17	Gary P. Aymes	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis Charlotte K Ray Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004480	11/30/2009 18:17	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Bertram Hayes-Davis; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004481	12/01/2009 15:26	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004482	12/01/2009 15:26	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004483	12/01/2009 15:38	Bertram Hayes-Davis	Gary P. Aymes	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004484	12/01/2009 15:38	Bertram Hayes-Davis	Gary P. Aymes	FW: Pioneer/STS: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004485	12/03/2009 14:34	Charlotte K Ray	Gary P. Aymes Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004486	12/03/2009 14:34	Charlotte K Ray	Gary P. Aymes Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004487	12/03/2009 14:36	Tompkins, H <h.l.tompkins@jpmchase.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS letter	Email with attachment	Pioneer/EOG litigation	Work Product



EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004488	12/03/2009 14:36	H L Tompkins	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004489	12/03/2009 14:47	Charlotte K Ray	Gary P. Aymes>Wehnmeyer, Corey <wehnmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004490	12/03/2009 15:08	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Charlotte K RayGary P. Aymes; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004491	12/03/2009 15:27	Charlotte K Ray	Gary P. Aymes>Wehnmeyer, Corey <wehnmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004492	12/03/2009 15:27	Charlotte K Ray	Gary P. Aymes>Wehnmeyer, Corey <wehnmeyer@coxsmith.com>; Bertram Hayes-Davis	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004493	12/03/2009 15:27	Charlotte K Ray	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>;Wehnmeyer, Corey <wehnmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004494	12/03/2009 18:31	Patricia Ormond <salandman@yahoo.com>	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>;Roth, David <dthroth@coxsmith.com>;Tompkins, H <h.l.tompkins@jpmchase.com>;bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	January	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004495	12/04/2009 8:31	Bertram Hayes-Davis	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS - deposition notices	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004496	12/04/2009 10:14	H L Tompkins	Bertram Hayes-Davis	FW: STS	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004497	12/07/2009 10:19	Bertram Hayes-Davis	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004498	12/07/2009 10:19	Bertram Hayes-Davis	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004499	12/08/2009 7:36	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - deposition notices	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004500	12/08/2009 8:25	Bertram Hayes-Davis	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS - deposition notices	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004501	12/10/2009 17:07	Susan Kravik	Bertram Hayes-DavisCharlotte K Ray	Re: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004502	12/10/2009 19:55	H L Tompkins	Bertram Hayes-Davis	RE: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004503	12/11/2009 7:37	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004504	12/18/2009 14:52	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004505	12/18/2009 18:10	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004506	12/22/2009 14:05	<wehnmeyer@coxsmith.com>	Charlotte K Ray; Bertram Hayes-DavisGary P. AymesTruss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - discovery extension and Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004507	12/24/2009 13:49	Kevin R Smith <kevin.r.smith@jpmorgan.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004508	12/24/2009 14:17	Bertram Hayes-Davis	Kevin R Smith	RE: Pattie	Email only	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 004509	12/28/2009 14:36	Bertram Hayes-Davis	Kevin R Smith	Pattie	Email only	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 004510	12/28/2009 15:44	Bertram Hayes-Davis	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>; Charlotte K Ray	RE: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004511	12/28/2009 15:44	Bertram Hayes-Davis	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Charlotte K Ray	RE: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004512	12/28/2009 15:44	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004513	12/28/2009 15:53	Bertram Hayes-Davis	H L Tompkins	FW: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004514	12/28/2009 15:53	Bertram Hayes-Davis	H L Tompkins	FW: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004515	12/28/2009 15:53	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	FW: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004516	12/29/2009 9:13	Bertram Hayes-Davis	Kevin R Smith	RE: Pattie	Email only	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 004517	12/29/2009 12:08	<kevin.r.smith@jpmorgan.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004518	12/29/2009 17:49	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004519	12/29/2009 18:00	Charlotte K Ray	Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004520	12/30/2009 10:38	Charlotte K Ray	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Bertram Hayes-Davis	FW: hire and termination dates	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004521	12/30/2009 10:47	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004522	12/30/2009 10:58	Charlotte K Ray	Bertram Hayes-DavisGary P. AymesWehmeyer, Corey <wehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004523	12/30/2009 11:11	Bertram Hayes-Davis	Greg Crow <greg@travispm.com>	FW: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004524	12/30/2009 11:11	Bertram Hayes-Davis	Greg Crow <greg@travispm.com>	FW: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004525	12/30/2009 11:31	Greg Crow <greg@travispm.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: hire and termination dates	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004526	12/30/2009 15:07	Bertram Hayes-Davis	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Revised Interrogatory No. 3	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004527	12/31/2009 11:21	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Truss, Marty <jmtruss@coxsmith.com>	RE: Revised Interrogatory No. 3	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004528	01/04/2010 10:59	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. Aymes; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Verifications	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004529	01/04/2010 11:02	Wehmeyer, Corey <wehmeyer@coxsmith.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA to Plaintiff.DOC	JPMorgan/Pioneer: Our Responses to Pioneer's Second Set of Rogs, RFP and 1st RFA to Plaintiff.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004531	01/04/2010 13:29	Bertram Hayes-Davis	Bertram Hayes-Davis	pioneer verification	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004532	01/04/2010 13:32	Bertram Hayes-Davis	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: pioneer verification	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004533	01/04/2010 13:32	Bertram Hayes-Davis	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: pioneer verification	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004535	01/06/2010 13:41	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Kelly Crissinger <kelly.crissinger@jpmorgan.com> Penny P Domow <Penny.P.Domow@jpmorgan.com>	RE: Ormond consulting agreements	Email with attachment	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 004540	01/07/2010 16:08	H L Tompkins	Bertram Hayes-Davis	Re:	Email only	Trust administration / Pioneer/EOG litigation	Work Product
JPM-PRIV 004541	01/11/2010 10:24	Bertram Hayes-Davis Wehmeyer, Corey	Colleen Dean	RE: Pattie Status	Email only	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 004542	01/11/2010 12:15	<cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Charlotte K Ray H L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004543	01/11/2010 12:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004544	01/11/2010 12:25	Charlotte K Ray	Bertram Hayes-Davis H L Tompkins Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004545	01/11/2010 12:25	Charlotte K Ray	Bertram Hayes-Davis H L Tompkins Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004546	01/11/2010 12:25	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004547	01/11/2010 13:02	H L Tompkins	Bertram Hayes-Davis Charlotte K Ray Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004548	01/11/2010 13:02	H L Tompkins	Bertram Hayes-Davis Charlotte K Ray Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004549	01/11/2010 13:02	Tompkins, H <h.l.tompkins@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004550	01/11/2010 13:03	Bertram Hayes-Davis	Charlotte K Ray H L Tompkins Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004551	01/11/2010 13:03	Bertram Hayes-Davis	Charlotte K Ray H L Tompkins Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004552	01/11/2010 13:03	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004554	01/11/2010 19:16	Colleen Dean <Colleen.Dean@jpmorgan.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pattie Status	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004555	01/11/2010 20:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Charlotte K Ray H L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004556	01/11/2010 20:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004557	01/12/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Charlotte K Ray Gary P. Aymes H L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS attorneys' fees	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004558	01/13/2010 16:43	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Pioneer Offer	Email only	Pioneer/EOG settlement	Work Product
JPM-PRIV 004559	01/13/2010 16:44	Tompkins, H <h.l.tompkins@jpmchase.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Offer	Email only	Pioneer/EOG settlement	Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004560	01/20/2010 9:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-DavisCharlotte K RayGary P. AymesH L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Objections to Corporate Representative and Custodian of Records Topics and Document Requests	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004561	01/25/2010 9:46	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>>h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>		Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004562	01/25/2010 12:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes; Bertram Hayes-DavisCharlotte K RayTruss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS: Pre-Deposition Information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004563	01/25/2010 12:55	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	H L Tompkins; Bertram Hayes-DavisTruss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Settlement proposal to Pioneer/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004564	01/25/2010 12:55	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	JPMorgan/Pioneer: Settlement proposal to Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004565	01/25/2010 14:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004566	01/25/2010 14:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004567	01/25/2010 15:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-DavisH L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004568	01/25/2010 15:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>>h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004569	01/25/2010 15:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes; Bertram Hayes-DavisTruss, Marty <jmtruss@coxsmith.com>	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004570	01/25/2010 15:50	Bertram Hayes-Davis	Gary P. Aymes; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004571	01/25/2010 15:50	Bertram Hayes-Davis	Gary P. Aymes; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004572	01/25/2010 16:49	Bertram Hayes-Davis	Allen L Niven	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004573	01/25/2010 16:49	Bertram Hayes-Davis	Allen L Niven	FW: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004574	01/25/2010 16:52	Gary P. Aymes	Bertram Hayes-Davis; Colleen DeanJohn C Minter	RE: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004575	01/25/2010 16:52	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>>John C Minter <john.c.minter@jpmorgan.com>	RE: JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004576	01/25/2010 21:03	H L Tompkins	Bertram Hayes-Davis	Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004577	01/25/2010 21:03	Tompkins, H <h.l.tompkins@jpmchase.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004578	01/26/2010 9:28	Bertram Hayes-Davis	Allen L Niven	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004579	01/26/2010 14:41	Allen L Niven	Bertram Hayes-Davis	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004580	01/26/2010 14:55	Bertram Hayes-Davis	Allen L Niven	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004581	01/26/2010 15:35	Allen L Niven	Bertram Hayes-Davis	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004582	01/26/2010 15:40	Bertram Hayes-Davis	Allen L Niven	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004583	01/26/2010 15:49	Bertram Hayes-Davis	H L Tompkins	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004584	01/26/2010 15:49	Bertram Hayes-Davis	H L Tompkins	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004585	01/26/2010 15:49	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
Bates No.	Date	From	To, Cc, Bcc	Subject	Document Type	Document Description	Privilege
JPM-PRIV 004586	01/26/2010 15:53	H L Tompkins Tompkins, H	Bertram Hayes-Davis	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004587	01/26/2010 15:53	<h.l.tompkins@jpmchase.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004588	01/26/2010 15:54	Bertram Hayes-Davis	Allen L Niven	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004589	01/26/2010 15:54	Bertram Hayes-Davis	Allen L Niven	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004590	01/26/2010 19:20	Allen L Niven	Bertram Hayes-Davis H L Tompkins	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004591	01/26/2010 19:20	Niven, Allen	Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004592	01/26/2010 20:04	<allen.l.niven@jpmchase.com>	<bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004593	01/26/2010 20:04	H L Tompkins	Bertram Hayes-Davis				
JPM-PRIV 004594	01/26/2010 20:04	Tompkins, H	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>				Attorney Client/ Work Product
JPM-PRIV 004594	01/26/2010 20:19	<h.l.tompkins@jpmchase.com>	Allen L Niven	FW:	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004595	01/26/2010 20:19	Bertram Hayes-Davis	Allen L Niven	FW:	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004596	01/28/2010 14:24	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; H L Tompkins	Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004597	01/28/2010 14:24	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; H L Tompkins	Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004598	01/28/2010 14:24	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Tompkins, H <h.l.tompkins@jpmchase.com>	Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004599	01/28/2010 14:58	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis H L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	RE: Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004600	01/28/2010 14:58	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004601	01/28/2010 15:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis H L Tompkins; Charlotte K RayTruss, Marty <jmtruss@coxsmith.com>	FW: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004602	01/28/2010 15:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004603	01/28/2010 15:24	Bertram Hayes-Davis	Allen L Niven	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004604	01/28/2010 15:24	Bertram Hayes-Davis	Allen L Niven	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004605	01/28/2010 16:50	H L Tompkins	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Bertram Hayes-Davis	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004606	01/28/2010 16:50	Tompkins, H <h.l.tompkins@jpmchase.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004607	01/28/2010 16:52	Bertram Hayes-Davis	H L Tompkins	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004608	01/28/2010 16:52	Bertram Hayes-Davis	H L Tompkins	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004609	01/28/2010 16:52	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>					
JPM-PRIV 004610	01/28/2010 17:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004611	01/28/2010 17:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	H L Tompkins; Bertram Hayes-DavisTruss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation / settlement	Attorney Client/ Work Product
JPM-PRIV 004611	01/28/2010 17:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004612	02/03/2010 12:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Gary P. Aymes H L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004613	02/03/2010 12:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004614	02/03/2010 12:23	H L Tompkins	Bertram Hayes-Davis Gary P. Aymes Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004615	02/03/2010 14:13	Bertram Hayes-Davis	Gary P. Aymes H L Tompkins Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Sheri Anderson Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004616	02/03/2010 14:44	Gary P. Aymes	Bertram Hayes-Davis	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004617	02/03/2010 14:44	Gary P. Aymes	Bertram Hayes-Davis	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004618	02/03/2010 14:44	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Bertram Hayes-Davis <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004619	02/16/2010 9:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com>	FW: EOD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004620	02/19/2010 8:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Charlotte K Ray Gary P. Aymes H L Tompkins; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004621	02/19/2010 8:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> h.l.tompkins@jpmorgan.com <h.l.tompkins@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004622	02/19/2010 11:10	Bertram Hayes-Davis	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Amendments to Protective order	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004623	02/19/2010 11:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Gary P. Aymes H L Tompkins; Sheri Anderson Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004624	02/22/2010 22:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis Gary P. Aymes H L Tompkins; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004625	02/25/2010 12:14	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS Cullen Lease production	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004626	02/25/2010 12:48	Bertram Hayes-Davis	Allen L Niven	FW: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004627	03/01/2010 11:55	Gary P. Aymes	Bertram Hayes-Davis	STS Legal	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004628	03/10/2010 18:23	Roth, David <dthroth@coxsmith.com>	H L Tompkins; Bertram Hayes-Davis Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Settlement Proposal - STS v. PKD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004629	03/19/2010 12:44	Tompkins, H <h.l.tompkins@jpmchase.com>	Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Settlement Proposal - STS v. PKD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004630	03/30/2010 12:14	Truss, Marty <jmtruss@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com>	Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004631	03/30/2010 12:17	Tompkins, H <h.l.tompkins@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Truss, Marty <jmtruss@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004632	03/30/2010 12:17	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Truss, Marty <jmtruss@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004633	03/30/2010 12:18	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>Truss, Marty <jmtruss@coxsmith.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004634	03/30/2010 12:18	Truss, Marty <jmtruss@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004635	03/30/2010 12:19	Charlotte K Ray	Bertram Hayes-Davis H L TompkinsTruss, Marty <jmtruss@coxsmith.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004636	03/30/2010 12:19	Charlotte K Ray	Tompkins, H <h.l.tompkins@jpmchase.com>Truss, Marty <jmtruss@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004637	03/30/2010 12:20	Charlotte K Ray	Tompkins, H <h.l.tompkins@jpmchase.com>Truss, Marty <jmtruss@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004638	03/30/2010 12:38	Truss, Marty <jmtruss@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004639	03/30/2010 12:46	Tompkins, H <h.l.tompkins@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Truss, Marty <jmtruss@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004640	03/30/2010 12:46	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Truss, Marty <jmtruss@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004641	04/02/2010 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-DavisGary P. AymesH L Tompkins Bertram Hayes-Davis H L TompkinsWehmeyer, Corey <cwehmeyer@coxsmith.com>; Sherry Harrison	STS - Invoice from Ormond	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004642	04/02/2010 10:58	Gary P. Aymes	Bertram Hayes-Davis H L TompkinsWehmeyer, Corey <cwehmeyer@coxsmith.com>; Sherry Harrison	RE: STS - Invoice from Ormond	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004643	04/09/2010 22:08	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Amended Acreage toward PXD Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004647	04/20/2010 17:52	Bertram Hayes-Davis	Matthew A Theisen	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 004648	04/20/2010 17:52	Bertram Hayes-Davis Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Matthew A Theisen	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 004649	04/21/2010 10:23	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. AymesH L Tompkins; Bertram Hayes-DavisTruss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004652	04/23/2010 17:06	H L Tompkins	Bertram Hayes-DavisKevin R Smith	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 004653	04/23/2010 17:06	Tompkins, H <h.l.tompkins@jpmchase.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 004654	04/23/2010 17:06	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004655	04/26/2010 9:18	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	STS Power Point	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004658	05/05/2010 17:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Bertram Hayes-Davis/Charlotte K Ray/Gary P. Aymes/H L Tompkins; Roth, David <dhroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004659	05/06/2010 14:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG litigation / settlement	Attorney Client/ Work Product
JPM-PRIV 004664	10/01/2010 17:40	C.G. Tyner <gtyner@sbcglobal.net>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	South Texas Syndicate Trust	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004665	10/01/2010 19:29	N. S. Neidell <nneidell@sbcglobal.net>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Meeting and Current Invoice	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 004666	10/12/2010 10:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Report on Washburn Ranch Field	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004667	10/18/2010 10:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: revised report, models included	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004669	10/21/2010 13:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004670	10/21/2010 13:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS/Pioneer	Email with attachment	Pioneer/EOG litigation Trust Valuation	Attorney Client/ Work Product
JPM-PRIV 004672	11/17/2010 11:53	Roth, David <dhroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation / settlement	Attorney Client/ Work Product
JPM-PRIV 004673	11/17/2010 15:02	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Roth, David <dhroth@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004674	11/17/2010 15:02	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Roth, David <dhroth@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004675	11/18/2010 18:03	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Beck, Jason R <jason.r.beck@jpmorgan.com>; Jenkins, Mirra <mjenkins@coxsmith.com>; Roth, David <dhroth@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	Re: calendar	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004676	11/19/2010 9:05	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004677	11/19/2010 9:05	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004678	11/19/2010 10:27	Jenkins, Mirta <mjenkins@coxsmith.com>	<jason.r.beck@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan Chase Bank vs. Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004679	11/19/2010 10:27	Jenkins, Mirta <mjenkins@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Beck, Jason R <jason.r.beck@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan Chase Bank vs. Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004681	12/01/2010 15:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004682	03/08/2011 18:03	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004683	03/09/2011 16:14	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004684	04/05/2011 17:22	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	Paragraph	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 004685	04/05/2011 17:22	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	Paragraph	Email with attachment	Pioneer/EOG settlement / trust administration	Attorney Client/ Work Product
JPM-PRIV 004686	04/12/2011 10:05	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	Re: STS - Pioneer/EOG	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004687	04/13/2011 12:46	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG settlement / litigation	Attorney Client/ Work Product
JPM-PRIV 004688	04/13/2011 12:46	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: Pioneer/STS Final Litigation invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004725	08/28/2007 11:12	Patricia A Ormond	david.herford@jpmorgan.com@JPMCHASE	Re: South Texas Syndicate - possible litigation	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 004810	08/29/2008 8:43	Patricia A Ormond Bosell, Benjamin	Roth, David <dthroth@coxsmith.com>	RE: STS - Carrizo Oil & Gas STS 104-5 Meeting: Patricia Schultz-Ormond, David Roth and Ben Bosell	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004886	03/31/2009 11:00	<bbosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	Pioneer/EOG litigation	Email only	Pioneer/EOG litigation	Attorney Client

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004887	04/07/2009 17:28	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>Roth, David <dthroth@coxsmith.com>; jeremy x dderington <jeremy.x.derington@jpmchase.com>	Pioneer Area Wells-xls.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004888	04/07/2009 17:28	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>Roth, David <dthroth@coxsmith.com>; jeremy x dderington <jeremy.x.derington@jpmchase.com>	Pioneer Area Wells-xls.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004889	04/07/2009 17:28	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>Roth, David <dthroth@coxsmith.com>; jeremy x dderington <jeremy.x.derington@jpmchase.com>	Pioneer Area Wells-xls.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004890	04/07/2009 17:28	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>Roth, David <dthroth@coxsmith.com>; jeremy x dderington <jeremy.x.derington@jpmchase.com>	Pioneer Area Wells-xls.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004891	04/07/2009 17:28	Patricia A Ormond	Bosell, Benjamin <bosell@coxsmith.com>Roth, David <dthroth@coxsmith.com>; jeremy x dderington <jeremy.x.derington@jpmchase.com>	Pioneer Area Wells-xls.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004892	04/07/2009 17:29	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>Roth, David <dthroth@coxsmith.com>; jeremy x dderington <jeremy.x.derington@jpmchase.com>	Pioneer Area Wells-xls.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004894	04/08/2009 12:37	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	BlueStone consent	Email with attachment	Lease negotiations	Attorney Client
JPM-PRIV 004895	04/08/2009 12:37	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	BlueStone consent	Email with attachment	Lease negotiations	Attorney Client
JPM-PRIV 004896	04/08/2009 14:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>	Re: BlueStone consent	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004931	04/13/2009 18:25	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004932	04/13/2009 18:26	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004933	04/13/2009 18:26	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004934	04/14/2009 10:14	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>;Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004935	04/14/2009 10:14	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>;Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004936	04/14/2009 10:14	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>;Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004937	04/14/2009 10:15	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>;Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004938	04/14/2009 10:15	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>;Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004939	04/14/2009 10:15	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>;Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Fw: Claim against Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004940	04/15/2009 16:55	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>;Colleen Dean <Colleen.Dean@jpmorgan.com>;Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Re: Fw: Claim against Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004941	04/20/2009 18:27	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Bosell, Benjamin <bbosell@coxsmith.com>	STS - Pioneer Natural Resources USA, Inc. - Engagement Letter and Original Petition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004942	04/20/2009 18:27	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Bosell, Benjamin <bbosell@coxsmith.com>	STS - Pioneer Natural Resources USA, Inc. - Engagement Letter and Original Petition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004943	04/20/2009 18:27	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Bosell, Benjamin <bbosell@coxsmith.com>	STS - Pioneer Natural Resources USA, Inc. - Engagement Letter and Original Petition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004944	04/21/2009 10:51	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	South Texas Syndicate vs. Pioneer Resources et al; Failure to develop claim; request for summary judgment; proposed engagement letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004945	04/21/2009 10:51	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	South Texas Syndicate vs. Pioneer Resources et al; Failure to develop claim; request for summary judgment; proposed engagement letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004946	04/22/2009 15:55	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: South Texas Syndicate vs. Pioneer Resources et al; Failure to develop claim; request for summary judgment; proposed engagement letter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004947	04/22/2009 15:55	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: South Texas Syndicate vs. Pioneer Resources et al; Failure to develop claim; request for summary judgment; proposed engagement letter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004948	04/23/2009 10:25	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004949	04/23/2009 10:25	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004950	04/23/2009 10:25	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004951	04/23/2009 10:25	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004952	04/23/2009 16:58	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer matter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004953	04/23/2009 16:58	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer matter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004954	04/23/2009 16:58	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer matter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004955	04/23/2009 17:17	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	RE: Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004956	04/23/2009 17:17	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	RE: Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004957	04/23/2009 17:17	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	RE: Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004958	04/23/2009 17:17	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	RE: Pioneer matter	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>						
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u> <u>Privilege</u>
JPM-PRIV 004959	04/23/2009 17:36	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer matter	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004960	04/23/2009 17:36	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer matter	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004961	04/23/2009 17:36	Roth, David <dthroth@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer matter	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004962	04/23/2009 17:41	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	jeremy x derington <jeremy.x.derington@jpmchase.com>	2009.04.23 - STS_ Pioneer Natural Resources_ Plaintiff_ s Original Petition_ 2543618_ 1-DOC.zip	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004963	04/23/2009 17:41	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	jeremy x derington <jeremy.x.derington@jpmchase.com>	2009.04.23 - STS_ Pioneer Natural Resources_ Plaintiff_ s Original Petition_ 2543618_ 1-DOC.zip	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 004964	04/23/2009 17:41	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	jeremy x derington <jeremy.x.derington@jpmchase.com>	2009.04.23 - STS_ Pioneer Natural Resources_ Plaintiff_ s Original Petition_ 2543618_ 1-DOC.zip	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 004965	04/23/2009 17:41	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	jeremy x derington <jeremy.x.derington@jpmchase.com>	2009.04.23 - STS_ Pioneer Natural Resources_ Plaintiff_ s Original Petition_ 2543618_ 1-DOC.zip	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004966	04/23/2009 17:42	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	jeremy x derington <jeremy.x.derington@jpmchase.com>	2009.04.23 - STS_ Pioneer Natural Resources_ Plaintiff_ s Original Petition_ 2543618_ 1-DOC.zip	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 004967	04/23/2009 17:59	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Schultz-Ormond, Patricia	pioneer matter	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004968	04/23/2009 17:59	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	pioneer matter	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004969	04/23/2009 17:59	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	pioneer matter	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 004970	04/23/2009 17:59	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	pioneer matter	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004971	04/23/2009 18:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Original Petition	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004972	04/23/2009 18:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Original Petition	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004973	04/23/2009 18:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Original Petition	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004974	04/23/2009 18:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Original Petition	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004975	04/23/2009 18:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	Original Petition	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 004976	04/23/2009 18:00	Patricia A Ormond	Roth, David <dthroth@coxsmith.com>	Original Petition	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 004986	04/28/2009 19:12	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: status	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004987	04/28/2009 19:23	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: status	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004988	04/28/2009 19:23	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: status	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004989	04/29/2009 11:36	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; CURT KNEESE <curtkim@verizon.net>; Roth, David <dthroth@coxsmith.com>	FW: La Salle County - title project	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004990	04/29/2009 11:39	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; CURT KNEESE <curtkim@verizon.net>; Roth, David <dthroth@coxsmith.com>	FW: La Salle County - title project	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004991	04/29/2009 11:56	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>; CURT KNEESE <curtkim@verizon.net>	Re: FW: La Salle County - title project	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 004992	04/29/2009 11:56	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Bosell, Benjamin <bosell@coxsmith.com>; CURT KNEESE <curtkim@verizon.net>	Re: FW: La Salle County - title project	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004993	04/29/2009 11:56	Patricia A Ormond	Bosell, Benjamin <bosell@coxsmith.com>; CURT KNEESE <curtkim@verizon.net>	Re: FW: La Salle County - title project	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004994	04/29/2009 12:00	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; CURT KNEESE <curtkim@verizon.net>	RE: FW: La Salle County - title project	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004996	04/29/2009 12:04	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; CURT KNEESE <curtkim@verizon.net>	RE: FW: La Salle County - title project	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004997	04/29/2009 15:43	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: filed petition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004998	04/29/2009 15:43	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: filed petition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 004999	04/29/2009 15:43	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer: filed petition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005000	04/30/2009 13:21	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Roth, David <dthroth@coxsmith.com>	RE: meeting next week (7th or 8th)	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005001	04/30/2009 13:21	Patricia A Ormond	Roth, David <dthroth@coxsmith.com>	RE: meeting next week (7th or 8th)	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005002	05/11/2009 17:34	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: STS v. Pioneer: status	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005003	05/11/2009 17:34	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: STS v. Pioneer: status	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005015	05/22/2009 12:27	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	STS - Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005016	05/22/2009 12:27	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	STS - Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005017	05/22/2009 12:27	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>	STS - Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005018	05/22/2009 12:27	Bosell, Benjamin <bosell@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>	STS - Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005020	05/22/2009 12:55	Patricia A Ormond	Bosell, Benjamin <bosell@coxsmith.com>; Roth, David <dthroth@coxsmith.com>	RE: STS - Pioneer	Email with attachment	Pioneer/EOG litigation Lease administration	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005021	05/22/2009 12:55	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Bosell, Benjamin <bosell@coxsmith.com>; Roth, David <dthroth@coxsmith.com>	RE: STS - Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005022	05/22/2009 12:55	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Bosell, Benjamin <bosell@coxsmith.com>; Roth, David <dthroth@coxsmith.com>	RE: STS - Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005023	05/22/2009 14:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS: Pioneer's Answer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005024	05/22/2009 14:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS: Pioneer's Answer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005025	05/22/2009 14:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS: Pioneer's Answer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005026	05/22/2009 14:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS: Pioneer's Answer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005027	05/22/2009 16:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer Natural Resources: Plaintiff's First Amended Petition.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005028	05/22/2009 16:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer Natural Resources: Plaintiff's First Amended Petition.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005029	05/22/2009 16:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer Natural Resources: Plaintiff's First Amended Petition.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005030	05/22/2009 16:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer Natural Resources: Plaintiff's First Amended Petition.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005031	05/22/2009 17:06	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS/Pioneer Natural Resources: Plaintiff's First Amended Petition.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005032	05/22/2009 17:06	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS/Pioneer Natural Resources: Plaintiff's First Amended Petition.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005033	05/22/2009 17:06	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS/Pioneer Natural Resources: Plaintiff's First Amended Petition.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005034	05/26/2009 17:41	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	cox & Smith litigation invoice & check request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005035	05/26/2009 17:41	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	cox & Smith litigation invoice & check request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005036	05/26/2009 18:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	cox & smith litigation expense & check request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005037	05/26/2009 18:00	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	cox & smith litigation expense & check request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005042	05/26/2009 18:36	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005043	05/26/2009 18:36	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005044	05/26/2009 18:36	Patricia A Ormond	Patricia A Ormond	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005045	05/26/2009 18:36	Patricia A Ormond	Patricia A Ormond	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005046	05/26/2009 18:36	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005047	05/26/2009 18:37	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005048	05/26/2009 18:37	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005049	05/26/2009 18:37	Patricia A Ormond	Patricia A Ormond	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005050	05/26/2009 18:37	Patricia A Ormond	Patricia A Ormond	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005051	05/26/2009 18:37	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005052	05/26/2009 18:38	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005053	05/26/2009 18:38	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005054	05/26/2009 18:38	Patricia A Ormond	Patricia A Ormond	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005055	05/26/2009 18:38	Patricia A Ormond	Patricia A Ormond	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005056	05/26/2009 18:38	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	check request &nland work invoice - pioneer litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005061	05/29/2009 11:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005062	05/29/2009 11:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005063	05/29/2009 11:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005064	05/29/2009 11:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005066	06/02/2009 16:15	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	May 19 2009 Cox & Smith invoice re Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005067	06/02/2009 16:15	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	May 19 2009 Cox & Smith invoice re Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005068	06/02/2009 16:15	Patricia A Ormond	Patricia A Ormond	May 19 2009 Cox & Smith invoice re Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005069	06/02/2009 16:15	Patricia A Ormond	Patricia A Ormond	May 19 2009 Cox & Smith invoice re Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005070	06/02/2009 16:15	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	May 19 2009 Cox & Smith invoice re Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005074	06/04/2009 21:40	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Patricia Ormond <salandman@yahoo.com>	FW: rev 1Proposal in re STS-doc.zip	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005075	06/05/2009 8:58	Patricia Ormond <salandman@yahoo.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Re: rev 1Proposal in re STS-doc.zip	Email with attachment	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 005076	06/05/2009 16:53	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Patricia Ormond <salandman@yahoo.com>	corrected draft Proposal in re STS-doc.zip	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005077	06/15/2009 10:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate: First Response to Disclosures.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005078	06/15/2009 10:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate: First Response to Disclosures.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005079	06/15/2009 10:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate: First Response to Disclosures.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005080	06/15/2009 10:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate: First Response to Disclosures.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005081	06/15/2009 10:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer-EOG - Answer and Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005082	06/15/2009 10:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer-EOG - Answer and Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005083	06/15/2009 10:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer-EOG - Answer and Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005084	06/15/2009 10:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>;Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer-EOG - Answer and Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005085	06/18/2009 15:45	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; jeremy x derington <jeremy.x.derington@jpmchase.com>	South Texas Syndicate_ First Response to Disclosures_2570526_1 (2) WITH NAMES-DOC.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005086	06/18/2009 15:45	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Jeremy X Derington <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate_ First Response to Disclosures_2570526_1 (2) WITH NAMES-DOC.zip	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005087	06/18/2009 16:21	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Pioneer's Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005088	06/18/2009 16:21	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Pioneer's Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005089	06/18/2009 16:21	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Pioneer's Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005090	06/18/2009 16:21	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Pioneer's Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005091	06/22/2009 17:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005092	06/22/2009 17:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005093	06/22/2009 17:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005094	06/22/2009 17:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005095	06/22/2009 20:57	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005096	06/22/2009 20:57	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005097	06/22/2009 20:57	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005098	06/22/2009 20:57	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Responses to Disclosures	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005099	06/22/2009 21:39	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005100	06/22/2009 21:39	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005101	06/22/2009 21:39	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005102	06/22/2009 21:39	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005103	06/24/2009 10:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005104	06/24/2009 10:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005105	06/24/2009 10:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	JPMorgan/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005106	06/24/2009 10:22	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	JPMorgan/Pioneer: Our Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005107	06/24/2009 12:42	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Pioneer/STS - discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005108	06/24/2009 12:42	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Pioneer/STS - discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005109	06/24/2009 12:42	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	Pioneer/STS - discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005110	06/24/2009 12:42	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	Pioneer/STS - discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005111	06/24/2009 12:49	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Bosell, Benjamin <bboosell@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Leasehold Title - Pioneer/EOG Reasonable Development Lawsuit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005112	06/24/2009 12:49	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Bosell, Benjamin <bboosell@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Leasehold Title - Pioneer/EOG Reasonable Development Lawsuit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005113	06/24/2009 12:49	Patricia A Ormond	Roth, David <dthroth@coxsmith.com>; Bosell, Benjamin <bboosell@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Leasehold Title - Pioneer/EOG Reasonable Development Lawsuit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005114	06/24/2009 16:16	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005115	06/24/2009 16:16	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005116	06/24/2009 16:16	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005117	06/24/2009 16:19	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005118	06/24/2009 16:19	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005119	06/24/2009 16:19	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005120	06/24/2009 16:19	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005121	06/24/2009 16:19	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005124	06/25/2009 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: STS's Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005125	06/25/2009 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: STS's Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005126	06/25/2009 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: STS's Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005127	06/25/2009 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: STS's Responses to Pioneer's Rogs and RFP.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005128	06/25/2009 11:57	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005129	06/25/2009 11:57	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	STS v. Pioneer et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005130	06/25/2009 11:57	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	STS v. Pioneer et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005131	06/25/2009 12:15	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS v. Pioneer et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005132	06/25/2009 12:15	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS v. Pioneer et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005133	06/25/2009 12:15	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	RE: STS v. Pioneer et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005136	06/26/2009 16:12	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005137	06/26/2009 16:12	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005138	06/26/2009 16:12	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005139	06/29/2009 12:14	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005140	06/29/2009 12:14	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005141	06/29/2009 12:14	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005142	06/29/2009 17:04	Patricia A Ormond	Patricia A Ormond	Verification for first set of interrogatories in re STS v. Pioneer et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005143	06/29/2009 17:04	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005144	06/29/2009 17:04	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005145	06/29/2009 17:04	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005146	06/29/2009 17:04	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005147	06/29/2009 18:02	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005148	06/29/2009 18:02	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005149	06/29/2009 18:02	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005150	06/29/2009 18:02	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005151	06/30/2009 17:28	Patricia A Ormond	Colleen Dean	South Texas Syndicate proposal II.doc	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005152	06/30/2009 17:28	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>	South Texas Syndicate proposal II.doc	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005153	07/01/2009 14:57	Patricia A Ormond	Colleen Dean		Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005154	07/01/2009 14:57	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Colleen Dean <Colleen.Dean@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005159	07/06/2009 18:35	Patricia A Ormond	Colleen Dean/John C Minter	South Texas Syndicate proposal III.doc.zip	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005162	07/07/2009 10:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Our Responses to Defendant EOG Resources, Inc.'s Interrogatories and Requests for Production	Email with attachment	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 005163	07/07/2009 10:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Our Responses to Defendant EOG Resources, Inc.'s Interrogatories and Requests for Production	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005164	07/07/2009 10:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer: Our Responses to Defendant EOG Resources, Inc.'s Interrogatories and Requests for Production	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005165	07/09/2009 11:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005166	07/10/2009 10:15	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Whiting Oil & Gas - Lease Inquiry	Email only	Pioneer/EOG litigation Lease negotiations	Attorney Client/ Work Product
JPM-PRIV 005167	07/10/2009 10:15	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Whiting Oil & Gas - Lease Inquiry	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005168	07/10/2009 10:34	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005169	07/10/2009 10:34	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005170	07/10/2009 14:17	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS v Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005171	07/10/2009 14:17	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: STS v Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005172	07/10/2009 14:17	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond	RE: STS v Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005173	07/10/2009 14:18	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Whiting Oil & Gas - Lease Inquiry	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005174	07/10/2009 16:47	Patricia A Ormond	Bertram Hayes-Davis;John C Minter; Colleen Dean;Kevin R Smith	Proposal for Third Party Management (STS)	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005175	07/10/2009 16:47	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	John C Minter <john.c.minter@jpmorgan.com>;bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>;Kevin R Smith <kevin.r.smith@jpmorgan.com>	Proposal for Third Party Management (STS)	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005177	07/14/2009 12:24	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005178	07/14/2009 12:24	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005180	07/14/2009 12:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005181	07/14/2009 12:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond	RE: Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005182	07/14/2009 12:52	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005183	07/14/2009 12:52	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005184	07/14/2009 12:52	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005185	07/14/2009 12:52	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Article on Eagle ford - see second page - references to STS acreage by Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005190	07/14/2009 18:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005191	07/14/2009 18:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005192	07/14/2009 18:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005193	07/14/2009 18:22	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005194	07/14/2009 18:22	Patricia A Ormond	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005195	07/14/2009 18:23	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005196	07/14/2009 18:23	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005199	07/14/2009 18:31	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005200	07/14/2009 18:31	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005201	07/14/2009 18:31	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005202	07/14/2009 18:31	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v. Pioneer/EOG: Correspondence from Pioneer re: discovery responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005205	07/15/2009 19:54	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	something I forgot	Email with attachment	Pioneer/EOG litigation / trust administration	Attorney Client/ Work Product
JPM-PRIV 005206	07/15/2009 19:54	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Wehmeyer, Corey <wehmeyer@coxsmith.com>	something I forgot	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005207	07/15/2009 19:54	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	something I forgot	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005210	07/17/2009 11:07	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	something I forgot	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005211	07/17/2009 11:07	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	something I forgot	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005212	07/17/2009 11:07	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	something I forgot	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005213	07/17/2009 19:14	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005214	07/17/2009 19:14	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co >	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005215	07/17/2009 19:14	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005216	07/17/2009 19:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005217	07/20/2009 11:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005218	07/20/2009 11:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005219	07/20/2009 11:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005220	07/20/2009 11:49	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005221	07/20/2009 11:49	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005222	07/20/2009 11:49	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005223	07/20/2009 12:06	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005224	07/20/2009 12:06	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005225	07/20/2009 12:06	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005226	07/20/2009 13:50	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005227	07/20/2009 13:50	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005228	07/20/2009 13:50	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005229	07/20/2009 13:56	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005230	07/20/2009 13:56	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005231	07/20/2009 13:56	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005232	07/20/2009 13:56	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005233	07/23/2009 10:10	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Pioneer/STS: Defendants' Discovery Responses	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005234	07/23/2009 10:10	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Rogs and RFP (first amended).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005235	07/23/2009 10:10	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Our Responses to Pioneer's Rogs and RFP (first amended).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005236	07/24/2009 10:25	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond		Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005237	07/24/2009 10:25	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005238	07/24/2009 11:46	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005239	07/24/2009 11:46	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005240	07/24/2009 11:46	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005241	07/24/2009 11:46	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005242	07/24/2009 14:12	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: Oil and Gas Investor article	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005243	07/24/2009 14:12	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: Oil and Gas Investor article	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005244	07/24/2009 14:30	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: Hawkville	Email only	Pioneer/EOG litigation / lease negotiations	Attorney Client/ Work Product
JPM-PRIV 005245	07/24/2009 15:42	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <droth@coxsmith.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>	STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005246	07/24/2009 15:42	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Roth, David <droth@coxsmith.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>	STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005247	07/24/2009 15:42	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond; Roth, David <droth@coxsmith.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>	STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005248	07/24/2009 15:42	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond; Roth, David <droth@coxsmith.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>	STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005249	07/24/2009 16:42	Patricia A Ormond	Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005250	07/24/2009 16:42	Patricia A Ormond	Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005251	07/24/2009 16:42	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005252	07/24/2009 16:42	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005253	07/24/2009 17:46	Patricia A Ormond	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: Hawkville	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005254	07/24/2009 17:46	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	FW: Hawkville	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005255	07/24/2009 18:56	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Our 07/23/2009 meeting and other matters including STS Litigation	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005256	07/24/2009 19:03	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS v Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005257	07/27/2009 11:13	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	FW: STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005258	07/27/2009 11:13	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Patricia A Ormond	FW: STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005259	07/27/2009 11:13	<wehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	FW: STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005260	07/27/2009 12:23	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com> Patricia Ormond <salandman@yahoo.com>	South Texas Syndicate proposal II.doc	Email with attachment	Trust administration / Pioneer/EOG litigation	Work Product
JPM-PRIV 005261	07/27/2009 12:23	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com> Patricia Ormond <salandman@yahoo.com>	South Texas Syndicate proposal II.doc	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005262	07/27/2009 12:36	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmyer, Corey <cwehmyer@coxsmith.com>	RE: STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005263	07/27/2009 12:36	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmyer, Corey <cwehmyer@coxsmith.com>	RE: STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005264	07/27/2009 12:36	Patricia A Ormond	Wehmyer, Corey <cwehmyer@coxsmith.com>	RE: STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005265	07/27/2009 12:36	Patricia A Ormond Wehmyer, Corey <cwehmyer@coxsmith.com>	Wehmyer, Corey <cwehmyer@coxsmith.com>	RE: STS/Pioneer: letter re: discovery objections.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005266	07/29/2009 16:51	Wehmyer, Corey <cwehmyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005267	07/29/2009 16:51	Wehmyer, Corey <cwehmyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005268	07/29/2009 16:51	Wehmyer, Corey <cwehmyer@coxsmith.com>	Patricia A Ormond	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005269	07/29/2009 16:51	Wehmyer, Corey <cwehmyer@coxsmith.com>	Patricia A Ormond	JPMorgan/Pioneer: Verification in support of ROGS (Pioneer).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005288	07/31/2009 10:33	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Wehmyer, Corey <cwehmyer@coxsmith.com>	FW: Verification	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005289	07/31/2009 10:37	Patricia A Ormond	Wehmyer, Corey <cwehmyer@coxsmith.com>	Letter to Beneficiaries re Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005301	08/07/2009 14:42	Wehmyer, Corey <cwehmyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Letter to Beneficiaries re Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005302	08/07/2009 14:42	Wehmyer, Corey <cwehmyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Letter to Beneficiaries re Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005303	08/07/2009 14:42	Wehmyer, Corey <cwehmyer@coxsmith.com>	Patricia A Ormond	Letter to Beneficiaries re Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005304	08/07/2009 15:28	Patricia A Ormond	Wehmyer, Corey <cwehmyer@coxsmith.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005305	08/07/2009 15:28	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005306	08/07/2009 15:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Re:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005307	08/11/2009 19:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Fw: Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005308	08/11/2009 20:03	Patricia A Ormond	Bertram Hayes-Davis Gary P. Aymes	STS Testifying Expert	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005309	08/11/2009 20:03	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS Testifying Expert	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005320	08/14/2009 16:36	Patricia A Ormond	Patricia Ormond <salandman@yahoo.com>	Disbursement Coding Sheet - Jlitigation fees 06112009.xls	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005321	08/17/2009 15:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005322	08/18/2009 11:33	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005323	08/18/2009 11:35	Gary P. Aymes	Patricia A Ormond	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005324	08/18/2009 11:50	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005325	08/18/2009 12:00	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005326	08/18/2009 12:02	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: STS Litigation	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005327	08/18/2009 12:06	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	FW: STS Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005328	08/18/2009 12:06	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	FW: STS Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005329	08/18/2009 12:06	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond	FW: STS Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005330	08/18/2009 12:06	Truss, Marty <jmtruss@coxsmith.com>	Patricia A Ormond	FW: STS Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005331	08/26/2009 14:04	Truss, Marty <jmtruss@coxsmith.com>	<neidell@worldnet.att.net>; Patricia A Ormond <patricia.a.ormond@jpmorgan.com>;Roth, David <dthroth@coxsmith.com>;Wehmeyer, Corey <cwehmeyer@coxsmith.com>	NAPE	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005332	08/26/2009 14:04	Truss, Marty <jmtruss@coxsmith.com>	<neidell@worldnet.att.net>; Patricia A Ormond <patricia.a.ormond@jpmorgan.com>;Roth, David <dthroth@coxsmith.com>;Wehmeyer, Corey <cwehmeyer@coxsmith.com>	NAPE	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005333	08/28/2009 11:20	Jenkins, Mirta <mjenkins@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	JPMorgan Chase Bank, N.A. vs. Pioneer Natural Resources et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005334	08/28/2009 11:20	Jenkins, Mirta <mjenkins@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	JPMorgan Chase Bank, N.A. vs. Pioneer Natural Resources et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005335	08/28/2009 11:20	Jenkins, Mirta <mjenkins@coxsmith.com>	Patricia A Ormond; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	JPMorgan Chase Bank, N.A. vs. Pioneer Natural Resources et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005336	08/28/2009 11:20	Jenkins, Mirta <mjenkins@coxsmith.com>	Patricia A Ormond; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	JPMorgan Chase Bank, N.A. vs. Pioneer Natural Resources et al	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005337	09/02/2009 22:00	Patricia Ormond <salandman@yahoo.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation / trust administration	Work Product
JPM-PRIV 005338	09/04/2009 16:42	Patricia A Ormond	Moore, James TWehmeyer, Corey <cwehmeyer@coxsmith.com>	Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005339	09/04/2009 16:42	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Moore, James T <james.t.moore@jpmchase.com>;Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005340	09/04/2009 16:46	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005341	09/18/2009 19:27	Patricia A Ormond	Patricia Ormond <salandman@yahoo.com>	jpm k	Email with attachment	Pioneer/EOG settlement / trust administration	Work Product
JPM-PRIV 005342	09/21/2009 18:52	Patricia A Ormond	Gary P. Aymes	FW: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005343	09/21/2009 18:52	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Invoice	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005344	09/21/2009 18:59	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Moore, James T <james.t.moore@jpmchase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005345	09/22/2009 15:10	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.com>	Stephen H McCauley <stephen.h.mccauley@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005346	09/22/2009 15:12	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005347	09/23/2009 11:53	Patricia A Ormond	Sherry Harrison	RE: Invoice paid - South Texas Syndicate Trust	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005348	09/23/2009 11:53	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: Invoice paid - South Texas Syndicate Trust	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005349	09/23/2009 14:17	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005350	09/23/2009 14:18	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005351	09/23/2009 14:18	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005352	09/23/2009 14:20	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005353	09/24/2009 8:28	Patricia Ormond <salandman@yahoo.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Fw: Pioneer/STS	Email with attachment	Pioneer/EOG litigation / settlement	Attorney Client/ Work Product
JPM-PRIV 005354	09/24/2009 8:28	Patricia Ormond <salandman@yahoo.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>	Fw: Pioneer/STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005355	09/25/2009 12:48	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>>Gary J Sorrentino <gary.j.sorrentino@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: E-Mails	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005356	09/25/2009 12:51	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: E-Mails	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005357	09/25/2009 12:51	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: E-Mails	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005358	09/30/2009 17:04	Patricia A Ormond	Patricia Ormond <salandman@yahoo.com>	Emailing: reviewedMasterLandServicesContract- concept Edited 9 14-dcc.zip	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005359	09/30/2009 17:04	Patricia A Ormond (patricia.a.ormond@jpmorgan.com) <patricia.a.ormond@corpexchange.co m>	Patricia Ormond <salandman@yahoo.com>	Emailing: reviewedMasterLandServicesContract- concept Edited 9 14-dcc.zip	Email with attachment	Pioneer/EOG litigation	Work Product

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005360	10/14/2009 11:57	Moore, James T <james.t.moore@jpmchase.com>	Patricia A Ormond <patricia.a.ormond@jpmorgan.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Privileged and Confidential: RE: Incident Id: XXXXXX- I need to know who to talk to about locating any deleted emails concerning the subject of a lawsuit we have filed on behalf of one of our clients.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005363	06/10/2009 19:10	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: corrected draft Proposal in re STS-doc.zip	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005364	09/04/2009 11:06	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: Master Land Services - Concept Energy & JPM	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005365	10/21/2009 14:25	Kelly Crissinger <kelly.crisinger@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com> <bertram.hayes-davis@jpmorgan.com>	FW: Pattie Ormond contract	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005366	10/29/2009 11:36	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Joann M Sparrow <joann.m.sparrow@jpmchase.com>, Kevin R Smith <kevin.r.smith@jpmorgan.com>	Patricia Schultz- Ormond . Concept Energy Management Inc	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005367	11/24/2009 17:09	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Patricia Ormond <salandman@yahoo.com>	Re: Master Land Services Agreement	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005368	11/24/2009 17:23	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Master Land Services Agreement	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005369	11/25/2009 19:05	Patricia Ormond <salandman@yahoo.com>	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Re: STS letter	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005371	12/24/2009 13:49	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005372	12/24/2009 14:33	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005373	12/24/2009 14:34	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005374	12/28/2009 19:40	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005375	12/28/2009 19:41	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005376	12/29/2009 9:13	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005377	12/29/2009 12:08	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pattie	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005391	04/15/2010 15:29	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	John C Minter <john.c.minter@jpmorgan.com>	Re: STS....	Email only	Beneficiary communications Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005393	04/23/2010 17:06	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005409	05/13/2010 16:28	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: Follow-up From Last Week's Meeting	Email with attachment	Pioneer/EOG litigation Trust valuation Trust administration Tax issues	Attorney Client/ Work Product
JPM-PRIV 005411	05/13/2010 16:30	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Wendy M Flatt <wendy.m.flatt@jpmorgan.com>	FW: Follow-up From Last Week's Meeting	Email with attachment	Pioneer/EOG litigation Trust valuation Trust administration Tax issues	Attorney Client/ Work Product
JPM-PRIV 005421	05/26/2010 12:50	Debra M Round <debra.m.round@jpmorgan.com>	Aaron J Reber <aaron.j.reber@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Richard G Hugo <richard.g.hugo@jpmorgan.com>Steven L Faulkner <steven.l.faulkner@jpmorgan.com>	RE: South Texas Syndicate List of Items/Issues	Email with attachment	Pioneer/EOG litigation Trust administration	Attorney Client/ Work Product
JPM-PRIV 005422	05/26/2010 16:26	Debra M Round <debra.m.round@jpmorgan.com>	Aaron J Reber <aaron.j.reber@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Richard G Hugo <richard.g.hugo@jpmorgan.com>Steven L Faulkner <steven.l.faulkner@jpmorgan.com>	RE: South Texas Syndicate List of Items/Issues	Email with attachment	Pioneer/EOG litigation Trust administration	Attorney Client/ Work Product
JPM-PRIV 005426	06/02/2010 9:59	Debra M Round <debra.m.round@jpmorgan.com>	Aaron J Reber <aaron.j.reber@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Richard G Hugo <richard.g.hugo@jpmorgan.com>Steven L Faulkner <steven.l.faulkner@jpmorgan.com>	RE: South Texas Syndicate List of Items/Issues	Email with attachment	Pioneer/EOG litigation Trust administration	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005427	06/02/2010 12:52	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Debra M Round <debra.m.round@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: Pioneer/STS - dismissal question	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005428	06/02/2010 12:52	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Debra M Round <debra.m.round@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: Pioneer/STS - dismissal question	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005433	06/15/2010 17:01	Debra M Round <debra.m.round@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Richard G Hugo <richard.g.hugo@jpmorgan.com>	STS Review call Thursday	Email only	Pioneer/EOG litigation Tax opinion Trust Audit Trust structures/alternatives	Attorney Client
JPM-PRIV 005439	06/17/2010 19:16	Debra M Round <debra.m.round@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Richard G Hugo <richard.g.hugo@jpmorgan.com>	RE: STS Call Friday, June 18	Email with attachment	Pioneer/EOG litigation Trust administration	Attorney Client/ Work Product
JPM-PRIV 005446	06/30/2010 15:00	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Colleen Dean <Colleen.Dean@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; John C Minter <john.c.minter@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Richard G Hugo <richard.g.hugo@jpmorgan.com>	Cox & Smith fees	Email with attachment	Tax opinion Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005460	07/21/2010 16:35	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	bertram.hayes-davis@jpmorgan.com	FW: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005461	07/21/2010 16:48	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005462	07/21/2010 16:48	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	RE: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005463	07/21/2010 16:50	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005464	07/21/2010 16:53	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005465	07/22/2010 9:16	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS v. Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005468	07/27/2010 9:57	Colleen Dean <Colleen.Dean@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	FW: STS v. Pioneer..	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005469	07/27/2010 12:00	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: STS v. Pioneer..	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005479	09/10/2010 11:09	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Herb J Sliger <herb.j.sliger@jpmchase.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Richard G Hugo <richard.g.hugo@jpmorgan.com>Susan Kraivik <SUSAN.KRAVIK@chase.com>	RE: STS - Invoice summary	Email with attachment	Tax opinion Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005480	09/10/2010 11:09	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Herb J Sliger <herb.j.sliger@jpmchase.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Richard G Hugo <richard.g.hugo@jpmorgan.com>Susan Kraivik <SUSAN.KRAVIK@chase.com>	RE: STS - Invoice summary	Email with attachment	Tax opinion Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005481	09/10/2010 14:24	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	Re: STS Tax Opinion - Legal invoices from Cox & Smith on Matter No. 001674.000151	Email only	Tax opinion Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005483	09/13/2010 9:11	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Richard G Hugo <richard.g.hugo@jpmorgan.com>	FW: STS Tax Opinion - Legal invoices from Cox & Smith on Matter No. 001674.000151	Email only	Tax opinion Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005486	09/14/2010 12:19	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com> Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>	RE: Updated STS Memorandum and Addendum	Email with attachment	Pioneer/EOG litigation Trust administration	Attorney Client/ Work Product
JPM-PRIV 005531	10/07/2010 18:19	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Claire A Shaw <claire.a.shaw@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>Linda S Zinck <linda.s.zinck@jpmorgan.com>Patrick J Pacheco <patrick.j.pacheco@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS Meeting Follow-Up	Email only	Pioneer/EOG litigation Tax issues Tax opinion Trust Valuation Trust structures/alternatives	Attorney Client



<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>						
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u> <u>Privilege</u>
JPM-PRIV 005532	10/07/2010 18:29	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Claire A Shaw <claire.a.shaw@jpmorgan.com>	RE: STS Meeting Follow-Up	Email only	Pioneer/EOG litigation Tax issues Trust opinion Trust Valuation Trust structures/alternatives Attorney Client
JPM-PRIV 005533	10/07/2010 18:37	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Herb J Sliger <herb.j.sliger@jpmchase.com>; Claire A Shaw <claire.a.shaw@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS Meeting Follow-Up	Email only	Pioneer/EOG litigation Tax issues Trust opinion Trust Valuation Trust structures/alternatives Attorney Client
JPM-PRIV 005540	11/17/2010 14:57	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005541	11/17/2010 14:57	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005542	11/17/2010 14:57	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005543	11/17/2010 14:59	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005544	11/17/2010 14:59	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation Attorney Client
JPM-PRIV 005545	11/17/2010 14:59	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005546	11/17/2010 15:42	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Herb J Sliger <herb.j.sliger@jpmchase.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005547	12/01/2010 16:10	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005548	12/01/2010 16:10	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005549	12/01/2010 16:10	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005550	12/01/2010 16:29	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005551	12/01/2010 16:29	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005552	12/01/2010 16:29	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005553	12/02/2010 11:43	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005554	12/02/2010 11:43	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	FW: STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005556	12/15/2010 18:10	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005557	12/15/2010 18:10	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005558	12/15/2010 18:10	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com>	FW: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005559	12/15/2010 21:15	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Tompkins, H <h.t.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Fw: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005560	12/16/2010 14:50	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005561	12/16/2010 14:50	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005564	12/23/2010 14:21	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: Development Litigation against EOG and Pioneer - Mediation Date - Wednesday 19 January - Dallas	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005569	01/26/2011 6:46	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: final settlement FW: South Texas Syndicate Trust v. Pioneer and EOG	Email only	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005576	03/11/2011 11:24	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email only	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 005577	03/11/2011 11:32	Susan Kravik <susan.kravik@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005578	03/11/2011 11:32	Susan Kravik <susan.kravik@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005579	03/11/2011 11:32	Susan Kravik <SUSAN.KRAVIK@chase.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 005580	03/11/2011 11:38	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005581	03/11/2011 11:38	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005582	03/11/2011 11:38	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005583	03/11/2011 11:39	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005584	03/11/2011 11:39	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 005585	03/11/2011 11:39	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005586	03/14/2011 10:10	Susan Kravik <susan.kravik@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Herb J Sliger <herb.j.sliger@jpmchase.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: March STS Memo	Email with attachment	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 005587	03/14/2011 10:27	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: March STS Memo	Email with attachment	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 005588	03/17/2011 11:33	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	STS fee on Settlement?	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005598	05/27/2011 12:56	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>; Aaron J Reber <aaron.j.reber@jpmorgan.com>Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Terry, Douglas A <douglas.a.terry@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: South Texas Syndicate - Drafts	Email with attachment	Pioneer/EOG litigation Trust administration	Attorney Client
JPM-PRIV 005599	05/27/2011 12:56	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>; Aaron J Reber <aaron.j.reber@jpmorgan.com>Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Debra M Round <debra.m.round@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Terry, Douglas A <douglas.a.terry@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: South Texas Syndicate - Drafts	Email with attachment	Pioneer/EOG litigation Trust administration	Attorney Client/ Work Product
JPM-PRIV 005600	06/06/2011 12:07	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS conference call AGENDA 6/2/11	Email with attachment	Trust Audit Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005601	06/06/2011 12:07	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS conference call AGENDA 6/2/11	Email with attachment	Trust Audit Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005604	06/07/2011 9:51	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Footnote to 2010 annual report	Email only	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 005605	06/07/2011 9:58	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	RE: Footnote to 2010 annual report	Email only	Pioneer/EOG settlement Trust administration	Attorney Client/ Work Product
JPM-PRIV 005606	06/07/2011 10:07	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>; Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: Footnote to 2010 annual report	Email only	Trust administration Trust Audit	Attorney Client/ Work Product
JPM-PRIV 005607	06/07/2011 10:33	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>	RE: Footnote to 2010 annual report	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005615	12/02/2009 16:39	Colleen Dean <colleen.dean@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005616	12/02/2009 16:39	Colleen Dean <colleen.dean@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005617	12/02/2009 16:39	Colleen Dean <Colleen.Dean@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Pioneer/STS - Discovery from Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005618	12/03/2009 18:31	Patricia Ormond <salandman@yahoo.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	January	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005619	12/10/2009 19:55	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005620	12/11/2009 9:00	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: South Texas Syndicate / Pioneer Natural Resources	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005621	12/28/2009 15:53	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005622	12/28/2009 15:53	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: STS Depos Next Week	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005626	01/05/2010 16:52	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Deposition and pre-deposition meeting	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005627	01/05/2010 16:52	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Deposition and pre-deposition meeting	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005628	01/05/2010 16:52	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Deposition and pre-deposition meeting	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005629	01/05/2010 16:52	Wehmeyer, Corey <wehmeyer@coxsmith.com>	h.i.tompkins@jpmorgan.com <h.i.tompkins@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Deposition and pre-deposition meeting	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005630	01/06/2010 14:36	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Re: Pioneer/STS - Deposition and pre-deposition meeting	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005631	01/06/2010 14:36	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: Pioneer/STS - Deposition and pre-deposition meeting	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005632	01/06/2010 14:36	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: Pioneer/STS - Deposition and pre-deposition meeting	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005636	01/11/2010 12:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005637	01/11/2010 12:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005638	01/11/2010 12:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005639	01/11/2010 12:25	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	<cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005640	01/11/2010 12:25	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	<cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005641	01/11/2010 13:02	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005642	01/11/2010 13:02	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005643	01/11/2010 13:02	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005644	01/11/2010 13:03	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	<h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005645	01/11/2010 13:03	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	<h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005646	01/11/2010 20:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005647	01/11/2010 20:11	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005648	01/11/2010 23:41	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005649	01/11/2010 23:41	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Re: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005650	01/11/2010 23:41	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Re: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005651	01/12/2010 7:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005652	01/12/2010 7:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005653	01/12/2010 7:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005654	01/12/2010 7:20	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: JPMorgan/Pioneer: Ormond deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005655	01/12/2010 18:27	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS attorneys' fees	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005656	01/12/2010 18:27	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS attorneys' fees	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005660	01/13/2010 16:44	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Offer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005666	01/20/2010 9:16	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Objections to Corporate Representative and Custodian of Records Topics and Document Requests	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005667	01/20/2010 9:16	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Objections to Corporate Representative and Custodian of Records Topics and Document Requests	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005668	01/25/2010 9:46	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005669	01/25/2010 9:46	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005670	01/25/2010 9:46	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005671	01/25/2010 12:55	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	JPMorgan/Pioneer: Settlement proposal to Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005672	01/25/2010 12:55	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	JPMorgan/Pioneer: Settlement proposal to Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005673	01/25/2010 12:55	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	JPMorgan/Pioneer: Settlement proposal to Pioneer/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>						
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>  <u>Privilege</u>
JPM-PRIV 005674	01/25/2010 15:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005675	01/25/2010 15:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005676	01/25/2010 15:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: royalty payment information	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005677	01/25/2010 21:03	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Pioneer Production	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005678	01/25/2010 21:03	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Pioneer Production	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005679	01/26/2010 15:49	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005680	01/26/2010 15:53	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005681	01/26/2010 15:53	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005682	01/26/2010 16:18	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Frank L Medrano <frank.l.medrano@jpmorgan.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005683	01/26/2010 16:18	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Frank L Medrano <frank.l.medrano@jpmorgan.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005684	01/26/2010 16:18	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Frank L Medrano <frank.l.medrano@jpmorgan.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005685	01/26/2010 19:20	Niven, Allen L (allen.l.niven@jpmchase.com) <allen.l.niven@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer Production	Email with attachment	Pioneer/EOG litigation Work Product
JPM-PRIV 005686	01/26/2010 20:04	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>		Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 005687	01/26/2010 20:04	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>		Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product



**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005688	01/26/2010 20:42	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Pioneer/EOG - Privileged	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005689	01/26/2010 20:42	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Pioneer/EOG - Privileged	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005690	01/26/2010 20:42	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Pioneer/EOG - Privileged	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005691	01/27/2010 10:55	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Frank L Medrano <frank.l.medrano@jpmorgan.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005692	01/27/2010 10:55	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Frank L Medrano <frank.l.medrano@jpmorgan.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005693	01/27/2010 10:55	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Frank L Medrano <frank.l.medrano@jpmorgan.com>	FW: Pioneer Production	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005694	01/28/2010 14:24	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>; Tompkins, H <h.l.tompkins@jpmchase.com>	Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005695	01/28/2010 14:24	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>; Tompkins, H <h.l.tompkins@jpmchase.com>	Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005696	01/28/2010 14:58	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005697	01/28/2010 14:58	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Revenue Spreadsheets STS Cullen Lease	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005698	01/28/2010 15:08	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005699	01/28/2010 15:08	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005700	01/28/2010 15:08	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005701	01/28/2010 16:50	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>; Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005702	01/28/2010 16:50	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehnmeyer, Corey <cwehnmeyer@coxsmith.com>; Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005703	01/28/2010 16:50	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005704	01/28/2010 16:52	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005705	01/28/2010 16:52	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005706	01/28/2010 17:08	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005707	01/28/2010 17:08	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005708	01/28/2010 17:13	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005709	01/28/2010 17:13	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005710	01/28/2010 17:13	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Re: STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005711	02/03/2010 12:00	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005712	02/03/2010 12:00	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005713	02/03/2010 12:23	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005715	02/03/2010 12:23	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005716	02/03/2010 14:13	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005717	02/03/2010 14:13	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; Wehmeyer, Corey <wehmeyer@coxsmith.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005723	02/16/2010 9:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: EOD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005724	02/16/2010 9:43	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005725	02/16/2010 9:43	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005726	02/16/2010 9:43	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005727	02/16/2010 9:43	Roth, David <dthroth@coxsmith.com>	h.i.tompkins@jpmorgan.com <h.i.tompkins@jpmorgan.com>	Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005728	02/16/2010 10:16	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	FW: EOD Invoice for Cox Smith	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005729	02/16/2010 13:14	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005730	02/16/2010 13:14	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005731	02/16/2010 13:14	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005732	02/16/2010 14:09	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005733	02/16/2010 14:09	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005734	02/16/2010 14:09	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Litigation with PDX and EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005735	02/19/2010 8:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005736	02/19/2010 8:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Agreement to Be Bound	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005737	02/19/2010 11:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005738	02/19/2010 11:10	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005739	02/22/2010 22:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005740	02/22/2010 22:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - royalty information	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005741	03/10/2010 18:23	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005742	03/10/2010 18:23	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005743	03/10/2010 18:23	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005744	03/10/2010 18:23	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005745	03/19/2010 12:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005746	03/19/2010 12:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005747	03/19/2010 12:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005748	03/19/2010 15:02	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005749	03/19/2010 15:02	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005750	03/19/2010 15:02	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005751	03/19/2010 15:24	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005752	03/19/2010 15:24	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005753	03/19/2010 15:24	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005754	03/19/2010 15:43	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005755	03/19/2010 15:43	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005756	03/19/2010 15:43	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Settlement Proposal - STS v. PXD/EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005757	03/19/2010 17:10	Tompkins, H (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	FW: Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005758	03/19/2010 17:10	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	FW: Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005759	03/19/2010 17:10	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	FW: Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005760	03/19/2010 17:10	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	FW: Settlement Proposal - STS v. PXD/EOG - Draft 3 March	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005761	03/23/2010 9:53	Anderson, Sheri <Sheri.Anderson@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: PSO	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005762	03/23/2010 10:02	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Anderson, Sheri <Sheri.Anderson@jpmorgan.com>	RE: PSO	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005763	03/26/2010 15:17	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Anderson, Sheri (Sheri.Anderson@jpmorgan.com) <sher_i.anderson@corpexchange.com>	FW: Pattie Status	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005764	03/29/2010 17:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Proposed Seismic Permit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005765	03/29/2010 17:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Proposed Seismic Permit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005766	03/29/2010 17:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Proposed Seismic Permit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005767	03/29/2010 17:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	h.i.tompkins@jpmorgan.com <h.i.tompkins@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Proposed Seismic Permit	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005768	03/29/2010 17:39	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS/Pioneer - Proposed Seismic Permit	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005769	03/30/2010 12:22	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Settlement Discussions	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005770	03/31/2010 15:09	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005771	03/31/2010 15:09	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005772	03/31/2010 15:09	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005773	03/31/2010 15:09	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	h.i.tompkins@jpmorgan.com <h.i.tompkins@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005774	04/01/2010 15:51	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005775	04/01/2010 15:51	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005776	04/01/2010 15:51	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005777	04/01/2010 17:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005778	04/01/2010 17:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005779	04/01/2010 17:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005780	04/01/2010 17:43	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005781	04/01/2010 17:43	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005782	04/01/2010 17:43	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: JPMorgan/STS - Letter Rangel re: seismic shoot.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005783	04/02/2010 8:35	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	FW: Invoice and Planning	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005784	04/02/2010 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS - Invoice from Ormond	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005785	04/02/2010 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS - Invoice from Ormond	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005786	04/02/2010 10:06	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS - Invoice from Ormond	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005787	04/05/2010 16:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaimerangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Seismic Permit	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement
JPM-PRIV 005788	04/05/2010 16:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaimerangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Seismic Permit	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005789	04/05/2010 16:07	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaime.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Seismic Permit	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005790	04/06/2010 14:54	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Truss, Marty <jmtruss@coxsmith.com>	Re: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005791	04/07/2010 15:43	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005792	04/07/2010 16:20	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Truss, Marty <jmtruss@coxsmith.com>	RE: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005793	04/07/2010 17:29	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005794	04/07/2010 17:29	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005795	04/07/2010 18:23	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Truss, Marty <jmtruss@coxsmith.com>	RE: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005796	04/07/2010 18:27	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005797	04/07/2010 18:27	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	Re: Settlement Discussions	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005798	04/08/2010 18:55	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS - Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005799	04/08/2010 18:55	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS - Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005800	04/08/2010 18:55	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS - Pioneer Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005801	04/09/2010 22:08	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Amended Acreage toward PXD Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005802	04/09/2010 22:08	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Amended Acreage toward PXD Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 005803	04/12/2010 9:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaime.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Seismic Permit	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 005804	04/12/2010 9:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaime.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Seismic Permit	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 005805	04/12/2010 9:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaime.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Seismic Permit	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 005806	04/13/2010 14:01	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005807	04/13/2010 14:01	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005808	04/13/2010 14:01	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005816	04/14/2010 16:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jenkins, Mirta <mjenkins@coxsmith.com>Roth, David <dthroth@coxsmith.com>Tompkins, H <h.i.tompkins@jpmchase.com>Truss, Marty <jmtruss@coxsmith.com>	FW: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005817	04/14/2010 16:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jenkins, Mirta <mjenkins@coxsmith.com>Roth, David <dthroth@coxsmith.com>Tompkins, H <h.i.tompkins@jpmchase.com>Truss, Marty <jmtruss@coxsmith.com>	FW: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005818	04/14/2010 16:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jenkins, Mirta <mjenkins@coxsmith.com>Roth, David <dthroth@coxsmith.com>Tompkins, H <h.i.tompkins@jpmchase.com>Truss, Marty <jmtruss@coxsmith.com>	FW: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 005819	04/14/2010 16:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jenkins, Mirta <mjenkins@coxsmith.com>Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>h.i.tompkins@jpmorgan.com <h.i.tompkins@jpmorgan.com>	FW: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 005820	04/14/2010 16:20	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005821	04/14/2010 16:20	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005822	04/14/2010 16:20	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005823	04/14/2010 16:24	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005824	04/14/2010 16:24	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 005825	04/14/2010 16:24	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 005826	04/14/2010 16:33	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005827	04/14/2010 16:33	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005828	04/14/2010 16:33	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS v. Pioneer, et al.	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005829	04/15/2010 10:58	Joe Finger <jmfinger49@aol.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Re: PXD PLAT	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005830	04/15/2010 11:02	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Joe Finger <jmfinger49@aol.com>	RE: PXD PLAT	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005831	04/19/2010 13:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product



EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005832	04/19/2010 13:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005833	04/19/2010 13:37	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005834	04/19/2010 14:48	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Joe Finger <jmfinger49@aol.com>	RE: Draft of plat	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005835	04/19/2010 16:53	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005836	04/19/2010 16:53	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005837	04/19/2010 16:53	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005838	04/19/2010 19:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005839	04/19/2010 19:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005840	04/19/2010 19:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005841	04/19/2010 19:21	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005842	04/19/2010 19:21	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005843	04/19/2010 19:21	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005844	04/20/2010 11:04	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005845	04/20/2010 11:04	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005846	04/20/2010 11:04	Truss, Marty <jmtruss@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: STS - PXD and EOG Settlement Proposal - Attorney Client Privileged.	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005847	04/20/2010 17:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	<hfeldt@stx.rr.com>; Becky Miller <bmiller@scottsdoug.com>; Jaime Rangel <jaime.rangel@rangellaw.com>; Jorge C. Rangel <jorge.c.rangel@rangellaw.com>; Mark Hanna <mhanna@scottsdoug.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005848	04/20/2010 17:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	<hfeldt@stx.rr.com>; Becky Miller <bmiller@scottdoug.com>; Jaime Rangel <jaime.rangel@rangellaw.com>; Jorge C. Rangel <jorge.c.rangel@rangellaw.com>; Mark Hanna <mhanna@scottdoug.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 005853	04/21/2010 10:23	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005854	04/21/2010 10:23	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Second Discovery from EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005855	04/23/2010 17:06	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005856	04/23/2010 17:06	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPMorgan/STS	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 005868	04/30/2010 12:26	H L Tompkins	Frank L Medrano <frank.l.medrano@jpmorgan.com>	Re: FedEx & notebook	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005871	05/05/2010 17:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005872	05/05/2010 17:32	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/STS/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005876	05/10/2010 14:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005883	05/11/2010 12:20	H L Tompkins	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005884	05/11/2010 12:20	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005885	05/11/2010 12:20	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG discovery	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005886	05/11/2010 15:02	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Ann E Tyler <ann.e.tyler@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>	Pioneer Discovery Response - Royalty payments received 2000 - 2005	Email with attachment	Pioneer/EOG litigation	Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005887	05/11/2010 15:02	Tompkins, H L <h.l.tompkins@jpmchase.com> <h.l.tompkins@corpexchange.com>	Ann E Tyler <ann.e.tyler@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>	Pioneer Discovery Response - Royalty payments received 2000 - 2005	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005888	05/11/2010 15:02	Tompkins, H L <h.l.tompkins@jpmchase.com> <h.l.tompkins@corpexchange.com>	Ann E Tyler <ann.e.tyler@jpmorgan.com>; Anderson, Sheri <Sheri.Anderson@jpmorgan.com>	Pioneer Discovery Response - Royalty payments received 2000 - 2005	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005889	05/11/2010 15:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Debra M Round <debra.m.round@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>	STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005890	05/11/2010 15:59	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Debra M Round <debra.m.round@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>	STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005909	05/18/2010 10:09	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005910	05/18/2010 10:09	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005911	05/18/2010 10:09	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005912	05/18/2010 17:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Glen McFarlane <Glen.McFarlane@jpmchase.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005913	05/18/2010 17:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Glen McFarlane <Glen.McFarlane@jpmchase.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005914	05/18/2010 20:41	Glen McFarlane <glen.mcfarlane@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005915	05/18/2010 20:41	Glen McFarlane <glen.mcfarlane@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 005916	05/18/2010 20:41	Glen McFarlane <Glen.McFarlane@jpmchase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005931	05/20/2010 21:17	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.l.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to EOG Rogs and RFP (second set ).DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005932	05/20/2010 21:17	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMorgan/Pioneer: Our Responses to EOG Rogs and RFP (second set ),DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005947	05/25/2010 17:40	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005948	05/25/2010 17:40	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Work Product
JPM-PRIV 005949	05/25/2010 17:40	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005950	05/25/2010 17:52	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Jason R Beck <jason.r.beck@corpexchange.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005951	05/25/2010 18:06	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	RE: PXD Discovery on San Antonio Shared Drive	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005957	05/28/2010 9:14	Debra M Round <debra.m.round@jpmorgan.com>	Colleen Dean <Colleen.Dean@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Beck, Jason R <jason.r.beck@jpmorgan.com>	RE: STS e-mails	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005959	06/02/2010 12:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005960	06/02/2010 12:16	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer, et al.	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005962	06/04/2010 17:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005963	06/04/2010 17:08	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005964	06/04/2010 20:09	Truss, Marty <jmtruss@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Re: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005965	06/04/2010 20:09	Truss, Marty <jmtruss@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Re: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 005966	06/04/2010 20:09	Truss, Marty <jmtruss@coxsmith.com> Rosario C Calvillo <rosario.c.calvillo@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Re: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 005973	06/08/2010 14:11	Tompkins, H <h.i.tompkins@jpmchase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Beck, Jason R <jason.r.beck@jpmorgan.com>	RE: PSO MO ACT RPTS 2007-2009	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 005974	06/08/2010 14:12	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Rosario C Calvillo <rosario.c.calvillo@jpmorgan.com>	RE: PSO MO ACT RPTS 2007-2009	Email only	Pioneer/EOG litigation	Work Product
JPM-PRIV 006048	07/12/2010 10:46	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006049	07/12/2010 10:46	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006050	07/12/2010 10:46	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: EOG discovery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006051	07/12/2010 14:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Bertra	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006052	07/12/2010 14:00	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Bertra	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006053	07/12/2010 15:55	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Be	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006054	07/12/2010 15:55	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Be	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006055	07/12/2010 17:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	FW: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006056	07/12/2010 17:17	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	FW: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006057	07/12/2010 17:17	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006058	07/12/2010 17:38	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Be	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006059	07/12/2010 17:38	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Be	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006060	07/12/2010 17:38	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of Gary Aymes.DOC;Pioneer/STS: Affidavit of Sherry Anderson.DOC;Pioneer/STS: Affidavit of Sara Bender.DOC;Pioneer/STS: Affidavit of H.L. Tompkins.DOC;Pioneer/STS: Affidavit of Charlotte Ray.DOC;Pioneer/STS: Affidavit of Be	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006061	07/12/2010 17:38	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Sara A Bender <sara.a.bender@jpmchase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	JPMorgan/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006062	07/12/2010 17:38	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Sara A Bender <sara.a.bender@jpmchase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	JPMorgan/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006063	07/12/2010 17:42	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006064	07/12/2010 17:42	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006065	07/12/2010 17:42	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006066	07/12/2010 17:43	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006067	07/12/2010 17:43	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006068	07/12/2010 17:43	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006069	07/12/2010 17:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006070	07/12/2010 17:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006071	07/12/2010 17:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006072	07/12/2010 17:45	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006073	07/12/2010 17:45	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006074	07/12/2010 17:45	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS - depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006075	07/12/2010 17:45	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006076	07/12/2010 17:45	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006077	07/12/2010 17:45	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006078	07/12/2010 17:47	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006079	07/12/2010 17:47	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006080	07/12/2010 17:47	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006081	07/12/2010 17:49	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006082	07/12/2010 17:49	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006083	07/12/2010 17:49	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006084	07/12/2010 17:51	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehnmeyer, Corey <wehnmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006085	07/12/2010 17:51	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006086	07/12/2010 17:51	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006087	07/12/2010 17:52	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006088	07/12/2010 17:52	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006089	07/12/2010 17:52	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006090	07/12/2010 18:02	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006091	07/12/2010 18:02	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006092	07/12/2010 18:02	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006093	07/12/2010 18:04	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006094	07/12/2010 18:04	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006095	07/12/2010 18:04	Wehmeyer, Corey <wehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006096	07/12/2010 18:05	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006097	07/12/2010 18:05	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006098	07/12/2010 18:05	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com> Wehmeyer, Corey <wehmeyer@coxsmith.com> <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>	RE: Pioneer/STS: Affidavit of H.L. Tompkins.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006099	07/13/2010 7:28	Sara A Bender <z228259@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com> Wehmeyer, Corey <wehmeyer@coxsmith.com> <Gary.P.Aymes@jpmorgan.com>	RE: JPMorgan/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006100	07/13/2010 7:28	Sara A Bender <z228259@corpexchange.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com> Wehmeyer, Corey <wehmeyer@coxsmith.com> <Gary.P.Aymes@jpmorgan.com>	RE: JPMorgan/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006101	07/13/2010 7:28	Sara A Bender <sara.a.bender@jpmchase.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com> Wehmeyer, Corey <wehmeyer@coxsmith.com> <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>	RE: JPMorgan/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>						
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u> <u>Privilege</u>
JPM-PRIV 006112	07/15/2010 14:43	Anderson, Sheri <Sheri.Anderson@jpmorgan.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	FW: AFFIDAVIT	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006116	07/16/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS/Pioneer: Response to Motion to Compel	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006117	07/16/2010 18:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	STS/Pioneer: Response to Motion to Compel	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006119	07/22/2010 9:20	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	FW: STS v. Pioneer	Email only	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006120	07/26/2010 14:08	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	Friday	Email only	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006121	07/26/2010 14:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Friday	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006122	08/02/2010 10:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>	FW: STS/Pioneer - Global Seismic Permit; Intrepid Project	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006123	08/02/2010 10:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>	FW: STS/Pioneer - Global Seismic Permit; Intrepid Project	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006124	08/02/2010 10:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>	FW: STS/Pioneer - Global Seismic Permit; Intrepid Project	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation Confidential/Settlement Agreements
JPM-PRIV 006125	08/02/2010 16:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	PXD Discovery Request	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006126	08/02/2010 16:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	PXD Discovery Request	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006127	08/02/2010 16:44	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	PXD Discovery Request	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006129	08/03/2010 13:11	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: PXD Discovery Request	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006130	08/04/2010 10:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>	Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006131	08/04/2010 10:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>	Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006132	08/04/2010 10:41	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Roth, David <dthroth@coxsmith.com>	Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006133	08/04/2010 10:50	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com> Roth, David <dthroth@coxsmith.com>	RE: Letter to Jaime R. Rangel.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006134	08/04/2010 15:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	Petroleum Engineering Expert	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006135	08/04/2010 15:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	Petroleum Engineering Expert	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006136	08/04/2010 15:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	Petroleum Engineering Expert	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006137	08/04/2010 15:29	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>	RE: Petroleum Engineering Expert	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006138	08/04/2010 16:11	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Roth, David <dthroth@coxsmith.com>	RE: Petroleum Engineering Expert	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006139	08/04/2010 17:00	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Petroleum Engineering Expert	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006140	08/05/2010 9:22	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaimer.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	Rule 11 re: seismic permit	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product Confidential/Settlement Agreements
JPM-PRIV 006142	08/25/2010 18:26	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Attorney Client Privileged Communication - STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006143	08/25/2010 18:26	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Attorney Client Privileged Communication - STS	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006145	09/01/2010 15:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006146	09/01/2010 15:27	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006155	09/20/2010 20:39	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaimer.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS/PXD Seismic Rule 11	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements
JPM-PRIV 006156	09/20/2010 20:39	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaimer.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS/PXD Seismic Rule 11	Email with attachment	Pioneer/EOG litigation	Confidential/Settlement Agreements

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006157	09/20/2010 20:39	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Jaime Rangel <jaime.rangel@rangellaw.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS/PXD Seismic Rule 11	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 006174	10/12/2010 18:51	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Roth, David <dthroth@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Report	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006175	10/15/2010 8:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006176	10/15/2010 8:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006177	10/15/2010 8:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006178	10/15/2010 9:04	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006179	10/15/2010 9:04	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006180	10/15/2010 9:04	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006181	10/15/2010 10:48	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006182	10/15/2010 10:48	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006183	10/15/2010 10:48	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS depositions	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006184	10/19/2010 12:56	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006185	10/20/2010 10:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Atnipp deposition postponed	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006186	10/21/2010 10:04	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	Fw: Atnipp deposition postponed	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006187	10/21/2010 13:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006188	10/21/2010 13:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	FW: STS/Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006189	10/21/2010 13:55	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>	RE: STS/Pioneer	Email only	Pioneer/EOG litigation Trust Valuation	Attorney Client/ Work Product
JPM-PRIV 006190	10/21/2010 16:31	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006191	10/22/2010 14:53	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Leach deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006192	10/22/2010 14:53	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Leach deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006193	10/22/2010 14:53	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Leach deposition	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006199	11/02/2010 17:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006200	11/02/2010 17:42	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	STS/Pioneer Natural Resources: Depo Notice of Atripp for November 9, 2010.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006201	11/05/2010 17:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	STS/Pioneer Natural Resources: Depo Notice of Atripp for November 9, 2010.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006202	11/05/2010 17:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	STS/Pioneer Natural Resources: Depo Notice of Atripp for November 9, 2010.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006203	11/05/2010 17:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	STS/Pioneer Natural Resources: Depo Notice of Atripp for November 9, 2010.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006204	11/09/2010 17:08	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006205	11/10/2010 8:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS status	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006206	11/10/2010 8:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS status	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006207	11/10/2010 8:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS status	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006209	11/15/2010 11:22	Jenkins, Mirta <mjenkins@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006210	11/15/2010 11:22	Jenkins, Mirta <mjenkins@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	STS v. Pioneer	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006213	11/17/2010 9:33	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Re: Is there a pioneer deposition today?	Email only	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006214	11/17/2010 11:53	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006215	11/17/2010 11:53	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <wehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client
JPM-PRIV 006216	11/17/2010 15:02	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006217	11/17/2010 15:02	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <wehmeyer@coxsmith.com>	RE: South Texas Syndicate - Pioneer/EOG Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006218	11/18/2010 17:51	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Wehmeyer, Corey <wehmeyer@coxsmith.com>; Beck, Jason R <jason.r.beck@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com>	calendar	Email only	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006219	11/18/2010 20:17	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006220	11/18/2010 20:17	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client
JPM-PRIV 006221	11/18/2010 20:17	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006222	11/18/2010 22:22	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006223	11/18/2010 22:22	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006224	11/18/2010 22:22	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006225	11/19/2010 9:05	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006226	11/19/2010 9:05	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Colleen Dean <Colleen.Dean@jpmorgan.com>John C Minter <john.c.minter@jpmorgan.com>Kevin R Smith <kevin.r.smith@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006227	11/19/2010 9:16	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006228	11/19/2010 9:16	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006229	11/19/2010 9:16	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Re: South Texas Syndicate - Pioneer/EOG Litigation - Friday P/C at 3:00	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006230	11/19/2010 9:49	Koch, Donna <dkoch@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Jenkins, Mirta <mjenkins@coxsmith.com>Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation - Conference Call	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006231	11/19/2010 9:49	Koch, Donna <dkoch@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Jenkins, Mirta <mjenkins@coxsmith.com>Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation - Conference Call	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006232	11/19/2010 9:49	Koch, Donna <dkoch@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Jenkins, Mirta <mjenkins@coxsmith.com>Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	South Texas Syndicate - Pioneer/EOG Litigation - Conference Call	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006233	11/19/2010 10:27	Jenkins, Mirta <mjenkins@coxsmith.com>	RE: JPMorgan Chase Bank vs. Pioneer Natural Resources	RE: JPMorgan Chase Bank vs. Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006234	11/19/2010 10:27	Jenkins, Mirta <mjenkins@coxsmith.com>	RE: JPMorgan Chase Bank vs. Pioneer Natural Resources	RE: JPMorgan Chase Bank vs. Pioneer Natural Resources	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006235	12/01/2010 15:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006236	12/01/2010 15:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	STS - Order on Motion for Partial Summary Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006237	12/07/2010 9:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JP MORGAN CHASE BANK vs. PIONEER/GOLDSTEIN, LOUIS - Vol. I - E-Transcript File Delivery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006238	12/07/2010 9:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JP MORGAN CHASE BANK vs. PIONEER/GOLDSTEIN, LOUIS - Vol. I - E-Transcript File Delivery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006246	12/15/2010 17:59	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006247	12/15/2010 17:59	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006248	12/15/2010 21:15	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Fw: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006249	12/15/2010 21:15	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Fw: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006250	12/16/2010 14:35	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006251	12/16/2010 14:35	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006252	12/16/2010 14:48	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006253	12/16/2010 14:48	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>; Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006254	12/16/2010 14:48	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006257	12/21/2010 16:30	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006258	12/21/2010 16:30	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006259	12/21/2010 16:41	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006260	12/21/2010 16:41	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006261	12/21/2010 16:41	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer Natural Resources and EOG Resources Litigation - Mediation Dates Request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006262	12/23/2010 13:53	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Development Litigation against EOG and Pioneer - Mediation Date - Wednesday 19 January - Dallas	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006263	12/23/2010 13:53	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Development Litigation against EOG and Pioneer - Mediation Date - Wednesday 19 January - Dallas	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006264	01/03/2011 10:40	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	JPMORGAN CHASE BANK vs. PIONEER/ATNIPP, STUART GRADY - Vol. I - E-Transcript File Delivery	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006265	01/05/2011 10:01	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006266	01/05/2011 10:05	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product



**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006267	01/05/2011 10:05	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006268	01/05/2011 10:32	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006269	01/05/2011 10:32	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006270	01/05/2011 10:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006271	01/05/2011 10:49	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006272	01/05/2011 10:52	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006273	01/05/2011 10:56	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006274	01/05/2011 10:56	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006275	01/05/2011 10:59	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006276	01/05/2011 10:59	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006277	01/05/2011 11:05	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006278	01/05/2011 11:05	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006279	01/05/2011 11:20	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006280	01/05/2011 11:20	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006281	01/06/2011 10:05	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006282	01/06/2011 10:05	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Pioneer/STS - Call to Discuss Mediation Strategy	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006283	01/07/2011 10:02	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Call-in information for January 11, 2011 @ 11:00 a.m. conference call	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006285	01/11/2011 14:22	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006286	01/11/2011 14:22	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>		Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006287	01/12/2011 9:38	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006288	01/12/2011 9:45	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006289	01/12/2011 10:15	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Confidential Mediation Memorandum.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006290	01/12/2011 10:48	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006291	01/12/2011 10:51	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - mediation logistics and contact information	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006292	01/12/2011 10:53	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006293	01/12/2011 12:54	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006294	01/12/2011 16:44	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006296	01/12/2011 18:48	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Chelsea McGovern <chelsea@tjmcgovern.com>	RE:	Email with attachment	Pioneer/EOG settlement	Work Product
JPM-PRIV 006299	01/13/2011 16:44	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.i.tompkins@jpmchase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006300	01/13/2011 16:44	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010 - settlement letter	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006305	01/17/2011 20:52	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	Re: Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006306	01/17/2011 20:52	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Roth, David <dthroth@coxsmith.com>	Re: Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG settlement	Attorney Client
JPM-PRIV 006307	01/18/2011 9:55	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006308	01/18/2011 9:55	Roth, David <dthroth@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: Pioneer/STS - JPMorgan - April 20, 2010	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006309	01/18/2011 11:58	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Murtha Report	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006311	01/20/2011 11:38	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006312	01/20/2011 11:43	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006313	01/20/2011 11:58	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006314	01/20/2011 12:29	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006315	01/20/2011 12:41	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006316	01/20/2011 12:47	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com>	Re: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006317	01/21/2011 15:44	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006318	01/21/2011 17:33	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006319	01/21/2011 17:45	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Privileged - STS settlement proposal	Email only	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006320	01/24/2011 10:52	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006321	01/24/2011 10:52	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006322	01/24/2011 10:55	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006323	01/24/2011 10:55	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006324	01/24/2011 10:56	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006325	01/24/2011 10:56	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006326	01/24/2011 11:01	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006327	01/24/2011 11:01	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006328	01/24/2011 11:04	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006329	01/24/2011 11:04	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006330	01/24/2011 11:04	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006331	01/24/2011 11:04	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006332	01/24/2011 11:08	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006333	01/24/2011 11:08	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006334	01/24/2011 11:27	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006335	01/24/2011 11:27	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006336	01/24/2011 11:57	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006337	01/24/2011 11:57	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006338	01/24/2011 11:59	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006339	01/24/2011 11:59	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006340	01/24/2011 12:27	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006341	01/24/2011 12:27	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006342	01/24/2011 12:33	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006343	01/24/2011 12:33	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006344	01/24/2011 12:35	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006345	01/24/2011 12:35	bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.l.tompkins@jpmchase.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006346	01/24/2011 13:37	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006347	01/24/2011 13:37	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Pioneer Litigation - Conference Call request	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006348	01/24/2011 18:11	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.l.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006349	01/24/2011 18:11	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006350	01/24/2011 18:21	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006351	01/24/2011 18:21	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Roth, David <dthroth@coxsmith.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006352	01/24/2011 19:55	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006353	01/24/2011 19:55	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006354	01/24/2011 20:20	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006355	01/24/2011 20:27	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006356	01/24/2011 21:01	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Susan Kravik <susan.kravik@corpexchange.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006357	01/24/2011 21:01	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: Status - Pioneer EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006358	01/24/2011 21:34	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Susan Kravik <SUSAN.KRAVIK@chase.com> Roth, David <dthroth@coxsmith.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: final settlement FW: South Texas Syndicate Trust v. Pioneer and EOG	Email only	Pioneer/EOG settlement	Confidential/Settlement Agreements



**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006359	01/28/2011 15:48	Roth, David <dhroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPM/Pioneer-EOG settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006360	01/28/2011 15:48	Roth, David <dhroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: JPM/Pioneer-EOG settlement	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 006361	01/31/2011 16:52	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: JPM v Pioneer/EOG Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006362	02/02/2011 12:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006363	02/02/2011 12:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006364	02/02/2011 12:21	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006365	02/02/2011 12:31	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006366	02/02/2011 12:31	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com> Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006367	02/02/2011 13:26	Tompkins, H L <h.i.tompkins@jpmchase.com> <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006368	02/02/2011 13:26	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006369	02/02/2011 13:32	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006370	02/02/2011 13:32	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006371	02/02/2011 13:38	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006372	02/02/2011 13:38	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006373	02/02/2011 13:44	Susan Kravik <susan.kravik@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006374	02/02/2011 13:44	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006375	02/02/2011 13:52	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006376	02/02/2011 13:52	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmchase.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006377	02/02/2011 13:55	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	1 -<1@restricted.chase.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	FW: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006378	02/02/2011 13:55	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	1 -<1@restricted.chase.com>Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	FW: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006379	02/02/2011 13:56	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006380	02/02/2011 13:56	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006381	02/02/2011 14:06	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	FW: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006382	02/02/2011 14:06	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com>	FW: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006383	02/02/2011 15:40	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Tompkins, H <h.l.tompkins@jpmchase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006384	02/02/2011 15:48	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006385	02/02/2011 15:48	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE: STS/Pioneer - Settlement Documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006386	02/08/2011 17:39	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: EF definition	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Confidential/Settlement Agreements
JPM-PRIV 006387	02/08/2011 18:02	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.l.tompkins@jpmchase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EF definition	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Confidential/Settlement Agreements

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006388	02/08/2011 18:25	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Re: EF definition	Email with attachment	Pioneer/EOG litigation Lease Administration	Attorney Client/ Work Product
JPM-PRIV 006389	02/08/2011 18:25	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: EF definition	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 006390	02/09/2011 13:57	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: EF definition	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Confidential/Settlement Agreements
JPM-PRIV 006391	02/10/2011 14:43	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	FW: STS case	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006392	02/11/2011 13:06	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: STS case	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006393	02/11/2011 13:06	Tompkins, H L (h.l.tompkins@jpmchase.com) <h.l.tompkins@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com>Truss, Marty <jmtruss@coxsmith.com>	RE: STS case	Email with attachment	Pioneer/EOG settlement	Confidential/Settlement Agreements
JPM-PRIV 006394	02/14/2011 17:27	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006395	02/14/2011 17:29	Charlotte K Ray (Charlotte K Ray) <charlotte.k.ray@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Roth, David <dthroth@coxsmith.com>Susan Kravik <SUSAN.KRAVIK@chase.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006396	02/14/2011 17:29	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Roth, David <dthroth@coxsmith.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006399	02/14/2011 19:57	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com>Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>Roth, David <dthroth@coxsmith.com>Tompkins, H <h.l.tompkins@jpmchase.com>bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006400	02/15/2011 9:27	Roth, David <dthroth@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>	RE: EOG Resources and Pioneer Natural Resources - Quick Call at Ten on Tuesday?	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006401	02/21/2011 9:20	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006402	02/22/2011 11:01	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006403	02/22/2011 11:01	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006404	02/22/2011 15:28	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Bertram Hayes-Davis <bertram.hayes-davis@corpexchange.com>	Re: Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006405	02/22/2011 15:28	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Re: Pioneer/STS - Current Settlement Drafts	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006406	02/24/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006407	02/24/2011 10:39	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006408	02/24/2011 10:39	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006409	02/24/2011 12:52	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006410	02/24/2011 13:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: Pioneer/STS - Settlement Agreement Revised 2/23/11.DOC; Pioneer/STS - Ratification Revised 2/23/11.DOC	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006411	02/28/2011 8:59	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006412	02/28/2011 9:19	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006413	02/28/2011 9:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006414	02/28/2011 15:57	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: STS vs Pioneer & EOG	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006415	03/08/2011 11:25	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006416	03/08/2011 11:29	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	FW: Pioneer/STS - Tracked Changes versions of documents	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006417	03/08/2011 18:03	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dhroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	RE: FINAL Settlement Documents - For JPMorgan Execution	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product

**EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG**

<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006418	03/10/2011 12:05	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthoth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	STS settlement - Executed Copy from Pioneer	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006419	03/11/2011 10:34	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006420	03/11/2011 11:19	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006421	03/11/2011 11:24	Bertram Hayes-Davis <bertram.hayes- davis@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Wehmeyer, Corey <cwehmeyer@coxsmith.com>; Truss, Marty <jmtruss@coxsmith.com>	RE: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006422	03/11/2011 11:39	Smith, Kevin R (kevin.r.smith@jpmorgan.com) <kevin.r.smith@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006423	03/11/2011 11:39	Kevin R Smith <kevin.r.smith@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: STS v Pioneer: EOG's Signature Page to Settlement	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006424	03/11/2011 12:30	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	STS v Pioneer: Complete, Executed Version of Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006425	03/11/2011 18:18	Kevin R Smith <kevin.r.smith@jpmorgan.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	Placeholder Language for Settlement Item in STS Distribution memo	Email only	Pioneer/EOG settlement Trust Administration	Attorney Client
JPM-PRIV 006426	03/14/2011 10:10	Susan Kravik <susan.kravik@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Herb J Sliger <herb.j.sliger@jpmchase.com> John C Minter <john.c.minter@jpmorgan.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Sherry Harrison <SHERRY.HARRISON@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	RE: March STS Memo	Email with attachment	Pioneer/EOG settlement Beneficiary communications	Attorney Client/ Work Product
JPM-PRIV 006427	03/14/2011 10:47	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	FW: STS/Pioneer: Memo of Settlement Terms for Beneficiaries.DOC	Email with attachment	Pioneer/EOG settlement Beneficiary communications	Attorney Client/ Work Product
JPM-PRIV 006428	03/14/2011 10:47	Susan Kravik <SUSAN.KRAVIK@chase.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>	FW: STS/Pioneer: Memo of Settlement Terms for Beneficiaries.DOC	Email with attachment	Pioneer/EOG settlement Trust Administration	Attorney Client

EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006429	03/14/2011 11:47	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: March STS Memo	Email with attachment	Pioneer/EOG settlement Trust Administration	Attorney Client
JPM-PRIV 006431	03/14/2011 12:39	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: March STS Memo	Email with attachment	Pioneer/EOG settlement Trust Administration	Attorney Client
JPM-PRIV 006433	03/14/2011 12:55	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE: March STS Memo	Email with attachment	Pioneer/EOG settlement Trust Administration	Attorney Client
JPM-PRIV 006435	03/14/2011 14:14	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Truss, Marty <jmtruss@coxsmith.com>	STS v. Pioneer - Motion to Enter Final Judgment	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006437	03/14/2011 15:51	Aurora Castillo <Aurora.Castillo@jpmorgan.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	FW: TRK #790366902810	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006438	03/14/2011 16:05	Susan Kravik <susan.kravik@corpexchange.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE:	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006439	03/14/2011 16:05	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	RE:	Email with attachment	Pioneer/EOG litigation	Attorney Client
JPM-PRIV 006440	03/14/2011 16:07	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com>	RE:	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006443	03/14/2011 17:03	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com>	Fw: Settlement Statement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006444	03/14/2011 17:07	Tompkins, H L (h.i.tompkins@jpmchase.com) <h.i.tompkins@corpexchange.com>	Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	FW: Settlement Statement	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006445	03/15/2011 14:48	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Truss, Marty <jmtruss@coxsmith.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Pioneer/STS - Original Signatures to Settlement	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006450	03/16/2011 12:15	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Beck, Jason R <jason.r.beck@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Sherry Harrison <SHERRY.HARRISON@jpmorgan.com>	RE: Pioneer case	Email with attachment	Pioneer/EOG litigation	Attorney Client/ Work Product
JPM-PRIV 006451	03/24/2011 15:47	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes- davis@jpmorgan.com>; Roth, David <dthroth@coxsmith.com> Truss, Marty <jmtruss@coxsmith.com>	Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product
JPM-PRIV 006452	03/24/2011 15:51	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes- davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement	Attorney Client/ Work Product



<b>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</b>						
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>  <u>Privilege</u>
JPM-PRIV 006453	03/24/2011 15:51	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006454	03/29/2011 10:09	Susan Kravik <susan.kravik@corpexchange.com>	Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Pioneer/STS/EOG - Final Judgment - Entered	Email with attachment	Pioneer/EOG settlement Attorney Client/ Work Product
JPM-PRIV 006455	03/29/2011 17:51	Wehmeyer, Corey <cwehmeyer@coxsmith.com>	Tompkins, H <h.i.tompkins@jpmchase.com> Truss, Marty <jmtruss@coxsmith.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Wire transfer	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006456	04/12/2011 10:36	Susan Kravik <SUSAN.KRAVIK@chase.com>	Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: STS - Pioneer/EOG	Email only	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006457	04/12/2011 10:38	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	Insert to memorandum to respond to Masucci email	Email with attachment	Pioneer/EOG litigation Beneficiary Communications Attorney Client
JPM-PRIV 006458	04/12/2011 12:26	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Susan Kravik <SUSAN.KRAVIK@chase.com> Tompkins, H <h.i.tompkins@jpmchase.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: Insert to memorandum to respond to Masucci email	Email with attachment	Pioneer/EOG litigation Beneficiary Communications Attorney Client
JPM-PRIV 006462	05/05/2011 18:59	Herb J Silger <herb.j.silger@corpexchange.com>	Aaron J Reber <aaron.j.reber@jpmorgan.com> Beck, Jason R <jason.r.beck@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Colleen Dean <Colleen.Dean@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> Gary P. Aymes <Gary.P.Aymes@jpmorgan.com> John J Powers <john.j.powers@jpmchase.com> Kevin R Smith <kevin.r.smith@jpmorgan.com> Paula Baker <paula.baker@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Terry, Douglas A <douglas.a.terry@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	South Texas Syndicate - Cox Smith Memoranda	Email with attachment	Pioneer/EOG litigation Attorney Client/ Work Product
JPM-PRIV 006466	05/27/2011 10:15	Gary P. Aymes <gary.p.aymes@corpexchange.com>	Kevin R Smith <kevin.r.smith@jpmorgan.com>; Aaron J Reber <aaron.j.reber@jpmorgan.com> Beck, Jason R <jason.r.beck@jpmorgan.com> Charlotte K Ray <charlotte.k.ray@jpmorgan.com> Debra M Round <debra.m.round@jpmorgan.com> John C Minter <john.c.minter@jpmorgan.com> Susan Kravik <SUSAN.KRAVIK@chase.com> Terry, Douglas A <douglas.a.terry@jpmorgan.com> Tompkins, H <h.i.tompkins@jpmchase.com> bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: South Texas Syndicate - Drafts	Email with attachment	Pioneer/EOG settlement Pioneer/EOG litigation Attorney Client

<u>EXCERPT FROM DEFENDANTS' THIRD SUPPLEMENTAL PRIVILEGE LOG</u>							
<u>Bates No.</u>	<u>Date</u>	<u>From</u>	<u>To, Cc, Bcc</u>	<u>Subject</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Privilege</u>
JPM-PRIV 006467	05/27/2011 12:56	Susan Kravik <susan.kravik@corpexchange.com>	Gary P. Aymes <Gary.P.Aymes@jpmorgan.com>; Kevin R Smith <kevin.r.smith@jpmorgan.com>; Aaron J Reber <aaron.j.reber@jpmorgan.com>; Jason R <jason.r.beck@jpmorgan.com>; Charlotte K Ray <charlotte.k.ray@jpmorgan.com>; Debra M Round <debra.m.round@jpmorgan.com>; John C Minter <john.c.minter@jpmorgan.com>; Terry, Douglas A <douglas.a.terry@jpmorgan.com>; Tompkins, H <h.i.tompkins@jpmchase.com>; bertram.hayes-davis@jpmorgan.com <bertram.hayes-davis@jpmorgan.com>	RE: South Texas Syndicate - Drafts	Email with attachment	Pioneer/EOG litigation	Attorney Client

(Consolidated Under)  
**CAUSE NO. 2010-CI-10977**

<b>JOHN K. MEYER, ET AL.</b>	§	<b>IN THE DISTRICT COURT</b>
<b>Plaintiffs,</b>	§	
	§	
<b>vs.</b>	§	
	§	
<b>JP MORGAN CHASE BANK, N.A.</b>	§	<b>225<sup>TH</sup> JUDICIAL DISTRICT</b>
<b>INDIVIDUALLY/CORPORATELY</b>	§	
<b>AND AS TRUSTEE OF THE SOUTH</b>	§	
<b>TEXAS SYNDICATE TRUST</b>	§	
<b>and GARY P. AYMES,</b>	§	
<b>Defendants.</b>	§	<b>BEXAR COUNTY, TEXAS</b>

**PLAINTIFFS' MOTION TO COMPEL**  
(Seventh Requests for Production)

TO THE HONORABLE JUDGE OF SAID COURT:

Now come Plaintiffs, John K. Meyer, et al., in the above-styled and numbered cause, and file this Motion to Compel Defendant JP Morgan Chase Bank, N.A. ("JPM") to answer Plaintiffs' Seventh Requests for Production and would respectfully show the Court the following:

**Introduction**

1. JPM was the trustee of a trust known as the South Texas Syndicate ("STS") until it was forced to resign by court order dated July 19, 2013. A successor trustee is in the process of being selected.

2. Plaintiffs are beneficiaries of the trust and have alleged that JPM breached its fiduciary duties by failing to provide information regarding the trust and failing to properly manage the trust. Plaintiffs have sought to obtain information

regarding the trust through discovery, but JPM has refused to provide such information as follows:

**Plaintiffs' Seventh Request for Production**  
**Nos. 1, 2, 4, 6, 8, 9, 10 and 11**

3. On or about December 11, 2013, Plaintiffs' served JP Morgan with their Seventh Request for Production. On or about January 13, 2014, JP Morgan served its responses (**Exhibit 1**). JP Morgan has raised a number of unfounded objections including that the information sought is confidential, private, and proprietary with regard to Request for Production Nos. 1, 2, 4, 6, 8, 9, 10 and 11. Plaintiffs asked JPM's counsel to produce these documents, but no such documents have been produced to date.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that this Court set this matter for hearing and that upon hearing hereof, enter an order removing JP Morgan's objections and requiring Defendant to provide answers to Plaintiffs' Seventh Request for Production, and ordering the requested documents be produced, and granting any other additional relief to which Plaintiffs may be justly entitled.

Respectfully submitted,

John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile

**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile

**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732



**FIAT**

Plaintiffs' Motion to Compel is hereby set for hearing on January 29, 2014 at 8:30 a.m. in the Presiding Judicial District Court, Room 109, Bexar County, San Antonio, Texas. **1/23/2014**

SIGNED this \_\_\_\_ day of January, 2014.

**Laura Salinas**  
**Presiding Judge**  
**166th District Court**  
**JUDGE PRESIDING**  
**Bexar County, Texas**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been sent  
by:

\_\_\_\_ U.S. Certified Mail, Return Receipt Requested to:  
  √    Facsimile to:  
\_\_\_\_ First Class Mail to:  
\_\_\_\_ Hand Delivery to:

Mr. Patrick K. Sheehan  
Mr. Rudy Garza  
Mr. David Jed Williams  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Mr. John C. Eichman  
Ms. Amy S. Bowen  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202

Mr. Fred W. Stumpf  
Boyer Short, A Professional Corporation  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046

on this the 23<sup>rd</sup> day of January, 2014.

*/s/*  
\_\_\_\_\_  
James L. Drought



CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.,  
Plaintiffs,

V.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES,  
Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**DEFENDANT'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' SEVENTH  
REQUEST FOR PRODUCTION**

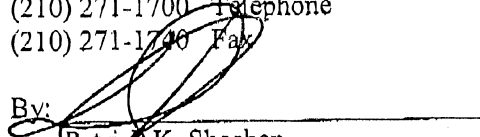
Defendant JPMorgan Chase Bank, N.A., Individually/Corporately, and as Trustee of the South Texas Syndicate Trust ("J.P. Morgan") submits these Objections and Responses to Plaintiffs' Seventh Request for Production.

Respectfully submitted,

**HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED**

7373 Broadway, Suite 300  
San Antonio, Texas 78209  
(210) 271-1700 Telephone  
(210) 271-1706 Fax

By:

  
Patrick K. Sheehan  
State Bar No. 18175500  
Kevin M. Beiter  
State Bar No. 02059065  
Rudy A. Garza  
State Bar No. 07738200  
David Jed Williams  
State Bar No. 21518060

**HUNTON & WILLIAMS LLP**

1445 Ross Avenue, Suite 3700

Dallas, Texas 75202

(214) 979-3000 - Telephone

(214) 880-0011 - Facsimile

Charles A. Gall

State Bar No. 07281500

John C. Eichman

State Bar No. 06494800

Amy S. Bowen

State Bar No. 24028216

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document was served upon the following on January 13, 2014 by the method indicated:

Mr. James L. Drought  
DROUGHT DROUGHT & BOBBITT, LLP  
112 East Pecan, Suite 2900  
San Antonio, Texas 78205

**VIA FACSIMILE**

Mr. George Spencer, Jr.  
CLEMENS & SPENCER  
112 East Pecan, Suite 1300  
San Antonio, Texas 78205

**VIA FACSIMILE**

Mr. Richard Tinsman  
Ms. Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78205

**VIA FACSIMILE**

Mr. John B. Massopust  
Mr. Matthew J. Gollinger  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152

**VIA FACSIMILE**

Mr. Steven J. Badger  
Ms. Ashley Bennett Jones  
ZELLE HOFMANN VOELBEL & MASON LLP  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975

**VIA FACSIMILE**

Mr. David R. Deary  
Mr. Jim L. Flegle  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251

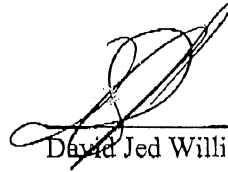
**VIA FACSIMILE**

Mr. Michael S. Christian  
ZELLE HOFMANN VOELBEL & MASON  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104

**VIA FACSIMILE**

Mr. Fred W. Stumpf  
Mr. Kelly M. Walne  
Boyer Short  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77045

VIA FACSIMILE



---

David Jed Williams

**DEFENDANT'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' SEVENTH  
REQUEST FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Produce the underlying database, methodology, and all input variables used by Ryder Scott Company in the appraisal of the STS Trust minerals dated April 11, 2011. We understand that Ryder Scott utilized ARIES Economic System in their April 11, 2011 valuation.

**OBJECTIONS:**

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant will produce information responsive to this Request.

**REQUEST FOR PRODUCTION NO. 2:** Produce the underlying database, methodology and all input variables used by Ryder Scott Company in the appraisal of the STS Trust minerals dated January 1, 2013. We understand that Ryder Scott utilized *PHDWin* Economic System in their January 1, 2013 valuation.

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant will produce information responsive to this Request.

**REQUEST FOR PRODUCTION NO. 3:** Produce all documents provided to Lazard Freres Co, LLC from Ryder Scott Company used in connection with preparation of Lazard's report for the South Texas Syndicate mineral assets, including but not limited to drilling schedules, GIS maps, and any other maps, and all shape files related to such maps.

**RESPONSE:**

Documents requested are not in the possession, custody or control of Defendant.

**REQUEST FOR PRODUCTION NO. 4:** Produce all engagement letters between JP Morgan and Ryder Scott Company, LP in relation to the South Texas Syndicate Trust.

**OBJECTIONS:**

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant will produce documents responsive to this Request, if any.

**REQUEST FOR PRODUCTION NO. 5:** Produce all engagement letters between Jackson Walker and Ryder Scott Company, LP in relation to the South Texas Syndicate Trust.

**RESPONSE:**

There are no documents responsive to this request.

**REQUEST FOR PRODUCTION NO. 6:** Produce all instructions from JP Morgan to Ryder Scott Company relating to evaluations or analysis of the South Texas Syndicate mineral assets.

**OBJECTIONS:**

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant will produce documents responsive to this Request, if any.

**REQUEST FOR PRODUCTION NO. 7:** Produce all instructions from Jackson Walker to Ryder Scott Company relating to evaluations or analysis of the South Texas Syndicate mineral assets.

**RESPONSE:**

There are no documents responsive to this request.

**REQUEST FOR PRODUCTION NO. 8:** Produce all documents pertaining to any development plans or proposed development plans provided to JP Morgan by any lessee of oil, gas or minerals owned by the South Texas Syndicate.

**OBJECTIONS:**

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant has produced and/or will produce documents responsive to this Request, if any.

**REQUEST FOR PRODUCTION NO. 9:** Produce all documents pertaining to any development plans or proposed development plans provided to Jackson Walker by any lessee of oil, gas or minerals owned by the South Texas Syndicate.

**OBJECTIONS:**

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant has produced and/or will produce documents responsive to this Request, if any.

**REQUEST FOR PRODUCTION NO. 10:** Produce all documents supporting the decision to add contingent reserves or modify recoverable categories in the Ryder Scott Company appraisal of the South Texas Syndicate mineral assets dated January 1, 2013.

**OBJECTIONS:**

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant has produced and/or will produce documents responsive to this Request, if any.

**REQUEST FOR PRODUCTION NO. 11:** Produce all communications exchanged between any lessee and Ryder Scott Company, or provided to JP Morgan by any lessee which was intended for Ryder Scott Company, in relation to preparation of the Ryder Scott appraisals dated April 1, 2011 and January 1, 2013.

---

**OBJECTIONS:**

Defendant objects to this Request on the following bases:

1. This Request seeks confidential, private, and/or proprietary information pertaining to Defendant and/or the STS Trust.

**RESPONSE:**

Subject to and without waiving this objection, Defendant will produce documents provided to JP Morgan responsive to this Request, if any. Communications between any lessee and Ryder Scott Company are not in the possession, custody or control of Defendant.



**CAUSE NO. 2010-CI-10977**

JOHN K. MEYER, <i>ET AL.</i> ,	§	IN THE DISTRICT COURT
	§	
<i>Plaintiffs,</i>	§	
	§	
JP MORGAN CHASE BANK, N.A.,	§	
INDIVIDUALLY/CORPORATELY AND	§	225 <sup>th</sup> JUDICIAL DISTRICT
AS TRUSTEE OF THE SOUTH TEXAS	§	
SYNDICATE TRUST AND GARY P.	§	
AYMES,	§	
	§	
<i>Defendants.</i>	§	BEXAR COUNTY, TEXAS

**PLAINTIFFS' FIFTH AMENDED PETITION**

Plaintiffs complain of JP Morgan Chase Bank, N.A., Individually/Corporately and as Trustee of the SOUTH TEXAS SYNDICATE TRUST and GARY P. AYMES (collectively “Defendants”), and for causes of action would show the following:

**I.**

**INTRODUCTION**

1. The subject matter of this Action involves the administration of the South Texas Syndicate Trust (“STS Trust”). The Plaintiff beneficiaries allege that Defendants have engaged in a pattern of neglect, mismanagement and tortious behavior that has caused millions of dollars of damage to the STS Trust assets and estate.

2. Plaintiffs bring this suit for damages caused by JP Morgan’s actions. Plaintiffs further seek a statutory accounting, the removal of Defendants as Trustee and judicial reformation of the STS Trust instrument to protect the beneficiaries’ interests in the future, provide transparency, define the duties and responsibilities of the trustee, and ensure the efficient and proper administration of the STS Trust.

## **II.**

### **DISCOVERY CONTROL LEVEL**

3. This action is being conducted in accordance with a docket control order pursuant to discovery control Level 3, as provided by TEX. R. CIV. P. 190.4.

## **III.**

### **JURISDICTION AND VENUE**

4. The STS Trust was created under the Texas Trust Act of 1943. The current Texas Trust Code applies to the STS Trust through the Texas Trust Code Applicability section which limits the Trust Code's application to certain enumerated "transactions" after the effective date of the Texas Trust Code (January 1, 1984). Tex. Prop. Code §§ 111.006 and 111.004(16); Tex. Civ. St. Art. 7425b-1 *et seq.*, Texas Trust Act. This Court has jurisdiction over this matter pursuant to Texas Property Code § 115.001, Tex. Prop. Code §§ 111.006, and Tex. Civ. St. Art. 7425b-24.

5. Jurisdiction is proper because the damages sought are within the jurisdictional limits of this Court.

6. Pursuant to Texas Property Code § 115.002, venue is proper in Bexar County, Texas, as the situs of the administration of the STS Trust is in this county. Venue is also proper in Bexar County, Texas, under Tex. Civ. Prac. & Rem. Code § 15.002. Specifically, a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in Bexar County, Texas.

7. Defendants have submitted to the jurisdiction of this Court as Gary P. Aymes is a resident of Texas and JP Morgan Chase Bank, N.A. is duly authorized to and does conduct business in the State of Texas.

#### IV.

##### **PARTIES AND AUTHORITY TO BRING ACTION**

8. Plaintiff Linda Aldrich is a resident of California. Plaintiff Aldrich is a beneficiary holding a Certificate of Beneficial Interest in the South Texas Syndicate Trust. Plaintiff Aldrich is also a beneficiary of the Harry C. Piper Sr. Trust FBO Linda Aldrich which holds a Certificate of Beneficial Interest in the STS Trust.

9. Defendant Gary P. Aymes (“Aymes”) is an individual and resides in Bexar County, Texas. Aymes has appeared in this cause. At all material times, he has been and is a Fiduciary Officer of JP Morgan assigned to the STS Trust.

10. Plaintiffs Edward P. and Karla Barrington are residents of Spokane, WA. The Barringtons are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

11. Plaintiff Judy A. Barrington is a resident of Spokane, WA. Ms. Barrington is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

12. Plaintiff, Maryann Barrington, is a resident of Spokane, WA. Ms. Barrington is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

13. Plaintiffs Patrick R. and Delores Bartleson are residents of Spokane, WA. Bartlesons are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

14. Plaintiff Sarah Bell is a resident of Minnesota. Plaintiff Bell is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

15. Plaintiff Emilie Blaze is a resident of Ruxton, Maryland. Emilie Blaze is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

16. Plaintiffs Sharon T. and Joe Blazek are residents of Nine Mile Falls, WA. The Blazeks are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

17. Plaintiff Noah Bly is a resident of Edina, MN. Mr. Bly is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

18. Plaintiff Anne Bouliane is a resident of San Francisco, CA. Ms. Bouliane is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

19. Plaintiff Douglas Burdette is a resident of Burbank, CA. Mr. Burdette is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

20. Plaintiff Wayne Burdette is a resident of Meadow Vista, CA. Mr. Burdette is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

21. Plaintiff Kathryn M. Canwell is a resident of Washington. Plaintiff Canwell is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

22. Plaintiff Bonnie Card is a resident of Monrovia, CA. Ms. Card is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

23. Plaintiff John Carney is a resident of Minnesota. Plaintiff John Carney is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

24. Plaintiff Josephine Carney is a resident of North Carolina. Plaintiff Josephine Carney is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

25. Plaintiff Barbara Carson is a resident of Washington. Plaintiff Carson is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

26. Plaintiff Alice P. Cestari is a resident of Massachusetts. Plaintiff Cestari is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff Cestari is also a beneficiary of the George F. Piper Trust FBO Alice P. Cestari, which holds a Certificate of Beneficial Interest in the STS Trust.

27. Plaintiff Barbara Warner Collins is a resident of Colorado. Plaintiff Collins is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

28. Plaintiff Margaret Cost is a resident of Minnesota. Plaintiff Cost is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff Cost is also a beneficiary of the H.C. Piper Trust U/A Margaret P. Cost, a beneficiary of the Louise G. Piper 1964 Trust FBO Margaret P. Cost, and a beneficiary of the Harry C. Piper 1962 Trust FBO Margaret P. Cost, all of which hold Certificates of Beneficial Interest in the STS Trust.

29. Plaintiff Catherine M. Cowles is a resident of Duluth, MN. Ms. Cowles is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

30. Plaintiffs Sally and Daniel E. Crowley, IV are residents of Spokane, WA. The Crowleys are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

31. Plaintiff Sheila Ann Curlee is a resident of Houston, TX. Ms. Curlee is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

32. Plaintiff Harriett O. Curry is a resident of Oregon. Plaintiff Curry is a beneficiary and trustee of the Harriett O. Curry Revocable Trust U/A February 24, 2000 (aka, "RBC Wealth Management Ref: 309-46212") which holds a Certificate of Beneficial Interest in the STS Trust.

33. Plaintiff AnnaJo Doerr is a resident of Wisconsin. Plaintiff AnnaJo Doerr is the manager and beneficiary of the AnnaJo Doerr Managing Agency which holds a Certificate of Beneficial Interest in the STS Trust.

34. Plaintiff Edward Doerr is a resident of Alaska. Plaintiff Edward Doerr is the manager and beneficiary of the Edward Doerr Managing Agency which holds a Certificate of Beneficial Interest in the STS Trust.

35. Plaintiff Henry Doerr IV is a resident of New Zealand. Plaintiff Henry Doerr IV is a beneficiary of the Henry Doerr IV Trust which holds a Certificate of Beneficial Interest in the STS Trust.

36. Plaintiff Katherine D. Doerr is a resident of Minnesota. Plaintiff Katherine Doerr is a beneficiary of the Katherine D. Doerr Revocable Trust which holds a Certificate of Beneficial Interest in the STS Trust.

37. Plaintiff Mary C. Doerr is a resident of Minnesota. Plaintiff Mary Doerr is the manager and beneficiary of the Mary C. Doerr Managing Agency which holds a Certificate of Beneficial Interest in the STS Trust

38. Plaintiff Robin P. Downs is a resident of Madison, Wisconsin. Ms. Downs is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

39. Plaintiff Cathy A. Duus is a resident of California. Plaintiff Duus is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff Duus is also a final beneficiary of the Robert Elbridge Norris Testamentary Trust (Union Bank), which holds a Certificate of Beneficial Interest in the STS Trust.

40. Plaintiff Mary McLean Evans is a resident of Clinton, New York. Ms. Evans is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

41. Plaintiff Fred Fair is a resident of Taos, NM. Mr. Fair is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

42. Plaintiffs Sandra and Douglas Faulkner are residents of Spokane, WA. The Faulkners are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

43. Plaintiffs Susan A. and Raymond L. Foster, Sr. are residents of Spokane, WA. The Fosters are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

44. Plaintiffs John D. & Kathleen French are residents of Virginia. Plaintiffs French are trustees and beneficiaries of the John D. French Living Trust dtd 3-26-97, which holds a Certificate of Beneficial Interest in the STS Trust.

45. Plaintiff Charles B. Gertmenian is a resident of Berlin, Germany. Mr. Gertmenian is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

46. Plaintiff Sarah Gertmenian is a resident of Laguna Beach, CA. Ms. Gertmenian is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

47. Plaintiff Thomas G. Gertmenian is a resident of Los Angeles, CA. Mr. Gertmenian is a beneficiary and trustee of the Thomas G. Gertmenian Trust holding a Certificate of Beneficial Interest in the STS Trust.

48. Plaintiff Linda Merrill Haas is a resident of Scotts Valley, CA. Ms. Haas is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

49. Plaintiff Andrew Hilgartner is a resident of Illinois. Plaintiff Hilgartner is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

50. Defendant JP Morgan Chase Bank, N.A. (“JP Morgan”) is a foreign financial institution licensed to do business in the State of Texas. JP Morgan has appeared in this cause. JP Morgan is the current Trustee of the Trust.

51. Plaintiff Elizabeth Jubert is a resident of Minnesota. Plaintiff Jubert is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

52. Plaintiff Monte J. Kestell, Jr. is a resident of Spokane, WA. Mr. Kestell is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

53. Plaintiff Robert J. Kestell is a resident of Auburn, WA. Mr. Kestell is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

54. Plaintiff Patricia Larrabure is a resident of Virginia. Plaintiff Larrabure is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

55. Plaintiffs Sheila M. and Kevin P. Magee are residents of Spokane, WA. The Magees are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

56. Plaintiff Catherine Hilgartner Masucci is a resident of New Jersey. Plaintiff Masucci is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

57. Plaintiff Deirdre A. McCarthy is a resident of Duluth, MN. Ms. McCarthy is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

58. Plaintiff, John McCarthy, is a resident of Sturgeon, WI. Mr. McCarthy is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

59. Plaintiff Patrick McCarthy is a resident of Duluth, MN. Mr. McCarthy is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

60. Plaintiff Timothy S. McCarthy is a resident of Oconomowoc, WI. Mr. McCarthy is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

61. Plaintiff Janet G. McFarlane is a resident of Denver, CO. Ms. McFarlane is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

62. Plaintiff Thomas P. and Laurie McGrath are residences of Poplar, WI. The McGraths are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

63. Plaintiff Jamie McGrath-Marx is a resident of Eureka, CA. Ms. McGrath-Marx is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

64. Plaintiff David W. McLean is a resident of Minnesota. Plaintiff David McLean is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.



65. Plaintiff Laura T. McLean is a resident of Duluth, MN. Ms. McLean is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

66. Plaintiff Lisa F. McLean is a resident of Minnesota. Plaintiff Lisa McLean is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

67. Plaintiff Nancy McLean is a resident of Minnesota. Plaintiff Nancy McLean is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

68. Plaintiffs Robert C. and Kathryn F. Mesaros are residents of Vermont. Plaintiffs Mesaros are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust.

69. Plaintiff John K. Meyer is a resident of Bexar County, Texas. John K. Meyer is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

70. Plaintiff John Meyer, Jr. is a resident of Bexar County, Texas. John Meyer, Jr. is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

71. Plaintiff Theodore Meyer is a resident of Bexar County, Texas. Theodore Meyer is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

72. Plaintiff, Mary C. Miller, is a resident of Minneapolis, MN. Ms. Miller is a beneficiary holding a Certificate of Beneficiary Interest in the STS Trust.

73. Plaintiff Julia P. Mombello is a resident of Westport, CT. Ms. Mombello is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

74. Plaintiff Jeannette M. Muirhead is a resident of California. Plaintiff Muirhead is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

75. Plaintiff Gwen S. Myers is a resident of Minnetonka, MN. Ms. Myers is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

76. Plaintiff Caroline P. Myhre is a resident of Montana. Plaintiff Myhre is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

77. Plaintiff Marcia Lee Nelson is a resident of California. Plaintiff Nelson is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

78. Plaintiffs, Shannon and James Nelson, are residents of Spokane, WA. The Nelsons are beneficiaries holding a Certificate of Beneficiary Interest in the STS Trust.

79. Plaintiff Roland C. Nickerson is a resident of Hailey, ID. Mr. Nickerson is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

80. Plaintiffs Roger B. and Sally Noyes are residents of Cottonwood, AZ. The Noyes are beneficiaries and trustees of the Roger B/Henrietta P Noyes Revocable Living Trust holding a Certificate of Beneficial Interest in the STS Trust.

81. Plaintiff Anne Pennock is a resident of Pennsylvania. Plaintiff Pennock is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

82. Plaintiff Charles F. Pierson, Jr. is a resident of Montana. Plaintiff Charles Pierson is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff Charles Pierson is also a beneficiary of the HC Piper Trust U/A Charles Pierson Jr., the Louise G. Piper Trust FBO for Charles F Pierson Jr., and the Harry C. Piper Trust FBO Charles F Pierson Jr., all of which hold Certificates of Beneficial Interest in the STS Trust.

83. Plaintiff David Pierson is a resident of Minnesota. Plaintiff David Pierson is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

84. Plaintiff James Pierson is a resident of Oregon. Plaintiff James Pierson is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

85. Plaintiff John Pierson is a resident of Denver, CO. Mr. Pierson is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

86. Plaintiff Addison Piper is a resident of Minnesota. Plaintiff Addison Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff Addison Piper is also the beneficiary of the H.C. Piper Trust FBO Addison L. Piper and the Louise G. Piper Trust FBO Addison L. Piper, both of which hold Certificates of Beneficial Interest in the STS Trust.

87. Plaintiff Andrew P. Piper is a resident of Oregon. Plaintiff Andrew Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

88. Plaintiff Ann Piper is a resident of California. Plaintiff Ann Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

89. Plaintiff George F. Piper is a resident of Minnesota. Plaintiff George Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

90. Plaintiff Harry C. Piper III is a resident of Oregon. Plaintiff Harry Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff Harry Piper is also the beneficiary of the H.C. Piper Trust FBO Harry C. Piper III and the Louise G. Piper Trust FBO Harry C. Piper III, both of which hold Certificates of Beneficial Interest in the STS Trust.

91. Plaintiff James T. Piper is a resident of California. Plaintiff James Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

92. Plaintiff John Carter Piper is a resident of California. Plaintiff Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff John Carter Piper is also a co-trustee of the MCP Trust which holds a Certificate of Beneficial Interest in the STS Trust.

93. Plaintiff John Q. Piper is a resident of Virginia. Plaintiff Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

94. Plaintiff Karen B. Piper is a resident of Roslindale, MA. Ms. Piper is a beneficiary and trustee of the Karen Odessa Piper 2012 Revocable Trust holding a Certificate of Beneficial Interest in the STS Trust.

95. Plaintiff Kathleen P. Piper is a resident of Barneveld, WI. Ms. Piper is a beneficiary and Robin Downs is the trustee of the Kathleen Page Piper Revocable Living Trust holding a Certificate of Beneficial Interest in the STS Trust.

96. Plaintiff Matthew B. Piper is a resident of California. Plaintiff Matthew Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

97. Plaintiff Timothy T. Piper is a resident of Newburyport, MA. Mr. Piper is a beneficiary and trustee (along with Carol A. Piper, trustee) of the Timothy T. Piper Living Trust holding a Certificate of Beneficial Interest in the STS Trust.

98. Plaintiff Vincent G. Pardo Piper is a resident of California. Plaintiff Vincent Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

99. Plaintiff William Piper is a resident of California. Plaintiff William Piper is the trustee of the William Piper Trust which holds a Certificate of Beneficial Interest in the STS Trust.

100. Plaintiff William G. Piper is a resident of California. Plaintiff William G. Piper is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

101. Plaintiff Elizabeth Piper-Forman is a resident of California. Plaintiff Piper-Forman is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust. Plaintiff

Piper-Forman is also a co-trustee of the MCP Trust which holds a Certificate of Beneficial Interest in the STS Trust.

102. Plaintiff Geraldine A. Rasmussen is a resident of Woodbury, MN. Ms. Rasmussen is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

103. Plaintiff Richard Richard, Sr. is a resident of Spokane, WA. Mr. Richard is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

104. Plaintiff Richard M. Rogers is a resident of Imperial Beach, CA. Mr. Rogers is a beneficiary and trustee of the Carl E. Rogers Trust holding a Certificate of Beneficial Interest in the STS Trust.

105. Plaintiff Donald B. Salisbury is a resident of Menomonie, WI. Mr. Salisbury is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

106. Plaintiff Mary M. Schwartz is a resident of Montana. Plaintiff Schwartz is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

107. Plaintiff Marjorie N. Skiff is a resident of South Burlington, VT. Ms. Skiff is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

108. Plaintiff Susan G. Snow Trust is a resident of Sebastopol, CA. Ms. Snow is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

109. Plaintiff Elizabeth Warner Verkade is a resident of California. Plaintiff Verkade is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

110. Plaintiff Julia Mary Walker is a resident of California. Plaintiff Walker is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

111. Plaintiff Barbara Warner is a resident of Minnesota. Plaintiff Barbara Warner is the trustee for the Thomas L. Warner Irrevocable Trust which holds a Certificate of Beneficial Interest in the STS Trust.

112. Plaintiff Bonnie Warner is a resident of Nevada. Plaintiff Bonnie Warner is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

113. Plaintiff Ellsworth A. Warner, Jr. is a resident of California. Plaintiff Ellsworth Warner is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

114. Plaintiffs H. T. & S. S. Warner are residents of Minnesota. Plaintiffs H.T. & S.S. The Warners are beneficiaries holding a Certificate of Beneficial Interest in the STS Trust. The Warners are also beneficiaries of the Sally S. Warner Trust U/A 2/12/1997 which holds a Certificate of Beneficial Interest in the STS Trust.

115. Plaintiff M. A. Warner Jr. is a resident of Minnesota. Plaintiff M.A. Warner Jr. is a beneficiary and a trustee of the M. A. Warner Jr. Revocable Trust which holds a Certificate of Beneficial Interest in the STS Trust.

116. Plaintiff Ted E. Warner is a resident of Minnesota. Plaintiff Ted Warner is co-trustee of the Katherine B. Warner Trust and the H. David Warner Trust, both of which hold Certificates of Beneficial Interest in the STS Trust.

117. Plaintiff Thomas Livingston Warner is a resident of Minnesota. Plaintiff Thomas Warner is a beneficiary holding three Certificates of Beneficial Interest in the STS Trust. Plaintiff Thomas Warner is also the Special Trustee for the Thomas L. Warner Irrevocable Trust, co-trustee of the Katherine B. Warner Trust, and co-trustee of the H. David Warner Trust, all of which hold Certificates of Beneficial Interest in the STS Trust.

118. Plaintiff William Piper Warner, Jr. is a resident of Fort Worth, TX. Mr. Warner is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

119. Plaintiff Dixie Webb is a resident of Alberta, Canada. Plaintiff Webb is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

120. Plaintiff William B. Whiting is a resident of Contoocook, NH. Mr. Whiting is a beneficiary and trustee of the Jean W. Whiting Family Trust holding a Certificate of Beneficial Interest in the STS Trust.

121. Plaintiff, Sarah Warner Whittington, is a resident of Carrollton, TX. Ms. Whittington is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

122. Plaintiff Louise Windsor is a resident of Naples, FL. Ms. Windsor is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

123. Plaintiff Dwight D. Sholes is a resident of Bowdoinham, ME. Mr. Sholes is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

124. Plaintiff Harry Aldrich is a resident of Portland, OR. Mr. Aldrich is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

125. Plaintiff Mary Bly is a resident of New York, NY. Ms. Bly is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

126. Plaintiff Kevin Clarke is a resident of Pendleton, ID. Mr. Clarke is a beneficiary holding a Certificate of Beneficial Interest in the STS Trust.

127. Plaintiffs listed in this Section bring this Action. The Texas Trust Code details the rights of trust beneficiaries with regard to trust litigation. Any interested person may bring an action under Section 115.001 of this the Texas Trust Act. *See* Tex. Prop. Code Ann. § 115.011; *see also* Tex. Prop. Code §§ 111.006, 111.004(16) and 114.008; Tex. Civ. St. Art.

7425b-24. Derivative claims are not necessary in this action. Additionally, under Texas law, a beneficiary of a trust may intervene and contest the right of the plaintiff to recover in an action against the trustee as representative of the trust for a tort committed in the course of the trustee's administration or on a contract executed by the trustee. *See, e.g.*, Tex. Prop. Code Ann. § 115.011(d).

128. Plaintiffs seek recovery of all damages caused by Defendants to the STS Trust by the actions described in this Amended Petition. These damages will be paid to the STS Trust and shared pro rata with each beneficiary of the STS Trust according to their percentage ownership of the Trust. As respects unrepresented non-party holders of beneficial interest in the STS Trust, Plaintiffs anticipate that their efforts will result in the creation of a common fund that benefits all STS Trust beneficiaries. Texas law recognizes the equitable “common fund” doctrine. *See, e.g.*, 48 Tex. Prac., Tex. Lawyer & Jud. Ethics § 1:16 (2013 ed.).

129. Plaintiffs have at all times in this matter been in compliance with Texas Rule of Civil Procedure 39. The names and contact information of the STS beneficiaries are known to Defendants. The Court has provided notice to these beneficiaries on multiple occasions. Defendants have moved on multiple occasions to have all STS beneficiaries declared “necessary” parties to this Action. Defendant has moved on multiple occasions under Texas Rule of Civil Procedure 39. Under the relevant substantive Texas trust law, beneficiaries are necessary parties only when the action is predicated on the act or obligation of a beneficiary. *See TEXAS TRUST ACT*, Art. 7425b-24 (1943) (“If the action is predicated upon any act or obligation of any beneficiary, such beneficiary shall be a necessary party to the proceedings”). On numerous occasions, the Court has exercised its discretion to delay the addition of certain STS beneficiaries to this action—beneficiaries who have been given notice, but have not decided



to opt into this litigation. Decisions by this Court with regard to necessary parties have been within its discretion and clearly supported by Texas Law. *See, e.g., State Office of Risk Mgmt. v. Herrera*, 288 S.W.3d 543, 549 (Tex. App.—Amarillo 2009, no pet.) (“Rule of Civil Procedure 39 provides a pragmatic rather than mechanical approach to dealing with a defect in parties.”); *see also Ernst v. Banker’s Servs. Group, Inc.*, 05-98-00496-CV, 2001 WL 1256524, \*2 (Tex. App.—Dallas Oct. 22, 2001, pet. denied); *Cullum v. Texas Commerce Bank Dallas, Nat. Ass’n*, 05-91-01211-CV, 1992 WL 297338, \*2 (Tex. App.—Dallas Oct. 14, 1992, writ denied).

## V.

### FACTUAL BACKGROUND

#### A. **STS Trust History and Operation**

130. In 1906 Mr. Jed L. Washburn and five other investors purchased approximately 132,000 contiguous acres of land situated in McMullen and LaSalle Counties, Texas. Title to the land was originally taken in the name of George F. Piper and subsequently transferred in 1917 to Jed L. Washburn.

131. Jed L. Washburn issued Certificates of Beneficial Interest to the various owners. Mr. Washburn died in 1931, and in 1932 the owners conveyed title to the land to A. McC. Washburn, who issued Certificates of Beneficial Interest in 30,000 shares in the “South Texas Syndicate” Trust. Each beneficial owner received a Certificate for that part of the 30,000 shares equal to his proportionate interest in the STS Trust property.

132. A. McC. Washburn died in 1939, and in 1940 John T. Pearson was appointed Trustee of the STS Trust. Mr. Pearson died in 1950, leaving no person named as Successor Trustee for the STS Trust.

133. Originally, the ownership of the STS Trust assets was in fee, with the initial purchasers owning both the surface and mineral estate. In 1950, the surface of the land was sold and since then the sole asset of the STS Trust has been the mineral estate in the 132,000 acres.

134. The Alamo National Bank was appointed Successor Trustee of the STS Trust on February 12, 1951 by order of the District Court, 73<sup>rd</sup> Judicial District, Bexar County, Texas. JP Morgan and its predecessor banks have acted as Successor Trustee since that date.

135. The STS Trust has been the subject of published legal opinions and an IRS private letter ruling. The STS Trust was determined to be a liquidating trust and the Trustee was granted the authority to continue that liquidation.

136. The 1951 Decree permits the following compensation for the Trustee, in relevant part:

- a. “reasonable compensation” on sales of trust assets;
- b. 2.5% of disbursements for “routine services and responsibilities as Trustee, including taking title of trust properties, ordinary management of trust properties, assessing of the trust properties for taxation, appearing before boards of equalization, [and] receiving, checking and disbursing of the royalties from trust properties;”
- c. A “reasonable fee” for “extraordinary services which the Trustee may be called upon to perform in connection with the trust estate;” and
- d. “Reimbursement for actual out-of-pocket expenses and reasonable attorneys’ and accountants’ fees incurred in connection with the said trust properties.”

137. The STS Trust estate currently consists primarily of the title to the minerals under approximately 132,000 acres of land in La Salle and McMullen Counties, Texas, mineral lease rights, and cash.

138. Defendant Aymes is the principal officer and employee at JP Morgan involved in administering the STS Trust. Aymes holds the title of “Executive Director” in the JP Morgan Trust Department.

**B. As a Condition of Its Appointment, the Current STS Trustee Agreed to Resign Upon Written Request From Holders of Fifty-One Percent (51%) of the Outstanding Shares of the STS Trust.**

139. Following the death of its previous trustee, from October 1950 through January 1951, beneficiaries of the STS Trust and representatives of the previous trustee (John T. Pearson) negotiated on behalf of themselves and all STS Trust beneficiaries with Alamo National Bank regarding the conditions of its appointment as Successor Trustee of the South Texas Syndicate Trust.

140. On October 27, 1950, the Alamo National Bank initially proposed that it would resign as trustee upon request of holders of two-thirds of Certificates of Beneficial Interest in the STS Trust. On November 13, 1950, the Alamo National Bank subsequently suggested that it would resign upon request of holders of seventy-five percent (75%) of Certificates of Beneficial Interest in the STS Trust.

141. Certain beneficiaries insisted that Alamo National Bank agree to resign upon request of holders of fifty-one percent (51%) of Certificates of Beneficial Interest in the STS Trust and the prospective trustee agreed.

142. The current trustee would not have been appointed but for its agreement to resign upon the request of holders of fifty-one percent (51%) of Certificates of Beneficial Interest in the STS Trust.

143. The current trustee (JP Morgan claims to be trustee by virtue of the 1951 appointment of Alamo National Bank as trustee of the STS Trust) agreed to resign on written request by holders of Fifty-One percent of outstanding shares in the STS Trust.

144. On January 4, 1951 Alamo National Bank sent a telegram amending its November 13, 1950 letter and agreeing to resign on written request of fifty-one percent of outstanding shares.

145. On January 8, 1951, counsel for STS beneficiaries wrote to the Alamo National Bank, further confirming that Alamo National Bank, if appointed successor trustee, stood committed to resign when authorized by the holders of not less than 51% of the total shares in the trust estate.

146. In a January 8, 1951 letter, Alamo National Bank again confirmed its agreement to resign when authorized by holders of not less than fifty-one (51%) of the total shares in the Trust Estate.

147. In a January 12, 1951 letter, a representative of STS beneficiaries again confirmed Alamo National Bank's agreement to resign on the request of 51% of the outstanding shares.

148. JP Morgan claims its rights as Trustee of the STS Trust by virtue of its succession in interest from the Alamo National Bank and is therefore equally bound by the promises made by Alamo in the course of its negotiation to be appointed Trustee.

### **C. JP Morgan's Mismanagement and Tortious Actions**

#### **1. The Current STS Trustee Has Long Been on Notice That Holders of More Than 51% of the Outstanding Shares of the STS Trust Have Sought, in Writing, to Have It Removed as Trustee.**

149. Defendant JP Morgan has been on notice that it must resign as trustee since January of 2012 when individuals and entities owning, holding and/or controlling more than fifty-one percent (51%) of the outstanding shares intervened in the existing litigation between the Defendants and the Meyer/Blaze plaintiffs, demanding in their pleadings in intervention that JP Morgan be removed as trustee. Instead of resigning as JP Morgan is contractually obligated to do, Defendants have refused to resign.

150. On February 11, 2013, Plaintiffs sent a letter to Defendants again putting Defendants on notice that “pursuant to the terms and conditions of the 1951 appointment of the Alamo National Bank as Successor Trustee of the South Texas Syndicate Trust, more than fifty-one percent (51%) of the beneficial interests have requested that J.P. Morgan Chase Bank, N.A. resign as Trustee of the South Texas Syndicate Trust.” Plaintiffs further demanded Defendants “confirm that J.P. Morgan Chase Bank N.A. agrees to resign as Trustee of the South Texas Syndicate Trust.” Plaintiffs further requested Defendants please contact Plaintiffs “at your earliest convenience to discuss an orderly transition in connection with the appointment of a Successor Trustee.” The February 11, 2013 Letter was accompanied by signed, written requests by holders of more than fifty-one percent (51%) of the outstanding shares in the STS trust that the current trustee resign.

151. Defendants did not respond.

152. On February 19, 2013, Plaintiffs sent a second letter – this letter directed to counsel for the Trustee in this litigation. In this second letter, counsel for STS beneficiaries references the February 12, 2013 letter requesting the current trustee’s resignation and further writing, “It has now been a week and we have not received a response of any nature from you or J.P. Morgan. . . .Once again, we request confirmation that J.P. Morgan intends to resign as Trustee of the South Texas Syndicate Trust. If we have not received confirmation by the close of business on Wednesday, February 20, 2013, we will assume that J.P. Morgan decided to further breach its contract and refuses to resign. We will then proceed as appropriate under the circumstances to confirm the resignation.”

153. On February 20, 2013, Defendants responded to the February 11, 2013 and February 19, 2013 Letters by asking a number of questions but refusing to resign. In its February 20, 2013 letter, JP Morgan also demanded to know the identity of the successor trustee.

154. On February 25, 2013, Plaintiffs responded by letter to Defendants' February 20, 2013 Letter. Plaintiffs answered Defendants' questions and identified documents that contain the current trustee's agreement to resign upon written notice from holders of holders of fifty-one percent (51%) of the outstanding shares of the STS Trust. All of the documents Plaintiffs identified were produced by Defendants in this action from its hardcopy STS Trust files after many wasteful hearings and a court order compelling Defendants to produce these STS Trust files to the STS Trust beneficiaries.

155. Instead of fulfilling its contractual obligation to resign, on March 7, 2013 Defendant JP Morgan filed its Counter-Petition for Declaratory Relief and Instructions from the Court ("Counter-Petition").

**2. Defendants' Continuing Breach of Their Fiduciary Duties and Interference with the Proper Functioning of the STS Trust.**

156. Defendants' duty to resign was triggered as soon as Defendants were aware holders of fifty-one percent or more of the outstanding shares in the STS trust sought their resignation in writing. Plaintiffs are being damaged by Defendants' continued use and misuse of STS Trust assets including: (1) STS Trust documents and files; (2) STS Trust funds; (3) the title of "Trustee" of the STS Trust; (4) the right to appear in court and/or act in the legal capacity of "Trustee" of the STS Trust; and (5) the ability to bind the STS Trust to agreements with third parties.

157. Defendants have informed the STS Trust beneficiaries that they believe this may be a critical time to evaluate strategic options for the STS Trust. In fact, Defendants have

engaged the services of the law firm Jackson Walker LLP and the investment bank Lazard Frères to assist in the evaluation of alternatives and potentially sell the assets of the STS Trust.

158. Instead of fulfilling their fiduciary duties and participating in an orderly transition, Defendants are interfering with the functioning of the STS Trust. By refusing to participate in an orderly transition, Defendants are impeding a successor trustee's evaluation of its alternatives during this purportedly critical time. Instead of attempting to delay trustee succession through pointless judicial process that is not part of the conditions upon which the current trustee was appointed, Defendants should immediately declare its willingness to participate in an orderly transition and prepare to transfer all trust-related documents (including investment banking opinions and other trust analyses) to a successor trustee.

159. By interfering with an orderly transition to a successor trustee, Defendants are also interfering with potential deals for the sale of STS Trust assets and/or the reformation and restructuring of the STS Trust.

160. By interfering with an orderly transition to a successor trustee and wrongfully retaining its position as trustee of the STS Trust, Defendants are continually accessing information that it no longer has the right to access. Additionally, with regard to newly-obtained information, Defendants are violating the STS beneficiaries' right to confidentiality with each new piece of confidential Trust-related information they review.

161. Defendants have been on notice at least since the filing of the Pleas in Intervention in January 2012 that holders of more than fifty-one percent (51%) of the outstanding shares of the STS Trust have requested in writing that it resign as trustee. Every disclosure of Trust-related information to a third party after Defendants were put on notice that holders of more than fifty-one percent of the beneficial interests sought to remove JP Morgan as trustee is

an independent breach of the STS Trust beneficiaries' right to confidentiality and Defendants' fiduciary duties.

162. Defendant JP Morgan no longer has a legitimate claim to the trusteeship of the STS Trust and must resign. Defendants have no right to dictate procedures for the appointment of a successor trustee. Defendants are further breaching their fiduciary duties by demanding Court intervention before it complies with its agreement to resign. Defendants lack standing to petition the Court regarding successor trustee issues. Defendants should immediately begin preparing all STS Trust property (including all documents in JP Morgan's possession custody or control) for transfer to a successor trustee.

### **3. Defendants' Additional Breaches of Duty**

163. Instead of performing its duties as trustee in the exercise of prudence and good judgment consistent with its fiduciary obligations to the beneficiaries of the STS Trust, JP Morgan has administered and managed the STS Trust to produce profits for itself and various banking clients of JP Morgan, among other things.

164. For a number of years, JP Morgan has charged the STS Trust unreasonable and unauthorized compensation, fees, and expenses. In the last four years alone, JP Morgan has collected approximately \$1,600,000.00 in Trustee fees while performing minimal and un-demanding work.

165. JP Morgan's fees are not authorized by or consistent with the terms of the 1951 Decree in that the fees are: (1) excessive; (2) unreasonable; (3) compensation for acts not authorized by the trust instrument; and/or (4) compensation taken without providing disclosures (including disclosure of conflicts of interest) required of a trustee and fiduciary in Texas.



166. JP Morgan has failed to seek judicial clarification and reformation of Trust instrument terms that JP Morgan admits are “unclear” and “undefined”. On information and belief, JP Morgan resisted the judicial reformation of the STS Trust instrument which would have been in the best interests of the STS Trust beneficiaries because JP Morgan believed it would lose revenues if JP Morgan allowed an appropriate trust instrument to be amended by a decree of a Texas court.

167. JP Morgan has interpreted the 1951 Decree in a self-serving manner to unlawfully increase JP Morgan’s profits for administration of the STS Trust.

168. Further, it is apparent from the unreasonable compensation, fees, and expenses that JP Morgan has collected from the STS Trust that JP Morgan has taken a self-serving and improper interpretation of what constitutes “extraordinary services” under the 1951 Decree and, further, what constitutes a “reasonable fee” for such services (assuming that any such services actually constitute “extraordinary services,” which Plaintiffs deny).

169. JP Morgan has also construed the reimbursement provision of the 1951 Decree in a self-serving and improper manner and has caused the STS Trust to pay unreasonable consulting and legal fees including legal fees related to: (1) a legal opinion that apparently provides a benefit solely to JP Morgan and does not provide any benefit or value to the STS Trust or its beneficiaries; (2) litigation against JP Morgan by beneficiaries seeking to remove JP Morgan as Trustee; (3) legal advice relied upon to justify changing the Trustee’s rights and duties under the Trust instrument, yet withheld from the beneficiaries; and (4) litigation against STS Trust lessees.

170. JP Morgan failed to investigate alterations of the trust relationship and/or trust structure (*e.g.* royalty trust structure, clarification and alteration of trustee duties and

responsibilities, *et cetera*) that would promote the interests of the beneficiaries. Upon information and belief, JP Morgan avoided making changes in the trust relationship and structure because such changes would threaten the revenues JP Morgan receives for administering the STS Trust.

171. JP Morgan has failed to disclose conflicts of interest on a number of transactions. These failures include, but are not limited to, negotiating mineral leases with Petrohawk and Reliance and litigating mineral lease rights with Pioneer and EOG. Such conduct is to the detriment of the Plaintiffs and the other beneficiaries and a violation of the Trustee's fiduciary duties, Texas trust statutes and other applicable law. Under Texas law, JP Morgan must be held accountable to the STS Trust beneficiaries.

172. Throughout its time as Trustee, JP Morgan has been secretive, vague, and/or tardy in its limited and inadequate communications with the Plaintiffs and the other beneficiaries, all in violation of applicable law and its fiduciary duty to affirmatively disclose all material facts known to it which might affect the beneficiaries' rights and interests. JP Morgan has failed to provide access to financial statements, accounting and auditing documents and other records (including documents that reflect the development and application of the method for calculating payments to beneficiaries). When Plaintiffs sought this and other material information, JP Morgan responded that Plaintiffs would have to file suit to get the information.

173. Throughout its time as Trustee, JP Morgan has ignored or refused numerous requests for information that materially affect the rights of the Plaintiffs and other beneficiaries in violation of the Trustee's fiduciary duties and applicable law. JP Morgan has failed to provide the information that would allow the STS Trust beneficiaries a reasonable opportunity to evaluate how well their trust is being administered. For example, when administering a trust

with mineral interests, a crucial factor in determining whether the trust is being competently administered is the evaluation of the terms obtained by the trustee for leases of trust assets. JP Morgan has refused to disclose the leases to the beneficiaries. Using this tactic, JP Morgan has hidden material information from beneficiaries and has made it impossible for the STS beneficiaries to hold JP Morgan accountable.

174. Throughout its time as Trustee, JP Morgan has failed to reasonably manage the STS Trust property and to evaluate and to value the Trust's mineral rights and has failed to take advantage of opportunities to maximize the value of the Trust property for the beneficiaries. In this regard, the Trustee has made no efforts to evaluate and to value numerous known and existing geological formations. JP Morgan's conduct, about which Plaintiffs complain, includes, but is not limited to, the actions taken and not taken regarding both 666.99 acre Activa Leases, the 646.49 acre Activa Lease, the Ellsworth Lease, the 12,772 acre Petrohawk Lease, the 12,073 acre Petrohawk Lease, the 16,903 acre Petrohawk Lease, the 15,456 acre Petrohawk Lease, the 3,845 acre Petrohawk Lease, the 18,473 acre Petrohawk Lease, the 9416.785 Whittier Lease, the 128.66 acre Mina Lease, the 4457.01 acre BlackBrush Lease, and the Bishop Lease. In addition, JP Morgan's conduct, about which Plaintiffs complain, includes, but is not limited to, the actions taken and not taken in filing, litigating and settling an action against Pioneer Natural Resources USA, Inc. and EOG Resources, Inc., previously pending as Cause No. 09-04-00036-CVL; *JP Morgan Chase Bank, N.A., in its capacity as Trustee of the South Texas Syndicate Trust v. Pioneer Natural Resources USA, Inc. and EOG Resources, Inc.*; in the 218th Judicial District Court, LaSalle County, Texas. This conduct is in violation of the Trustee's fiduciary duties and applicable law.

175. Throughout its time as Trustee, JP Morgan has paid unreasonable consulting and legal fees to various third parties out of the STS Trust's assets and income. Upon information and belief, the payment of certain of these fees to third parties directly and/or indirectly benefitted JP Morgan and/or its clients other than the Trust beneficiaries, to the detriment of Plaintiffs and all beneficiaries. These payments were tainted by conflicts of interest and constituted self-dealing in violation of the Trustee's fiduciary duty of loyalty and applicable law.

176. Throughout its time as Trustee, JP Morgan has jeopardized the interests of the beneficiaries by failing to adequately communicate with lessees of STS Trust property and/or otherwise impairing these lessees' ability to put the STS Trust property to profitable uses and to maximize the value of the Trust property for the beneficiaries, to the detriment of Plaintiffs and the other beneficiaries and in violation of the Trustee's fiduciary duties and applicable law.

177. During the time he served as Fiduciary Officer, Aymes has falsely represented to Plaintiffs and others, to their resulting detriment, that he and others employed by JP Morgan are "constantly monitoring the activity" of the Trust and "maintain[ing] the highest fiduciary and land management principles to insure [the STS Trust's] assets are properly managed." He has, further, knowingly participated with JP Morgan in the conflicts of interest, breaches of fiduciary duties, breaches of trust, and violations of applicable law, identified herein. As such, Aymes is jointly and severally liable with JP Morgan to Plaintiffs.

178. As a result of the conduct identified above, Plaintiffs have suffered economic injury in that Plaintiffs' beneficial interests and the income Plaintiffs are entitled to therefrom were impaired and reduced by: (1) the payment of unreasonable compensation, fees, and expenses to the Trustee and to third parties; (2) the Trustee's failure to adequately evaluate, value and manage the STS Trust property and to maximize the value of the STS Trust property for the

beneficiaries; (3) the Trustee's failure to negotiate market-rate lease terms for Trust assets; (4) the Trustee's failure to act competently on the beneficiaries' behalf in legal and negotiation matters related to the STS Trust; and (5) the Trustee's failure to provide information as properly requested by the beneficiaries.

179. Based on the results of the accounting and the inspection of books and records to which Plaintiffs are entitled, Plaintiffs also reserve the right to seek damages resulting from the underpayment of net proceeds derived from STS Trust property pursuant to the terms of the 1951 Decree.

180. The causes of action asserted by Plaintiffs against Defendants herein are timely filed as the discovery rule deferred accrual of the respective statutes of limitations for such causes of action. Plaintiffs' damages resulting from Defendants' misconduct alleged herein were inherently undiscoverable and objectively verifiable. Plaintiffs did not discover the injuries caused by the wrongful acts of Defendants alleged herein until no earlier than a time within the applicable statutes of limitations.

181. The causes of action asserted by Plaintiffs against Defendants are timely filed as Defendants fraudulently concealed the wrongful conduct alleged herein, thereby tolling the applicable statutes of limitations. Defendants had actual knowledge of the wrongful conduct alleged herein. Defendants concealed the wrongful acts and omissions alleged herein by remaining silent and/or making misrepresentations about wrongful conduct despite having a duty to inform Plaintiffs of such wrongful acts and omissions. Defendants' silence and misrepresentations prevented Plaintiffs from discovering Defendants' wrongful acts and omissions. Defendants had a fixed purpose to conceal the wrongful conduct. Plaintiffs reasonably relied on Defendants' silence and misrepresentations to the detriment of Plaintiffs.

182. The causes of action asserted by Plaintiffs against Defendants are timely filed pursuant to the Continuing Tort Doctrine as the Defendants' wrongful conduct was repeated for a period of time and continued until at least the filing of this action.

## VI.

### **FIRST CAUSE OF ACTION – BREACH OF FIDUCIARY DUTY/BREACH OF TRUST**

183. Plaintiffs repeat, re-allege and incorporate each and every prior factual allegation in the preceding paragraphs as if fully set forth herein.

184. The Defendants, as the Trustee and Fiduciary Officer, were Plaintiffs' fiduciaries. Plaintiffs placed their trust and confidence in Defendants, and Defendants had influence and superiority over Plaintiffs. As fiduciaries, Defendants owed Plaintiffs all of the fiduciary duties imposed on them under the Texas Trust Act, Texas Trust Code, common law, and the 1951 Decree.

185. Through the activity set out herein, Defendants breached their fiduciary duties to Plaintiffs, including but not limited to, the following actions and inactions:

- a. Failing and refusing to provide an accounting despite repeated requests from the beneficiaries to do so;
- b. Failing to maintain accurate and complete books and records;
- c. Failing to provide access to financial statements, accounting and auditing documents and other records that do exist (including documents that reflect the development and application of the method for calculating payments to beneficiaries);
- d. Failure to provide access to documents that would allow beneficiaries the opportunity to evaluate whether JP Morgan acted competently on the beneficiaries' behalf in legal matters related to the Trust, including but not limited to documents related to mineral leases entered on behalf of the STS Trust and to the Pioneer/EOG litigation and settlement;
- e. Delegating acts that the Trustee is required to perform;

- f. Failing and refusing to disclose and/or inform Plaintiffs and other beneficiaries of material facts that significantly affect Plaintiffs' and other beneficiaries' rights and interests;
- g. Providing inaccurate and false information to Plaintiffs and other beneficiaries regarding matters that significantly affect Plaintiffs' and other beneficiaries' rights and interests;
- h. Failing and refusing to inform Plaintiffs and other beneficiaries of the Trustee's intent regarding the past, current, and future administration of the Trust estate;
- i. Failing to fulfill the fiduciary duties of good faith, fair dealing, loyalty, and fidelity over the Trust's affairs and the Trust property by, *inter alia*, entering into arrangements with third parties that present an actual or potential conflict of interest for the Trustee to the detriment of Plaintiffs and other beneficiaries, including arrangements with Petrohawk, Pioneer, and EOG;
- j. Failing to fulfill the fiduciary duties of good faith, fair dealing, loyalty, and fidelity over the Trustee's affairs and the Trust property by, *inter alia*, entering into arrangements with third parties that contained provisions that were significantly below market, depriving the Trust of significant revenue;
- k. Failing to fulfill the duty to not engage in self-dealing by, *inter alia*, entering into arrangements with third parties that directly or indirectly benefited the Trustee to the detriment of Plaintiffs and other beneficiaries;
- l. Failing to manage the Trust assets solely in the interest and for the benefit of the beneficiaries;
- m. Failing to use reasonable care and skill to maximize the value of the Trust property and assets for the benefit of the beneficiaries;
- n. Failing to comply with the instrument creating the Trust with respect to payments to the Trustee and to the beneficiaries;
- o. Charging excessive, unreasonable, unnecessary, and unauthorized fees to the Trust;
- p. Paying excessive, unreasonable, unnecessary, and unauthorized fees to third parties out of the Trust income and assets;
- q. Failing to adequately communicate with lessees of the property and/or otherwise impairing these lessees' ability to put the Trust property to profitable uses and to maximize the value of the Trust property for the beneficiaries; and

- r. Failing to prudently monitor the activity of the Trust property and assets and maintain the highest fiduciary and land management principles to insure the Trust's assets are properly managed.
- s. Refusing to resign after being lawfully requested to do so.
- t. Accessing confidential STS Trust information after they have lawfully been requested to resign and refused to do so.
- u. Providing third parties, including but not limited to law firms, investment banks, oil and gas companies, and STS lease counterparties with confidential STS Trust information after they have been lawfully requested to resign and refused to do so.
- v. Holding themselves out as representing the STS Trust as Trustee or agent after they have been lawfully requested to resign and refused to do so.
- w. Negotiating or forming agreements on behalf of the STS Trust and its beneficiaries after they have been lawfully requested to resign and refused to do so.

186. As a result of the actions by Defendants described herein, Plaintiffs have suffered damages. These damages include, but are not limited to, damages sustained in the past, damages that in reasonable probability will be sustained in the future, reduced distributions, and exemplary damages. Plaintiffs' damages further include, but are not limited to, loss of past and future bonus payments, rental payments, royalty payments, and other payments to which Plaintiffs were reasonably entitled, attorneys' fees and expenses JP Morgan has charged to the Trust, including the attorneys' fees and expenses incurred by Defendants in this action, and attorneys' fees and expenses incurred by Plaintiffs in prosecuting this action. Plaintiffs further seek recovery of pre-judgment and post-judgment interest under the common law and applicable statutes.

187. Defendant Aymes knowingly participated in the breaches of fiduciary duties identified herein, aided and abetted the Trustee in such breaches of fiduciary duties, and is jointly and severally liable as a joint tortfeasor.



188. The acts described herein were done in bad faith and with an improper motive.

189. The acts described herein constituted fraud, malice, negligence, and/or gross negligence on the part of the Defendants.

190. As a result of the conduct identified above, Plaintiffs have suffered economic injury in that Plaintiffs' beneficial interests and the income Plaintiffs were entitled to therefrom were impaired and reduced by: (1) the payment of excessive and unreasonable compensation, fees, and expenses to the Trustee and third parties; (2) the Trustee's failure to adequately evaluate, value and manage the Trust property and maximize the value of the Trust property for the beneficiaries; (3) the Trustee's failure to negotiate market-rate lease terms for trust assets; (4) the Trustee's failure to act competently on the beneficiaries' behalf in legal matters related to the Trust; and (5) the Trustee's failure to provide information as properly requested by beneficiaries.

191. Plaintiffs have fulfilled all conditions precedent for recovery on these claims.

192. As a proximate cause of the foregoing, Plaintiffs have been injured in an actual amount to be proven at trial and should be awarded actual, exemplary, consequential and incidental damages in accordance with the evidence, plus attorneys' fees, expenses, and costs.

## **VII.**

### **SECOND CAUSE OF ACTION – FRAUD**

193. Plaintiffs repeat, re-allege and incorporate each and every prior factual allegation in the preceding paragraphs as if fully set forth herein.

194. In the alternative and without waiving the foregoing, the acts and omissions of the Defendants referenced above constitute fraud, which proximately caused damage to Plaintiffs, which damages Plaintiffs should recover and seek to recover from the Defendants, individually, jointly and severally. These representations and actions were made knowingly, falsely, and with

the intent that Plaintiffs would rely on each of them. Plaintiffs did, in fact, rely on Defendants' fraudulent acts and/or omissions.

195. Aymes is individually liable for the fraud arising from his individual actions.

196. Plaintiffs are also entitled to recover and seek to recover punitive damages from JP Morgan and Aymes, taking into account the net worth of each.

## **VIII.**

### **THIRD CAUSE OF ACTION – FRAUD BY NONDISCLOSURE**

197. Plaintiffs repeat, re-allege and incorporate each and every prior factual allegation in the preceding paragraphs as if fully set forth herein.

198. Defendants concealed from Plaintiffs, or failed to disclose to Plaintiffs, facts related to Defendants' management of STS Trust assets.

199. Defendants had the duty to disclose the facts to Plaintiffs because of special and/or fiduciary relationships.

200. The non-disclosed facts were material in that they would have been important to Plaintiffs in the making of certain decisions related to Defendants and the management of STS Trust assets. Additionally, any reasonable person would have attached importance to the non-disclosed facts.

201. Defendants knew Plaintiffs were not aware of facts that Defendants had a duty to disclose.

202. Defendants knew Plaintiffs did not have equal opportunity to discover the facts.

203. Defendants were deliberately silent when they had a duty to speak.

204. By failing to disclose the facts, Defendants intended to induce Plaintiffs to continue to allow Defendants to administer and manage STS Trust assets.

205. Plaintiffs relied on Defendants' nondisclosure.

206. As a proximate cause of the foregoing, Plaintiffs have been injured in an actual amount to be proven at trial and should be awarded actual, exemplary, consequential and incidental damages from Defendants, jointly and severally, in accordance with the evidence.

**IX.**

**FOURTH CAUSE OF ACTION –  
NEGLIGENT MISREPRESENTATION**

207. Plaintiffs repeat, re-allege and incorporate each and every prior factual allegation in the preceding paragraphs as if fully set forth herein.

208. In the alternative and without waiving the foregoing, the acts and omissions of the Defendants referenced above constitute negligent misrepresentation, which proximately caused damage to Plaintiffs, which damages Plaintiffs should recover and seek to recover from the Defendants, individually, jointly and severally. Aymes is individually liable for the misrepresentations arising from his individual actions.

209. As a proximate cause of the foregoing, Plaintiffs have been injured in an actual amount to be proven at trial and should be awarded actual, exemplary, consequential and incidental damages from Defendants, jointly and severally, in accordance with the evidence.

**X.**

**FIFTH CAUSE OF ACTION – REMOVAL OF TRUSTEE AND FORFEITURE OF FEES  
FOR BREACHES OF DUTY, NEGLIGENCE AND INCOMPETENCE**

210. Plaintiffs repeat, re-allege and incorporate each and every prior factual allegation in the preceding paragraphs as if fully set forth herein.

211. Due to the conduct described herein, Plaintiffs seek removal of JP Morgan and Aymes as Trustee of the Trust pursuant to Sections 113.082(a)(1) and (4) and 114.008(a)(7) of the Texas Property Code and Tex. Civ. St. Art. 7425b-39 of the Texas Trust Act, as well as the appointment of a successor trustee.

212. Plaintiffs further seek forfeiture and return of some or all of the Trustee fees paid or incurred to the fullest extent allowed by Texas Property Code § 114.061(b), Tex. Civ. St. Art. 7425b-1 *et seq.* of the Texas Trust Act, and applicable Texas law.

## **XI.**

### **SIXTH CAUSE OF ACTION – SPECIFIC PERFORMANCE OF THE TRUSTEE’S AGREEMENT TO RESIGN**

213. Plaintiffs repeat, re-allege and incorporate each and every prior factual allegation in the preceding paragraphs as if fully set forth herein.

214. In 1951, as a condition of the appointment of the current STS trustee, representatives of the former trustee and the beneficiaries of the STS Trust made a valid agreement pursuant to which the current STS trustee agreed to resign upon written request by holders of fifty-one percent of the outstanding shares in the STS Trust.

215. Holders of fifty-one percent of the outstanding shares in the STS Trust have repeatedly requested Defendants resign.

216. Defendants have repeatedly refused to resign.

217. Plaintiffs have been injured by Defendants refusal to resign as agreed.

218. Damages do not adequately compensate Plaintiffs for the damage being inflicted by Defendants’ refusal to resign as agreed.

219. Plaintiffs are entitled to specific performance of its current trustee’s agreement to resign.

## **XII.**

### **SEVENTH CAUSE OF ACTION – ATTORNEYS’ FEES**

220. Plaintiffs repeat, re-allege and incorporate each and every prior factual allegation in the preceding paragraphs as if fully set forth herein.

221. As a result of Defendants' wrongful acts and omissions, Plaintiffs retained the undersigned attorneys to represent them and agreed to pay their reasonable and necessary attorneys' fees, expenses, and costs. Plaintiffs seek recovery of their reasonable and necessary attorneys' fees, expenses, and costs through trial and all appeals under applicable Texas law, including but not limited to, the Texas Trust Act, the Texas Trust Code, and as otherwise authorized by law.

**XIII.**

**DEMAND FOR JURY TRIAL**

222. Plaintiffs hereby demand a trial by jury.

**XIV.**

**GENERAL DENIAL**

223. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Plaintiffs/Counter-Petition Defendants' deny each and every, all and singular, the material allegations in Defendants/Counter-Petition Plaintiffs' Counter-Petition for Declaratory Relief and Instructions from the Court, and demand strict proof thereof by a preponderance of the evidence.

**XV.**

**PRODUCTION OF DOCUMENTS**

224. Plaintiffs hereby place Defendants on notice that Plaintiffs intend to use any document produced by Defendants in any pretrial proceeding or at trial.

**XVI.**

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs request that on final hearing Plaintiffs have judgment against Defendants, jointly and severally, for:

- a. Actual damages;

- b. Consequential and incidental damages;
- c. Disgorgement of all compensation, fees, and expenses paid by the STS Trust to Defendants and to third-parties at the direction of Defendants;
- d. Pre- and post-judgment interest at the highest legal rate allowed by law;
- e. All attorneys' fees, expenses, and costs in pursuing this matter;
- f. Exemplary or punitive damages in an amount to be determined at trial;
- g. An order compelling the Defendants to perform an accounting, maintain accurate and complete books and records, and permit an inspection of the books and records;
- h. An order prohibiting Defendants from using Trust assets, property, or revenue, to pay attorneys' fees, expenses, and costs in defending this action and any other actions brought by other beneficiaries;
- i. Such other and further relief to which Plaintiffs may show themselves to be justly entitled; and
- j. Such other, further, and different damages as allowed in accordance with the evidence and applicable law.

Plaintiffs further request all relief sought in JP Morgan's Defendants/Counter-Petition Plaintiffs' Counter-Petition for Declaratory Relief and Instructions from the Court be denied.

DATE: January 21, 2014.

Respectfully submitted,

**CLEMENS & SPENCER, P.C.**

GEORGE SPENCER, JR.  
State Bar No. 18921001  
112 E. Pecan St., Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

**DROUGHT DROUGHT & BOBBITT,  
LLP**

JAMES L. DROUGHT  
State Bar No. 06135000  
112 E. Pecan St., Suite 2900  
San Antonio, Texas 78205  
Telephone: (210) 225-4031  
Facsimile: (210) 222-0586

**TINSMAN & SCIANO, INC.**

RICHARD TINSMAN  
State Bar No. 20064000  
10107 McAllister Freeway  
San Antonio, Texas 78205  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

**LOEWINSOHN FLEGLE DEARY, L.L.P.**

DAVID R. DEARY  
State Bar No. 05624900  
JIM L. FLEGLE  
State Bar No. 07118600  
MICHAEL J. DONLEY  
State Bar No. 24045795  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
Telephone: (214) 572-1700  
Facsimile: (214) 572-1717

**ZELLE HOFMANN VOELBEL & MASON  
LLP**

JOHN B. MASSOPUST (pro hac vice)  
MATTHEW J. GOLLINGER (pro hac vice)  
500 Washington Avenue South, Suite 5000  
Minneapolis, Minnesota 55415  
Telephone: (612) 339-2020  
Facsimile: (612) 336-9100

STEVEN J. BADGER  
Texas State Bar No. 01499050  
ASHLEY BENNETT JONES  
Texas State Bar No. 24056877  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
Telephone: (214) 742-3000  
Facsimile: (214) 760-8994

By: /s/ Michael J. Donley

**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing instrument has been served on the below listed counsel of record via the method indicated, this 21<sup>st</sup> day of January 2014:

Patrick K. Sheehan  
David Jed Williams  
Mark A. Randolph  
Kevin M. Beiter  
Hornberger Sheehan Fuller  
Beiter Wittenberg & Garza Inc.  
The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, TX 78209

*Via First Class Mail*

Mark T. Josephs  
Sara Hollan Chelette  
Jackson Walker, LLP  
901 Main Street, Suite 6000  
Dallas, TX 75202

*Via First Class Mail*

Fred W. Stumpf  
Kelly M. Walne  
Boyer Short, PC  
Nine Greenway Plaza, Suite 3100  
Houston, TX 77046

*Via First Class Mail*

/s/ Michael J. Donley



(Consolidated Under)  
**CAUSE NO. 2010-CI-10977**

<b>JOHN K. MEYER, ET AL.</b>	§	<b>IN THE DISTRICT COURT</b>
<b>Plaintiffs,</b>	§	
	§	
<b>vs.</b>	§	
	§	
<b>JP MORGAN CHASE BANK, N.A.</b>	§	<b>225<sup>TH</sup> JUDICIAL DISTRICT</b>
<b>INDIVIDUALLY/CORPORATELY</b>	§	
<b>AND AS TRUSTEE OF THE SOUTH</b>	§	
<b>TEXAS SYNDICATE TRUST</b>	§	
<b>and GARY P. AYMES,</b>	§	
<b>Defendants.</b>	§	<b>BEXAR COUNTY, TEXAS</b>

**PLAINTIFFS' MOTION TO COMPEL ATTENDANCE AT DEPOSITION**

(Joseph Allman)

TO THE HONORABLE JUDGE OF SAID COURT:

Now come Plaintiffs, John K. Meyer, et al., in the above-styled and numbered cause, and file this Motion to Compel Joseph Allman's deposition, and would respectfully show the Court the following:

1. On December 31, 2013, Plaintiffs sent to Defendants a notice scheduling the deposition of Joseph Allman, an employee of JP Morgan, a copy of which is attached as **Exhibit A**.
2. A series of emails ensued regarding the deposition, with JPM ultimately deciding to oppose it. See emails attached as **Exhibit B**.
3. Joseph Allman is an Executive Director at JP Morgan. Mr. Allman is in possession of information relevant to the subject matter of the pending action. It is not grounds for objection that the information sought will be inadmissible at trial if the

information sought appears reasonably calculated to lead to the discovery of admissible evidence.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs request that this Court order the witness to appear for deposition and set the time and location therefor, and for any other additional relief to which Plaintiffs may be justly entitled.

Respectfully submitted,

John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By: \_\_\_\_\_ /s/

James L. Drought

[jld@ddb-law.com](mailto:jld@ddb-law.com)

State Bar No. 06135000

**ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.**



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been sent  
by:

\_\_\_\_\_ U.S. Certified Mail, Return Receipt Requested to:  
  ✓\_\_\_\_\_ Facsimile to:  
\_\_\_\_\_ First Class Mail to:  
\_\_\_\_\_ Hand Delivery to:

Mr. Patrick K. Sheehan  
Mr. Rudy Garza  
Mr. David Jed Williams  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Mr. John C. Eichman  
Ms. Amy S. Bowen  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202

Mr. Fred W. Stumpf  
Boyer Short, A Professional Corporation  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046

on this the 21<sup>st</sup> day of January, 2014.

\_\_\_\_\_  
                                  */s/*  
James L. Drought

(Consolidated Under)  
CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET AL.	§	IN THE DISTRICT COURT
Plaintiffs,	§	
	§	
vs.	§	
	§	
JP MORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	225 <sup>TH</sup> JUDICIAL DISTRICT
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES,	§	
Defendants.	§	BEXAR COUNTY, TEXAS

NOTICE OF INTENTION TO TAKE ORAL AND  
VIDEOTAPED DEPOSITION OF JOSEPH ALLMAN

TO: Joseph Allman  
c/o Mr. Patrick K. Sheehan  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Please take notice that on behalf of Plaintiffs and Plaintiff-Intervenors, the oral and videotaped deposition of **Joseph Allman** will be taken upon oral examination beginning at **9:30 a.m. on February 14, 2014**, and his answers may be used as testimony in the above-numbered and entitled cause. Said deposition will be taken at the offices of Hornberger Sheehan Fuller Beiter Wittenberg & Garza, Inc., The Quarry Heights Building, 7373 Broadway, Suite 300, San Antonio, TX 78209, by an official court reporter.

Please take notice that this deposition will be video recorded.

Respectfully submitted,

John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By: 

James L. Drought  
State Bar No. 06135000

**ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent by:

U.S. Certified Mail, Return Receipt Requested to:  
 Facsimile to:  
 First Class Mail to:  
 Hand Delivery to:


Mr. Patrick K. Sheehan  
Mr. Rudy Garza  
Mr. David Jed Williams  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Mr. John C. Eichman  
Mr. Amy S. Bowen  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202



Mr. Fred W. Stumpf  
Boyer Short, A Professional Corporation  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046

on this the 31<sup>st</sup> day of December, 2013.



---

James L. Drought

## Jim Drought

---

**From:** Jim Drought  
**Sent:** Wednesday, January 08, 2014 1:14 PM  
**To:** John C. Eichman (jeichman@hunton.com)  
**Cc:** jwilliams@hsfblaw.com; David Deary (davidd@LFDlaw.com); Ian Bolden (itb@ddb-law.com); Jim Flegle; John Massopust (JMassopust@zelle.com); Matthew J. Gollinger (mgollinger@zelle.com); Michael Christian (MChristian@zelle.com); Michael Donley (michaeld@LFDlaw.com); Robert J. Rosenbach (ROSENBAR@clemens-spencer.com); spencejr@clemens-spencer.com; Tinsman Richard (rtinsman@tsslawyers.com)  
**Subject:** FW: STS

John,

Regarding Joseph Allman's deposition currently scheduled for February 14, 2014, this is to let you know that you do not have to file a motion to quash that deposition. It is our understanding that we will attempt to work out an agreement regarding the taking of his deposition and the time and place.

Regards.

Jim

James L. Drought  
Drought Drought & Bobbitt, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, TX 78205  
(210) 225-4031  
Fax: (210) 222-0586  
[jld@ddb-law.com](mailto:jld@ddb-law.com)

EXHIBIT B

## Jim Drought

---

**From:** Jim Drought  
**Sent:** Wednesday, January 08, 2014 1:25 PM  
**To:** ~~John C. Eichman~~ (jeichman@hunton.com); jwilliams@hsfblaw.com  
**Cc:** John Massopust (JMassopust@zelle.com); Michael Christian (MChristian@zelle.com)  
**Subject:** FW: STS

John,

I have conferred with co-counsel, and we do want to take Joe Allman's deposition. I had previously selected February 14, 2014 as the date, and we are willing to take his deposition in New York City. If February 14 does not work, please give me some other dates, preferably the week of February 10, 2014.

Plaintiffs' 8<sup>th</sup> Request for Production to JPM sets forth various documents concerning Mr. Allman, and a review of that request for production will give you a general idea of the subjects that we wish to discuss with Mr. Allman.

Please let me know as soon as possible whether you are willing to produce Mr. Allman for deposition.

Regarding Miriam Baum's deposition, we want to inquire about any investment and ownership JPMorgan had with Reliant Industries, Ltd. We are willing to shorten the time period of inquiry to between January 1, 2008 and the present and have her identify JPM's investment and ownership interest in Reliant as of January 1 and July 1 of each of the years in question.

We are willing to take George Glyphis, Miriam Baum, and Saju Thomas' depositions in New York City. Please confirm that those witnesses are available January 23, 2014. Further, we are willing to take Paschall Tosch's deposition in Houston. Please give me some dates during the weeks of February 3 and February 10, 2014 when Mr. Tosch can be available to be deposed.

Regards.

Jim

James L. Drought  
Drought Drought & Bobbitt, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, TX 78205  
(210) 225-4031  
Fax: (210) 222-0586  
[jld@ddb-law.com](mailto:jld@ddb-law.com)

## Jim Drought

---

**From:** Jim Drought  
**Sent:** Thursday, January 09, 2014 6:06 PM  
**To:** John C. Eichman (jeichman@hunton.com); jwilliams@hsfblaw.com  
**Cc:** John Massopust (JMassopust@zelle.com); Michael Christian (MChristian@zelle.com)  
**Subject:** STS

John, I need an answer pretty quick re the 4JPM designated witnesses and Joe Allman depositions. Can you get me that info tomorrow or Monday at the latest?

Jim

James L. Drought  
Drought Drought & Bobbitt, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, TX 78205  
(210) 225-4031  
Fax: (210) 222-0586  
[jld@ddb-law.com](mailto:jld@ddb-law.com)

## Jim Drought

---

**From:** Jim Drought  
**Sent:** Wednesday, January 15, 2014 4:49 PM  
**To:** John C. Eichman (jeichman@hunton.com)  
**Cc:** Michael Christian (MChristian@zelle.com)  
**Subject:** STS

John, any progress on the Allman depo? Also, re the Baum depo are you going to be able to get the requested info on a twice-a-year basis for the time period we discussed.

Please let me know asap.

Thanks, Jim

James L. Drought  
Drought Drought & Bobbitt, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, TX 78205  
(210) 225-4031  
Fax: (210) 222-0586  
[jld@ddb-law.com](mailto:jld@ddb-law.com)

## Jim Drought

---

**From:** Eichman, John [jeichman@hunton.com]  
**Sent:** Friday, January 17, 2014 7:13 PM  
**To:** Jim Drought  
**Cc:** MChristian@zelle.com  
**Subject:** RE: STS

Jim,

I want to get back to you on the Joe Allman deposition. At this point we don't see a reasonable basis for the plaintiffs taking Allman's deposition.

When I asked you the subject matter you wanted to explore with him you directed me to your recent discovery requests for emails or other communications between Allman and Ormond, Hayes-Davis or Smith. JPM is making an appropriate ESI search for such communications. Unless there are in fact emails that are found in that ESI, we don't see that as a basis for taking his deposition. We propose that you wait to see if any communications turn up in the ESI search before asking for his deposition.

You or one of your colleagues also mentioned the fact that Mr. Allman's team gave Petrohawk an "overweight" rating at one point in 2010. We also don't see that as a reasonable basis for taking his deposition. Can you point to anything in his group's research reports on Petrohawk that indicates that the group gave any consideration to lease terms?

In addition to our proposal that you wait to see the ESI results we also propose an alternate discovery tool—JPM will agree to answer under oath a couple of interrogatories inquiring about (a) any communications between Allman and Ormond, Hayes-Davis or Smith regarding Petrohawk; and (b) the information that Allman's group considered in giving Petrohawk an "overweight" rating in 2009.

Let us know your thoughts. Thanks.

John

John C. Eichman  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
(214) 468-3321  
(214) 740-7118 (fax)

**From:** Eichman, John  
**Sent:** Wednesday, January 15, 2014 5:42 PM  
**To:** Jim Drought  
**Cc:** Michael Christian (MChristian@zelle.com)  
**Subject:** RE: STS

Jim—

The search for documents on the stock ownership in Reliance has been underway since last week. I haven't received documents yet but I am expecting some shortly.

We have been working on the Allman issue. I expect to be able to let you know our position on him on Friday.

Mike—I presume you have gotten the documents Jed Williams produced earlier this afternoon—they are the spreadsheets, in redacted form, that are the basis of the disclosures in the equity research reports. If not, the production is attached.

John C. Eichman  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
(214) 468-3321  
(214) 740-7118 (fax)

---

**From:** Jim Drought [<mailto:jld@ddb-law.com>]  
**Sent:** Wednesday, January 15, 2014 4:49 PM  
**To:** Eichman, John  
**Cc:** Michael Christian ([MChristian@zelle.com](mailto:MChristian@zelle.com))  
**Subject:** STS

John, any progress on the Allman depo? Also, re the Baum depo are you going to be able to get the requested info on a twice-a-year basis for the time period we discussed.

Please let me know asap.

Thanks, Jim

James L. Drought  
Drought Drought & Bobbitt, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, TX 78205  
(210) 225-4031  
Fax: (210) 222-0586  
[jld@ddb-law.com](mailto:jld@ddb-law.com)

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.	§	IN THE DISTRICT COURT
	§	
VS.	§	
	§	
JPMORGAN CHASE BANK, N.A.	§	225 <sup>TH</sup> JUDICIAL DISTRICT
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES	§	BEXAR COUNTY, TEXAS

**DEFENDANTS' RENEWED MOTION TO DESIGNATE CASE AS COMPLEX**

Defendants J.P. Morgan Chase Bank, N.A., in all capacities, and Gary P. Aymes (“Defendants”) file this Renewed Motion to Designate Case as Complex pursuant to Bexar County Civil District Court Rule 4(A), B(3), and C(3) based upon the following:

**I. SUMMARY OF MOTION**

1.01

This is a complex case set for trial on March 24, 2014. Multiple, significant pretrial matters remain for decision, such as Daubert-Robinson motions and dispositive motions. In the interests of judicial economy, continuity, and efficiency, these matters (and any other issues) should be decided by the trial judge. Accordingly, Defendants move for complex case certification.

**II. BACKGROUND**

2.01

J.P. Morgan is the sole Trustee of the South Texas Syndicate Trust (the “STS Trust”). The STS Trust currently has approximately 276 beneficiaries. The



primary assets of the STS Trust are 132,000 contiguous acres of mineral interests in La Salle and McMullen Counties that produce substantial oil and gas royalty income for the STS Trust beneficiaries. J.P. Morgan has served as Trustee of the STS Trust in direct succession to Alamo National Bank who was appointed trustee by Court decree in 1951.

## 2.02

Plaintiffs are a group of 172 STS beneficiaries who allege that J.P. Morgan has breached its fiduciary duties in administration of the trust. Plaintiffs are represented by 8 different law firms.

## 2.03

Plaintiffs assert that J.P. Morgan has mismanaged the Trust in multiple ways, including the negotiation and consummation of various mineral leases, prosecution and settlement of litigation on behalf of the STS Trust, and charging fees and paying STS Trust expenses. Although Plaintiffs have not specifically pled the amount of damages they claim, Plaintiffs' expert reports allege trust damages in excess of \$450 million.

## 2.04

This case is specially set for jury trial on March 24, 2014. Trial is expected to last at least three (3) weeks. Substantial, time consuming, and complex pre-trial hearings are imminent in this case. It makes no sense to have these remaining important pretrial matters taken up in Presiding District Court by different judges rather than the trial judge for this case. Judicial efficiency, continuity and economy dictates having the trial judge hear and decide these matters.

## 2.05

Specifically, Defendants will be filing Daubert-Robinson motions to strike and/or exclude some or all of Plaintiffs' expert opinions. Plaintiffs may be filing expert motions as well. These matters will take substantial time to hear and consider. In addition, Defendants will file dispositive motions which will also take substantial time to hear and will likely involve some overlapping issues with the expert motion issues. Additionally, Defendants expect the parties to offer at trial hundreds of exhibits and many hours of testimony by video depositions. Efficiency dictates that objections to this evidence be largely heard and ruled upon prior to trial so as to not unreasonably delay the trial proceedings. Defendants further expect that both sides will file and argue extensive motions in limine and ask for various other pretrial legal rulings that will guide the trial of this case. Many of the issues will relate to and overlap with the expert motions, dispositive motions, evidentiary objections, motions in limine, and other motions. Judicial efficiency, continuity and economy dictates that the trial judge should hear and decide all these matters. This is exactly the purpose of the complex case designation provided by Rule 4.

### **III. RELIEF SOUGHT**

#### 3.01

For complex cases like the present case, Bexar County Civil District Court Rule 4C(3) provides as follows:

Complex cases: The Monitoring Judge has the discretion to remove a case from the central docket for assignment to

one judge for all further pretrial matters and trial on the merits. This decision requires a motion and hearing in Monitoring Court, even if all parties agree. If the motion is granted, the Jury Assignment Clerk and the Monitoring Judge will use a predetermined random procedure to determine which judge will preside over the case to its conclusion.

3.02

Further, the Comments to Bexar County Civil District Court Rule 4 provide as follows:

The central docket is not designed to handle those rare cases which are very complicated and require repeated pretrial hearings. In such cases, the central docket can produce inconsistent rulings, as lawyers constantly have to “reinvent the wheel” with each new judge who is assigned a hearing.

3.03

This case has remaining multiple lengthy and complex hearings, including hearings regarding dispositive motions, Daubert-Robinson motions, discovery motions and evidentiary rulings. In order to ensure continuity during the pretrial and trial phases of this matter, and to avert “reinventing the wheel” at every future hearing, this case should be designated as complex and assigned to a single judge.

3.04

Defendants previously asked for complex certification. That Motion was denied without prejudice because there were pending matters before other Judges at that time. However, there are no motions currently pending with any other court.

WHEREFORE, Defendants hereby request that the Court grant this Motion and designate this case as complex pursuant to Bexar County Civil District Court Rule 4(A), B(3), and C(3), and assigned to one judge for all further pretrial matters and trial on the merits. Defendants pray for such other and further relief to which they are justly entitled.

Respectfully submitted,

**HORNBERGER SHEEHAN FULLER  
BEITER WITTENBERG & GARZA  
INCORPORATED**

The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, Texas 78209-3266  
Telephone: 210-271-1700  
Facsimile: 210-271-1740

By: *s/ David Jed Williams*

Patrick K. Sheehan  
State Bar No. 18175500  
Email: phseehan@hsfblaw.com  
Kevin M. Beiter  
State Bar No. 02059065  
Email: kbeiter@hsfblaw.com  
Rudy A. Garza  
State Bar No. 07738200  
Email: rugar@hsfblaw.com  
David Jed Williams  
State Bar No. 21518060  
Email: jwilliams@hsfblaw.com

**HUNTON & WILLIAMS LLP**

1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
Tel.: (214) 979-3000; Fax: (214) 880-0011  
Charles A. Gall  
State Bar No. 07281500  
Email: cgall@hunton.com  
John C. Eichman

State Bar No. 06494800  
Email: jeichman@hunton.com  
Amy S. Bowen  
State Bar No. 24028216  
Email: abowen@hunton.com

**ATTORNEYS FOR DEFENDANTS**

**FIAT**

The foregoing is set for a hearing at 8:30 a.m. on January 27, 2014 in the 37<sup>th</sup> Judicial District Court. located @ 101 West Nueva, Suite 4.02

SIGNED on this \_\_\_\_ day of January 2014.

1/21/2014

---

JUDGE PRESIDING

**Michael E. Mery**

**Presiding Judge**

**37th District Court**

**Bexar County, Texas**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing DEFENDANTS' RENEWED MOTION TO DESIGNATE CASE AS COMPLEX was served on the following, as indicated, on this the 21<sup>st</sup> day of January 2014:

Mr. Steven J. Badger                      **VIA ELECTRONIC SERVICE AND/OR FAX**  
Ms. Ashley Bennett Jones  
ZELLE HOFMANN VOELBEL & MASON LLP  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975

Mr. Michael S. Christian                **VIA ELECTRONIC SERVICE AND/OR FAX**  
ZELLE HOFMANN VOELBEL & MASON LLP  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104

Mr. David R. Deary                      **VIA ELECTRONIC SERVICE AND/OR FAX**  
Mr. Jim L. Flegle  
Mr. Jeven R. Sloan  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251

Mr. James L. Drought                  **VIA ELECTRONIC SERVICE AND/OR FAX**  
DROUGHT DROUGHT & BOBBITT, LLP  
112 East Pecan, Suite 2900  
San Antonio, Texas 78205

Mr. John B. Massopust                  **VIA ELECTRONIC SERVICE AND/OR FAX**  
Mr. Matthew J. Gollinger  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152

Mr. George Spencer, Jr.                **VIA ELECTRONIC SERVICE AND/OR FAX**  
Mr. Jeffrey J. Towers  
CLEMENS & SPENCER  
112 East Pecan, Suite 1300  
San Antonio, Texas 78205

Mr. Fred W. Stumpf  
Mr. Kelly M. Walne  
GLAST, PHILLIPS & MURRAY  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046

**VIA ELECTRONIC SERVICE AND/OR FAX**

Mr. Richard Tinsman  
Ms. Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78205

**VIA ELECTRONIC SERVICE AND/OR FAX**

*s/ David Jed Williams*  
Patrick K. Sheehan  
David Jed Williams



|| SCHIRMEISTER | DIAZ-ARRASTIA | BREM LLP |



**FAX**

225th

TO: District Clerk

FIRM/COMPANY: Bexar County District Clerk

FAX NO: 210-335-0536 PHONE NO: 210-335-2662

FROM: William W. Russell DATE: January 13, 2014

ACCOUNT CODE: 593.01 TOTAL NO. OF PAGES: 14

If you do not receive all pages, please call (713) 221-2500 for assistance.

**MESSAGE:**

Please see attachment.

FILED  
DOMINA KAY MERRINNEY  
DISTRICT CLERK  
BEXAR COUNTY  
14 JAN 13 AM 10:28  
DEPUTY  
BY [Signature]

**NOTICE OF CONFIDENTIALITY**

THE INFORMATION CONTAINED IN AND TRANSMITTED WITH THIS FACSIMILE IS:

- 1. Subject to the attorney-client privilege;
- 2. Attorney work product;
- 3. Confidential

It is intended for the individual or entity designated above. You are hereby notified that any dissemination, distribution, copying, or use of or reliance upon the information contained in and transmitted with this facsimile by or to anyone other than the recipient designated above by the sender is unauthorized and strictly prohibited. If you have received this facsimile in error, please notify us by telephone at (713) 221-2500 immediately. Any facsimile erroneously transmitted to you should be immediately returned to the sender by U.S. Mail, or if authorization is granted by the sender, destroyed.

PENNZOIL PLACE - NORTH TOWER  
700 Milam, 10th Floor | Houston, Texas 77002  
713-221-2500 phone | 713-228-3510 fax  
www.sdablaw.com

Document scanned as filed.

**Fax Express Transmittal to:**

BEXAR COUNTY DISTRICT CLERK  
Fax (210) 335-0536  
VOICE (210) 335-2662

**DC Fax Express**

Requested By: William Russell Date: January 13, 2014

Firm: Schlirmeister Diaz-Arrastla Brem LLP

Address: 700 Milam Street, 10th Floor, Houston, Texas 77002

Fax No. 713-228-3510 Phone No. 713-221-2500

e-mail wrussell@sdblaw.com

**DOCUMENT INFORMATION**

Please check:  Civil  Criminal Cause No. 2010CI10977

Style: John K. Meyer VS JP Morgan Chase Bank et al

Decree/Judgment/Sentence Date of Decree/Judgment/Sentence \_\_\_\_\_

Probation Conditions  Order (Describe) \_\_\_\_\_

Other (Describe) Plaintiff's Original Petition Dated 7/2/2010

Please specify  Certified (\$1.00 per page)  Uncertified (\$1.00 per page)  
 Return via fax (Uncertified only)  Mail back  
 Return via e mail (Uncertified only)  Pick up

**DISCOVER/NOVUS ACCOUNT INFORMATION**

Cardholder's Name: Harriet Moskowitz Address: 700 Milam Street, 10th Floor, Houston, TX 77002

Account no. [REDACTED] Exp date: 05/2017

Authorized Signature: [Signature] Date January 13, 2014

Code: 7228

FOR CLERK'S USE ONLY: Total \$ \_\_\_\_\_ for certified copies \_\_\_\_\_ non-certified copies  
CLERK ASSIGNED \_\_\_\_\_

**LEGALEASE ACCOUNT INFORMATION**

Card Number: \_\_\_\_\_

Client Number: \_\_\_\_\_ Case Number: \_\_\_\_\_

Style: \_\_\_\_\_

Document: \_\_\_\_\_

Instructions Prepared By: \_\_\_\_\_

FOR CLERK'S USE ONLY: TOTALS \_\_\_\_\_ for certified copies \_\_\_\_\_ non-certified copies  
CLERK ASSIGNED \_\_\_\_\_

Thank you for using DC Fax Express. In you have questions, please call 210-335-2662

(Consolidated Under)  
NO. 2010-CI-10977

JOHN K. MEYER, ET AL.,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
JP MORGAN CHASE BANK, N.A.,	§	BEXAR COUNTY, TEXAS
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST and	§	
GARY P. AYMES,	§	
	§	
Defendants.	§	225 <sup>TH</sup> JUDICIAL DISTRICT

**ASHLEY BENNETT JONES'**  
**MOTION TO WITHDRAW**

Ashley Bennett Jones, formerly of the law firm Zelle Hofmann Voelbel & Mason LLP, hereby files this Motion to Withdraw and in support thereof would show as follows:

Plaintiff-Intervenors are represented by three other attorneys from the law firm of Zelle Hofmann Voelbel & Mason LLP, and Ashley Bennett Jones is no longer with Zelle Hofmann Voelbel & Mason LLP. She has not worked on the file in several months. The withdrawal is not for delay and will not affect the current pretrial deadlines or trial setting.

For these reasons, Ashley Bennett Jones asks the Court to grant her motion to withdraw.

Respectfully submitted,

**ZELLE HOFMANN VOELBEL & MASON LLP**

By:       /s/ Steven J. Badger        
John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
500 Washington Avenue South, Suite 5000  
Minneapolis, MN 55415  
Telephone: 612-339-2020  
Facsimile: 612-336-9100

Steven J. Badger  
Texas State Bar No. 01499050  
Ashley Bennett Jones  
Texas State Bar No. 24056877  
901 Main Street, Suite 4000  
Dallas, TX 75202-3975  
Telephone: 214-742-3000  
Facsimile: 214-760-8994

**ATTORNEYS FOR PLAINTIFF-INTERVENORS**

**CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that a true and correct copy of the foregoing has been served on the 15th day of January, 2014, in accordance with the TEXAS RULES OF CIVIL PROCEDURE as follows:

Richard Tinsman  
Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, TX 78205  
Telephone: 210-225-3121  
Facsimile: 210-225-6235  
**Attorneys for Plaintiffs John K. Meyer, John K. Meyer, Jr., and Theodore F. Meyer**

Charles “Boxy” Hornberger  
Mark A. Randolph  
Patrick K. Sheehan  
David Jed Williams  
HORNBERGER SHEEHAN FULLER  
& BEITER, INC.  
The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, TX 78209  
Telephone: 210-271-1700  
Facsimile: 210-271-1730  
**Attorneys for Defendants JP Morgan and Gary Aymes**

James L. Drought  
DROUGHT, DROUGHT  
& BOBBITT, LLP  
112 E. Pecan Street, Suite 2900  
San Antonio, TX 78205  
Telephone: 210-225-4031  
Facsimile: 210-222-0586  
**Attorneys for Plaintiffs John K.  
Meyer, John K. Meyer, Jr., and  
Theodore F. Meyer**

George H. Spencer, Jr.  
Jeffrey J. Towers  
CLEMENS & SPENCER, P.C.  
112 E. Pecan Street, Suite 1300  
San Antonio, TX 78205  
Telephone: 210-227-7121  
Facsimile: 210-227-0732  
**Attorneys for Plaintiffs John K.  
Meyer, John K. Meyer, Jr., and  
Theodore F. Meyer**

David R. Dreary  
Jim L. Flegle  
Michael J. Donley  
LOEWINSOHN, FLEGLE, DREARY,  
L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, TX 75251  
Telephone: 214-572-1700  
Facsimile: 214-572-1717  
**Attorneys for Plaintiff Emilie  
Blaze**

Mark T. Josephs  
Sara Hollan Chelette  
JACKSON WALKER L.L.P.  
901 Main Street, Suite 6000  
Dallas, TX 75202  
Telephone: 214-953-6000  
Facsimile: 214-953-5822  
**Attorneys for Defendant J.P.  
Morgan Chase Bank, N.A.,  
Trustee of the South Texas  
Syndicate Trust**

*/s/ Steven J. Badger*  
\_\_\_\_\_  
Steven J. Badger

(Consolidated Under)  
NO. 2010-CI-10977

JOHN K. MEYER, ET AL.,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
JP MORGAN CHASE BANK, N.A.,	§	BEXAR COUNTY, TEXAS
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST and	§	
GARY P. AYMES,	§	
	§	
Defendants.	§	225 <sup>TH</sup> JUDICIAL DISTRICT

**ORDER GRANTING ASHLEY BENNETT JONES'  
MOTION TO WITHDRAW**

After considering Ashley Bennett Jones' Motion to Withdraw, the Court hereby  
GRANTS the Motion. Ashley Bennett Jones is hereby removed as counsel of record for  
Plaintiff.

Signed on \_\_\_\_\_, 2014.

\_\_\_\_\_  
JUDGE PRESIDING



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CAUSE NO. 2010-CI-10977

JOHN K. MEYER ) IN THE DISTRICT COURT  
)  
VS. )  
)  
JP MORGAN CHASE BANK, N.A., ) 225TH JUDICIAL DISTRICT  
INDIVIDUALLY/CORPORATELY AND )  
AS TRUSTEE OF THE SOUTH TEXAS )  
SYNDICATE TRUST AND GARY P. )  
AYMES ) BEXAR COUNTY, TEXAS

*CRT*

BY Joanna Martinez  
DEPUTY CLERK

14 JAN 31 AM 11:32

FILED  
DONNA KAY MCKINNEY  
DISTRICT CLERK  
BEXAR COUNTY

REPORTER'S CERTIFICATION  
ORAL AND VIDEOTAPED DEPOSITION OF  
CATHERINE HILGARTNER MASUCCI  
DECEMBER 6, 2013

I, JOANNA M. MARTINEZ, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, CATHERINE HILGARTNER MASUCCI, was duly sworn by the officer and that the transcript of the ORAL AND VIDEOTAPED DEPOSITION is a true record of the testimony given by the witness;

That the deposition transcript was submitted on 12-20-13 to the attorney for the witness for examination, signature, and return to me by 1-09-14;

That the amount of time used by each party at the deposition is as follows:

Mr. Patrick K. Sheehan - 5 Hours: 29 Minutes

That pursuant to information given to the deposition officer at the time said testimony was taken, the following includes counsel for all parties of record:

FOR THE PLAINTIFFS, JOHN K. MEYER, JOHN MEYER, JR., THEODORE MEYER:

Mr. Robert J. Rosenbach

FOR THE PLAINTIFF INTERVENORS:

Mr. Matthew J. Gollinger

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

FOR THE DEFENDANT, J.P. MORGAN CHASE BANK, N.A.  
INDIVIDUALLY AND CORPORATELY AND AS TRUSTEE OF THE STS  
TRUST:

Mr. Patrick K. Sheehan  
Ms. Stephanie L. Curette

I further certify that I am neither counsel for,  
related to, nor employed by any of the parties or  
attorneys in the action in which this proceeding was  
taken, and further that I am not financially or  
otherwise interested in the outcome of the action.

Further certification requirements pursuant to Rule  
203 of TRCP will be certified to after they have  
occurred.

Certified to by me this 17th day of December, 2013.



JOANNA M. MARTINEZ, CSR, RPR, RMR  
Texas CSR 3574  
Expiration date: 12/31/14

Kim Tindall & Associates, Inc.  
Firm Registration No. 631  
645 Lockhill Selma, Suite 200  
San Antonio, Texas 78216  
(210) 697-3400



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

CAUSE NO. 2010-CI-10977

JOHN K. MEYER ) IN THE DISTRICT COURT  
)  
VS. )  
)  
JP MORGAN CHASE BANK, N.A., ) 225TH JUDICIAL DISTRICT  
INDIVIDUALLY/CORPORATELY AND )  
AS TRUSTEE OF THE SOUTH TEXAS )  
SYNDICATE TRUST AND GARY P. )  
AYMES ) BEXAR COUNTY, TEXAS

FURTHER CERTIFICATION UNDER RULE 203 TRCP  
ORAL AND VIDEOTAPED DEPOSITION OF  
CATHERINE HILGARTNER MASUCCI  
DECEMBER 6, 2013

The original deposition was ~~was not~~ returned to  
the deposition officer on 1-09-14;

If returned, the attached Changes and Signature page  
contains any changes and the reasons therefor;

If returned, the original deposition was delivered  
to MR. PATRICK K. SHEEHAN, Custodial Attorney;

That \$ 1678.40 is the deposition officer's  
charges to the Defendants for preparing the original  
deposition transcript and any copies of exhibits;

That the deposition was delivered in accordance with  
Rule 203.3, and that a copy of this certificate was  
served on all parties shown herein and filed with the  
Clerk.

Certified to by me this 23rd day of Jan,  
2014.

Joanna M. Martinez BY BW  
JOANNA M. MARTINEZ, CSR, RPR, RMR  
Texas CSR 3574  
Expiration date: 12/31/14

Kim Tindall & Associates, Inc.  
Firm Registration No. 631  
645 Lockhill Selma, Suite 200  
San Antonio, Texas 78216  
(210) 697-3400



CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.

§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

VS.

225<sup>TH</sup> JUDICIAL DISTRICT

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

BEXAR COUNTY, TEXAS

SUBPOENA

*CRJ*

BY *Donna Kay McKinney*  
DEPUTY  
2014 JAN 30 PM 2:27

FILED  
DONNA KAY MCKINNEY  
DISTRICT CLERK  
BEXAR COUNTY

TO: Frost National Bank  
c/o Stan McCormick, Registered Agent  
100 West Houston St.  
San Antonio, Texas 78205

YOU ARE HEREBY COMMANDED at the instance of Defendant, JPMorgan Chase Bank, N.A. ("JPMC"), to produce at the place, date, and time specified below, or at a mutually agreeable time and place the documents in your possession, custody, or control as described in the attached Exhibit "A." This subpoena does not request that you appear, only that you produce the documents described in the attached pages. Defendant JPMC will reimburse you for the reasonable costs of production pursuant to the Texas Rules of Civil Procedure as well as Texas Finance Code § 59.006, to the extent applicable. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

PLACE:

DATE AND TIME:

**HORNBERGER SHEEHAN FULLER  
BEITER WITTENBERG & GARZA**  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
Tel: 210-271-1700  
Fax: 210-271-1740

Monday, February 24, 2014 @ 10:00 a.m.

**AFFIDAVIT  
ATTACHED**

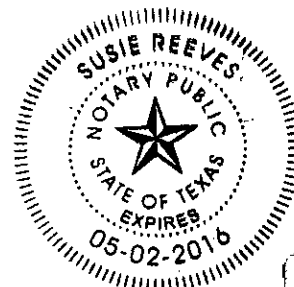
*David Ted Williams*

David Ted Williams  
HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
Tel: 210-271-1700

ATTORNEYS FOR DEFENDANTS

WITNESS MY HAND AND SEAL  
this *14* day of January, 2014

*Susie Reeves*  
Notary Public, State of Texas



Document  
scanned as filed.

**RETURN**

Cause No. 2010-CI-10977

Came to hand on the 27th day of January, 2014 at 4:30 p.m.

- SUBPOENA
- NOTICE OF SUBPOENA OF BROADWAY NATIONAL BANK
- CONSENT TO SUBPOENA OF BROADWAY NATIONAL BANK

Executed at 100 W Houston St., San Antonio, Texas 78205 within the County of Bexar, on the 28th day of January, 2014, at 11:10 a. m., by delivering to the within named Frost National Bank, by delivering to its Registered Agent, Stan McCormick, a true and correct copy of the above specified civil process.

I am over eighteen (18) years of age and not a party to or interested in the outcome of the above numbered cause. I am authorized to serve citations and other notices in this cause by Texas Supreme Court Order #SCH2243, exp. 8/31/2015. This return is attached to original process or a true copy thereof. The statements and facts herein contained are within my personal knowledge and are true and correct.

My name is Michael Gibson McEwen. My date of birth is 1-23-47 and my address is P.O. Box 691675, San Antonio, Texas 78269. I declare under penalty of perjury that the foregoing is true.

Mike McEwen

Printed Name of Process Server



\_\_\_\_\_  
Signature of Process Server  
MGM & Associates

## **EXHIBIT A**

### **DEFINITIONS**

1. "Frost Bank" shall refer to Frost National Bank and shall include any past and present officers, directors, shareholders, affiliates, subsidiaries, agents, representatives, employees, servants, and all persons acting directly or indirectly on its behalf.

2. "Stanley Morton Trust Lease" shall refer to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009, and shall include any drafts, memoranda, or agreements related thereto.

3. "Stanley Morton Trust" shall refer to the trust that is a party to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009.

4. "The Property" shall refer to that certain 37,000 acres of land situated in LaSalle and McMullen Counties, Texas, the minerals of which were the subject of oil and gas leases entered into between EOG and the B. Naylor Morton Trust, the Stanley A. Morton Trust, and Douglas R. Semmes, Jr., Mary Elizabeth Semmes Waller, and Margaret Ann Semmes Stavropoulos in July and August 2009.

5. "Person" shall refer to any individual, partnership, association, corporation, joint venture, firm, proprietorship, agency, board, authority, commission, or other legal or business entity.

6. "Communication" shall refer to every disclosure, transfer or exchange of information, whether orally or in writing and whether in person, by telephone, by telegram, by air courier, by mail, by personal delivery or in any other manner or method.

7. "Relate," "Relating," or "Related" shall refer to anything that relates, refers, reflects, regards, indicates, shows, displays, demonstrates, evidences, supports, constitutes, composes, describes, explains or pertains the matter referred to.

8. "Document" shall refer to any written or recorded material without limitation, whether typed, handwritten, printed or otherwise, or any photograph, photostat, microfilm, tape recording or other reproduction thereof, including, without limitation, each note, memorandum, work paper, letter, telegram, e-mail, telex, circular, release, article, wire transmission, report, prospectus, memorandum of telephone or personal conversation, either in writing or upon any mechanical, electrical or electronic recording device, any analysis, chart, account, book, draft, summary, diary, transcript, agreement, contract, order, tape, computer diskettes, and other data compilation from which information can be obtained or translated through detection devices into reasonable usable form when translation is practicably necessary, including the original and any non-identical copy (whether different from the original because of handwritten notes, or underlining on the copy or otherwise). Pursuant to Texas Rule of Civil Procedure 196.4, the term "Document" includes data or information that exists in electronic or magnetic form and Bank of America hereby specifies that such data or information shall be produced in its original format together with any hard copy or printed version that exists.

9. As used herein, the term "and" means "and/or."

10. As used herein, the term "or" means "or/and."

#### **DOCUMENTS REQUESTED**

1. A copy of the Stanley Morton Trust Lease.
2. A copy of Frost Bank's lease file pertaining to the Stanley Morton Trust Lease.
3. All letter agreements relating to the Stanley Morton Trust Lease.
4. All documents setting forth the terms, including bonus consideration and royalty percentage for the Stanley Morton Trust Lease.

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.	§	IN THE DISTRICT COURT
	§	
VS.	§	
	§	
JPMORGAN CHASE BANK, N.A.	§	225 <sup>TH</sup> JUDICIAL DISTRICT
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES	§	BEXAR COUNTY, TEXAS

**NOTICE OF SUBPOENA OF FROST NATIONAL BANK**

TO: Plaintiffs, c/o John B. Massopust, Zelle Hofmann Voelbel & Mason LLP, 500 Washington Avenue South, Suite 4000, Minneapolis, Minnesota 55415; Jim Flegle, Loewinsohn Flegle Deary, L.L.P., 12377 Merit Drive, Suite 900, Dallas, Texas 75251; Richard Tinsman, Tinsman & Sciano, Inc., 10107 McAllister Freeway, San Antonio, Texas 78216; George H. Spencer, Jr., Clemens & Spencer, P.C., 112 East Pecan Street, Suite 1300, San Antonio, Texas 78205; and James L. Drought, Drought, Drought & Bobbitt, LLP, 2900 Weston Centre, 122 East Pecan Street, San Antonio, Texas 78205.

TO: Frost National Bank, as Trustee of the Stanley A. Morton Trust, c/o Stan McCormick, Registered Agent, 100 West Houston Street, San Antonio, Texas 78205.

**PLEASE TAKE NOTICE** that, pursuant to the Texas Rules of Civil Procedure, Defendant JPMorgan Chase Bank, N.A. ("JPMC") intends to subpoena records from Broadway National Bank relevant to the above-styled action by Plaintiffs. The documents to be produced are described in the proposed subpoena ("Subpoena") and Exhibit A, attached hereto. The documents must be produced pursuant to the Subpoena on or before Monday, February 24, 2014, at 10:00 a.m. at the offices of HORNBERGER SHEEHAN FULLER BEITER WITTENBERG & GARZA, 7373 Broadway, Suite 300, San Antonio, Texas 78209. Further, JPMC will pay Frost National Bank's reasonable costs of complying with the Subpoena pursuant to Section 59.006 of the Texas Finance Code and the Texas Rules of Civil Procedure.

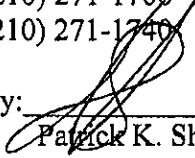
As a customer of Frost National Bank, the Stanley A. Morton Trust may seek an appropriate remedy from the 225<sup>th</sup> Judicial District Court with regard to the Subpoena, including filing a motion to quash the Subpoena or a motion for protective order.

Respectfully Submitted,

**HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED**

7373 Broadway, Suite 300  
San Antonio, Texas 78209  
(210) 271-1700 Telephone  
(210) 271-1740 Fax

By: \_\_\_\_\_

  
Patrick K. Sheehan  
State Bar No. 18175500  
Kevin M. Beiter  
State Bar No. 02059065  
Rudy A. Garza  
State Bar No. 07738200  
David Jed Williams  
State Bar No. 21518060

- and-

**HUNTON & WILLIAMS LLP**

1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
(214) 979-3000 - Telephone  
(214) 880-0011 - Facsimile  
Charles A. Gall  
State Bar No. 07281500  
John C. Eichman  
State Bar No. 06494800  
Amy S. Bowen  
State Bar No. 24028216

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document was served upon the following on January 17, 2014 by the method indicated:

Mr. James L. Drought  
Ian T. Bolden  
DROUGHT DROUGHT & BOBBITT, LLP  
112 East Pecan, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)  
[itb@ddb-law.com](mailto:itb@ddb-law.com)

**VIA EMAIL**

Mr. George Spencer, Jr.  
Mr. Robert Rosenbach  
CLEMENS & SPENCER  
112 East Pecan, Suite 1300  
San Antonio, Texas 78205  
[spencer@clemens-spencer.com](mailto:spencer@clemens-spencer.com)  
[rosenbar@clemens-spencer.com](mailto:rosenbar@clemens-spencer.com)

**VIA EMAIL**

Mr. Richard Tinsman  
Ms. Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78205  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

**VIA EMAIL**

Mr. John B. Massopust  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)

**VIA EMAIL**

Mr. Steven J. Badger  
ZELLE HOFMANN VOELBEL & MASON LLP  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zelle.com](mailto:sbadger@zelle.com)

**VIA EMAIL**

Mr. David R. Deary  
Mr. Jim L. Flegle  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)

**VIA EMAIL**



[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)

Mr. Michael S. Christian  
ZELLE HOFMANN VOELBEL & MASON  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

**VIA EMAIL**

Mr. Fred W. Stumpf  
Glast, Phillips & Murray  
Nine Greenway Plaza  
Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

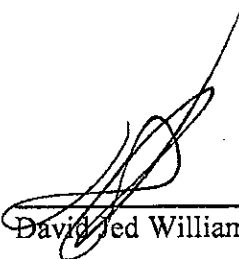
**VIA EMAIL**

David M. Prichard  
Kevin M. Young  
Prichard Hawkins McFarland & Young  
10101 Reunion Place, Suite 600  
San Antonio, Texas 78216  
[dprichard@phmy.com](mailto:dprichard@phmy.com)  
[kyoung@phmy.com](mailto:kyoung@phmy.com)

**VIA EMAIL**

Mr. Alan V. Ytterberg  
Mr. J. Graham Kenney  
Ytterberg Deery Knull LLP  
3555 Timmons Lane, Suite 1000  
Houston, Texas 77027-6495  
[aytterberg@ydklaw.com](mailto:aytterberg@ydklaw.com)  
[gkenney@ydklaw.com](mailto:gkenney@ydklaw.com)

**VIA EMAIL**

  
\_\_\_\_\_  
David Ted Williams

## **EXHIBIT A**

### **DEFINITIONS**

1. "Frost Bank" shall refer to Frost National Bank and shall include any past and present officers, directors, shareholders, affiliates, subsidiaries, agents, representatives, employees, servants, and all persons acting directly or indirectly on its behalf.

2. "Stanley Morton Trust Lease" shall refer to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009, and shall include any drafts, memoranda, or agreements related thereto.

3. "Stanley Morton Trust" shall refer to the trust that is a party to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009.

4. "The Property" shall refer to that certain 37,000 acres of land situated in LaSalle and McMullen Counties, Texas, the minerals of which were the subject of oil and gas leases entered into between EOG and the B. Naylor Morton Trust, the Stanley A. Morton Trust, and Douglas R. Semmes, Jr., Mary Elizabeth Semmes Waller, and Margaret Ann Semmes Stavropoulos in July and August 2009.

5. "Person" shall refer to any individual, partnership, association, corporation, joint venture, firm, proprietorship, agency, board, authority, commission, or other legal or business entity.

6. "Communication" shall refer to every disclosure, transfer or exchange of information, whether orally or in writing and whether in person, by telephone, by telegram, by air courier, by mail, by personal delivery or in any other manner or method.

7. "Relate," "Relating," or "Related" shall refer to anything that relates, refers, reflects, regards, indicates, shows, displays, demonstrates, evidences, supports, constitutes, composes, describes, explains or pertains the matter referred to.

8. "Document" shall refer to any written or recorded material without limitation, whether typed, handwritten, printed or otherwise, or any photograph, photostat, microfilm, tape recording or other reproduction thereof, including, without limitation, each note, memorandum, work paper, letter, telegram, e-mail, telex, circular, release, article, wire transmission, report, prospectus, memorandum of telephone or personal conversation, either in writing or upon any mechanical, electrical or electronic recording device, any analysis, chart, account, book, draft, summary, diary, transcript, agreement, contract, order, tape, computer diskettes, and other data compilation from which information can be obtained or translated through detection devices into reasonable usable form when translation is practicably necessary, including the original and any non-identical copy (whether different from the original because of handwritten notes, or underlining on the copy or otherwise). Pursuant to Texas Rule of Civil Procedure 196.4, the term "Document" includes data or information that exists in electronic or magnetic form and Bank of America hereby specifies that such data or information shall be produced in its original format together with any hard copy or printed version that exists.

9. As used herein, the term "and" means "and/or."

10. As used herein, the term "or" means "or/and."

#### **DOCUMENTS REQUESTED**

1. A copy of the Stanley Morton Trust Lease.
2. A copy of Frost Bank's lease file pertaining to the Stanley Morton Trust Lease.
3. All letter agreements relating to the Stanley Morton Trust Lease.
4. All documents setting forth the terms, including bonus consideration and royalty percentage for the Stanley Morton Trust Lease.

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.

§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

VS.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

225<sup>TH</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**CONSENT TO SUBPOENA OF FROST NATIONAL BANK**

Frost National Bank, as trustee of the Stanley A. Morton Trust, hereby consents to the subpoena issued by JP Morgan Chase Bank, N.A., attached hereto.

\_\_\_\_\_  
Stanley A. Morton Trust  
Frost National Bank, Trustee

By: \_\_\_\_\_

Date: \_\_\_\_\_



CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.

§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

VS.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

225<sup>TH</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

SUBPOENA

TO: Broadway National Bank  
c/o Don Krause, Registered Agent  
8626 Tesoro Dr., Ste. 500  
San Antonio, Texas 78217-6233

*CRD*

FILED  
DONNA KAY MCKINNEY  
DISTRICT CLERK  
BEXAR COUNTY  
2014 JAN 30 PM 2:27  
DEPUTY  
By *Donna Kay McKinney*

YOU ARE HEREBY COMMANDED at the instance of Defendant, JPMorgan Chase Bank, N.A. ("JPMC"), to produce at the place, date, and time specified below, or at a mutually agreeable time and place the documents in your possession, custody, or control as described in the attached **Exhibit "A."** This subpoena does not request that you appear, only that you produce the documents described in the attached pages. Defendant JPMC will reimburse you for the reasonable costs of production pursuant to the Texas Rules of Civil Procedure as well as Texas Finance Code § 59.006, to the extent applicable. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

PLACE:

**HORNBERGER SHEEHAN FULLER  
BEITER WITTENBERG & GARZA**  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
Tel: 210-271-1700  
Fax: 210-271-1740

DATE AND TIME:

Monday, February 24, 2014 @ 10:00 a.m.

**AFFIDAVIT  
ATTACHED**

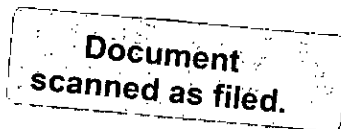
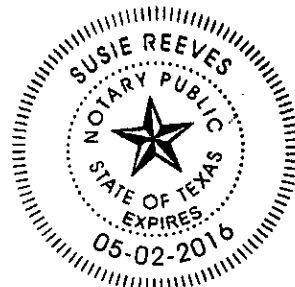
*David Lee Williams*

David Lee Williams  
HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
Tel: 210-271-1700

ATTORNEYS FOR DEFENDANTS

WITNESS MY HAND AND SEAL  
this *27th* day of January, 2014

*Susie Reeves*  
Notary Public, State of Texas



**RETURN**

Cause No. 2010-CI-10977

Came to hand on the 27th day of January, 2014 at 4:30 p.m.

- SUBPOENA
- NOTICE OF SUBPOENA OF BROADWAY NATIONAL BANK
- CONSENT TO SUBPOENA OF BROADWAY NATIONAL BANK

Executed at 1177 N E Loop 410, San Antonio, Texas 78209 within the County of Bexar, on the 27th day of January, 2014, at 5:15 p. m., by delivering to the within named Broadway National Bank, by delivering to its Registered Agent, Don Krause, a true and correct copy of the above specified civil process.

I am over eighteen (18) years of age and not a party to or interested in the outcome of the above numbered cause. I am authorized to serve citations and other notices in this cause by Texas Supreme Court Order #SCH2243, exp. 8/31/2015. This return is attached to original process or a true copy thereof. The statements and facts herein contained are within my personal knowledge and are true and correct.

My name is Michael Gibson McEwen. My date of birth is 1-23-47 and my address is P.O. Box 691675, San Antonio, Texas 78269. I declare under penalty of perjury that the foregoing is true.

Mike McEwen

Printed Name of Process Server



\_\_\_\_\_  
Signature of Process Server

MGM & Associates

## **EXHIBIT A**

### **DEFINITIONS**

1. "Broadway Bank" shall refer to Broadway National Bank and shall include any past and present officers, directors, shareholders, affiliates, subsidiaries, agents, representatives, employees, servants, and all persons acting directly or indirectly on its behalf.

2. "Stanley Morton Trust Lease" shall refer to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009, and shall include any drafts, memoranda, or agreements related thereto.

3. "Stanley Morton Trust" shall refer to the trust that is a party to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009.

4. "The Property" shall refer to that certain 37,000 acres of land situated in LaSalle and McMullen Counties, Texas, the minerals of which were the subject of oil and gas leases entered into between EOG and the B. Naylor Morton Trust, the Stanley A. Morton Trust, and Douglas R. Semmes, Jr., Mary Elizabeth Semmes Waller, and Margaret Ann Semmes Stavropoulos in July and August 2009.

5. "Person" shall refer to any individual, partnership, association, corporation, joint venture, firm, proprietorship, agency, board, authority, commission, or other legal or business entity.

6. "Communication" shall refer to every disclosure, transfer or exchange of information, whether orally or in writing and whether in person, by telephone, by telegram, by air courier, by mail, by personal delivery or in any other manner or method.

7. "Relate," "Relating," or "Related" shall refer to anything that relates, refers, reflects, regards, indicates, shows, displays, demonstrates, evidences, supports, constitutes, composes, describes, explains or pertains the matter referred to.

8. "Document" shall refer to any written or recorded material without limitation, whether typed, handwritten, printed or otherwise, or any photograph, photostat, microfilm, tape recording or other reproduction thereof, including, without limitation, each note, memorandum, work paper, letter, telegram, e-mail, telex, circular, release, article, wire transmission, report, prospectus, memorandum of telephone or personal conversation, either in writing or upon any mechanical, electrical or electronic recording device, any analysis, chart, account, book, draft, summary, diary, transcript, agreement, contract, order, tape, computer diskettes, and other data compilation from which information can be obtained or translated through detection devices into reasonable usable form when translation is practicably necessary, including the original and any non-identical copy (whether different from the original because of handwritten notes, or underlining on the copy or otherwise). Pursuant to Texas Rule of Civil Procedure 196.4, the term "Document" includes data or information that exists in electronic or magnetic form and Bank of America hereby specifies that such data or information shall be produced in its original format together with any hard copy or printed version that exists.

9. As used herein, the term "and" means "and/or."

10. As used herein, the term "or" means "or/and."

#### **DOCUMENTS REQUESTED**

1. A copy of the Stanley Morton Trust Lease.
2. A copy of Broadway Bank's lease file pertaining to the Stanley Morton Trust Lease.
3. All letter agreements relating to the Stanley Morton Trust Lease.
4. All documents setting forth the terms, including bonus consideration and royalty percentage for the Stanley Morton Trust Lease.



CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.	§	IN THE DISTRICT COURT
VS.	§	
JPMORGAN CHASE BANK, N.A.	§	225 <sup>TH</sup> JUDICIAL DISTRICT
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES	§	BEXAR COUNTY, TEXAS

**NOTICE OF SUBPOENA OF BROADWAY NATIONAL BANK**

- TO: Plaintiffs, c/o John B. Massopust, Zelle Hofmann Voelbel & Mason LLP, 500 Washington Avenue South, Suite 4000, Minneapolis, Minnesota 55415; Jim Flegle, Loewinsohn Flegle Deary, L.L.P., 12377 Merit Drive, Suite 900, Dallas, Texas 75251; Richard Tinsman, Tinsman & Sciano, Inc., 10107 McAllister Freeway, San Antonio, Texas 78216; George H. Spencer, Jr., Clemens & Spencer, P.C., 112 East Pecan Street, Suite 1300, San Antonio, Texas 78205; and James L. Drought, Drought, Drought & Bobbitt, LLP, 2900 Weston Centre, 122 East Pecan Street, San Antonio, Texas 78205.
- TO: Broadway National Bank, c/o Don Krause, Registered Agent, 8626 Tesoro Dr., Ste. 500, San Antonio, Texas 78217-6233
- TO: Frost National Bank, as Trustee of the Stanley A. Morton Trust, c/o Stan McCormick, Registered Agent, 100 West Houston Street, San Antonio, Texas 78205.

**PLEASE TAKE NOTICE** that, pursuant to the Texas Rules of Civil Procedure, Defendant JPMorgan Chase Bank, N.A. ("JPMC") intends to subpoena records from Broadway National Bank relevant to the above-styled action by Plaintiffs. The documents to be produced are described in the proposed subpoena ("Subpoena") and Exhibit A, attached hereto. The documents must be produced pursuant to the Subpoena on or before Monday, February 24, 2014, at 10:00 a.m. at the offices of HORNBERGER SHEEHAN FULLER BEITER WITTENBERG & GARZA, 7373 Broadway, Suite 300, San Antonio, Texas 78209. Further, JPMC will pay Broadway National Bank's reasonable costs of complying with the Subpoena pursuant to Section 59.006 of the Texas Finance Code and the Texas Rules of Civil Procedure.

As a customer of Broadway National Bank, the Stanley A. Morton Trust may seek an appropriate remedy from the 225<sup>th</sup> Judicial District Court with regard to the Subpoena, including filing a motion to quash the Subpoena or a motion for protective order.

Respectfully Submitted,

**HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED**

7373 Broadway, Suite 300  
San Antonio, Texas 78209  
(210) 271-1700 Telephone  
(210) 271-1740 Fax

By: \_\_\_\_\_

Patrick K. Sheehan  
State Bar No. 18175500  
Kevin M. Beiter  
State Bar No. 02059065  
Rudy A. Garza  
State Bar No. 07738200  
David Jed Williams  
State Bar No. 21518060

- and-

**HUNTON & WILLIAMS LLP**

1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
(214) 979-3000 - Telephone  
(214) 880-0011 - Facsimile  
Charles A. Gall  
State Bar No. 07281500  
John C. Eichman  
State Bar No. 06494800  
Amy S. Bowen  
State Bar No. 24028216

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document was served upon the following on January 17, 2014 by the method indicated:

Mr. James L. Drought  
Ian T. Bolden  
DROUGHT DROUGHT & BOBBITT, LLP  
112 East Pecan, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)  
[itb@ddb-law.com](mailto:itb@ddb-law.com)

**VIA EMAIL**

Mr. George Spencer, Jr.  
Mr. Robert Rosenbach  
CLEMENS & SPENCER  
112 East Pecan, Suite 1300  
San Antonio, Texas 78205  
[spencer@clemens-spencer.com](mailto:spencer@clemens-spencer.com)  
[rosenbar@clemens-spencer.com](mailto:rosenbar@clemens-spencer.com)

**VIA EMAIL**

Mr. Richard Tinsman  
Ms. Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78205  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

**VIA EMAIL**

Mr. John B. Massopust  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)

**VIA EMAIL**

Mr. Steven J. Badger  
ZELLE HOFMANN VOELBEL & MASON LLP  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zelle.com](mailto:sbadger@zelle.com)

**VIA EMAIL**

Mr. David R. Deary  
Mr. Jim L. Flegle  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)

**VIA EMAIL**

[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)

Mr. Michael S. Christian  
ZELLE HOFMANN VOELBEL & MASON  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

**VIA EMAIL**

Mr. Fred W. Stumpf  
Glast, Phillips & Murray  
Nine Greenway Plaza  
Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

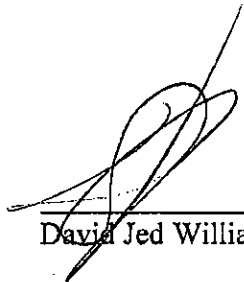
**VIA EMAIL**

David M. Prichard  
Kevin M. Young  
Prichard Hawkins McFarland & Young  
10101 Reunion Place, Suite 600  
San Antonio, Texas 78216  
[dprichard@phmy.com](mailto:dprichard@phmy.com)  
[kyoung@phmy.com](mailto:kyoung@phmy.com)

**VIA EMAIL**

Mr. Alan V. Ytterberg  
Mr. J. Graham Kenney  
Ytterberg Deery Knull LLP  
3555 Timmons Lane, Suite 1000  
Houston, Texas 77027-6495  
[aytterberg@ydklaw.com](mailto:aytterberg@ydklaw.com)  
[gkenney@ydklaw.com](mailto:gkenney@ydklaw.com)

**VIA EMAIL**



---

David Jed Williams

## **EXHIBIT A**

### **DEFINITIONS**

1. "Broadway Bank" shall refer to Broadway National Bank and shall include any past and present officers, directors, shareholders, affiliates, subsidiaries, agents, representatives, employees, servants, and all persons acting directly or indirectly on its behalf.

2. "Stanley Morton Trust Lease" shall refer to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009, and shall include any drafts, memoranda, or agreements related thereto.

3. "Stanley Morton Trust" shall refer to the trust that is a party to the oil and gas lease executed between Broadway Bank, as trustee of the Stanley A. Morton Trust, and EOG dated July 20, 2009.

4. "The Property" shall refer to that certain 37,000 acres of land situated in LaSalle and McMullen Counties, Texas, the minerals of which were the subject of oil and gas leases entered into between EOG and the B. Naylor Morton Trust, the Stanley A. Morton Trust, and Douglas R. Semmes, Jr., Mary Elizabeth Semmes Waller, and Margaret Ann Semmes Stavropoulos in July and August 2009.

5. "Person" shall refer to any individual, partnership, association, corporation, joint venture, firm, proprietorship, agency, board, authority, commission, or other legal or business entity.

6. "Communication" shall refer to every disclosure, transfer or exchange of information, whether orally or in writing and whether in person, by telephone, by telegram, by air courier, by mail, by personal delivery or in any other manner or method.

7. "Relate," "Relating," or "Related" shall refer to anything that relates, refers, reflects, regards, indicates, shows, displays, demonstrates, evidences, supports, constitutes, composes, describes, explains or pertains the matter referred to.

8. "Document" shall refer to any written or recorded material without limitation, whether typed, handwritten, printed or otherwise, or any photograph, photostat, microfilm, tape recording or other reproduction thereof, including, without limitation, each note, memorandum, work paper, letter, telegram, e-mail, telex, circular, release, article, wire transmission, report, prospectus, memorandum of telephone or personal conversation, either in writing or upon any mechanical, electrical or electronic recording device, any analysis, chart, account, book, draft, summary, diary, transcript, agreement, contract, order, tape, computer diskettes, and other data compilation from which information can be obtained or translated through detection devices into reasonable usable form when translation is practicably necessary, including the original and any non-identical copy (whether different from the original because of handwritten notes, or underlining on the copy or otherwise). Pursuant to Texas Rule of Civil Procedure 196.4, the term "Document" includes data or information that exists in electronic or magnetic form and Bank of America hereby specifies that such data or information shall be produced in its original format together with any hard copy or printed version that exists.

9. As used herein, the term "and" means "and/or."

10. As used herein, the term "or" means "or/and."

#### **DOCUMENTS REQUESTED**

1. A copy of the Stanley Morton Trust Lease.
2. A copy of Broadway Bank's lease file pertaining to the Stanley Morton Trust Lease.
3. All letter agreements relating to the Stanley Morton Trust Lease.
4. All documents setting forth the terms, including bonus consideration and royalty percentage for the Stanley Morton Trust Lease.

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.

§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

VS.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

225<sup>TH</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**CONSENT TO SUBPOENA OF BROADWAY NATIONAL BANK**

Broadway National Bank, as trustee of the Stanley A. Morton Trust, hereby consents to the subpoena issued by JP Morgan Chase Bank, N.A., attached hereto.

\_\_\_\_\_  
Stanley A. Morton Trust  
Broadway National Bank, Trustee

By: \_\_\_\_\_  
Date: \_\_\_\_\_

225th District Court of BEXAR County, Texas

Bexar County District Clerk 100 DOLOROSA ST #200 SAN ANTONIO TX 78205

Case #: 2010-CI-10977

Accepted By: Maria Jackson

JOHN K. MEYER, ET AL

Plaintiff

vs

JP MORGAN CHASE BANK, N.A. INDIVIDUALLY/CORPORATELY AND AS TRUSTEE OF THE SOUTH TEXAS SYNDICATE TRUST AND GARY P. AYMES

Defendant

RETURN OF SERVICE

I, Louis Conant, make statement to the fact;  
That I am a competent person more than 18 years of age or older and not a party to this action, nor interested in outcome of the suit. That I received the documents stated below on 01/06/14 10:33 am, instructing for same to be delivered upon Stell, Michael F Ryder Scott Company Lp.

That I delivered to : Stell, Michael F Ryder Scott Company Lp.

the following : SUBPOENA REQUIRING MICHAEL F. STELL TO APPEAR FOR ORAL AND  
: VIDEOTAPED DEPOSITION; NOTICE OF INTENTION TO TAKE ORAL AND  
: VIDEOTAPED DEPOSITION OF MICHAEL F. STELL

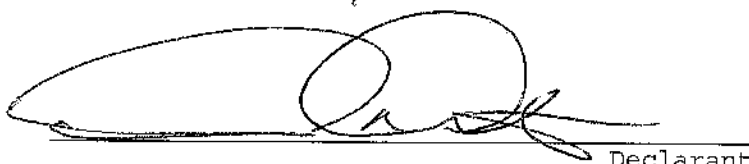
at this address : 1100 Louisiana Suite 4600  
: Houston, Harris County, TX 77002

Manner of Delivery : by PERSONALLY delivering the document(s) to the person above.

Delivered on : JAN 7, 2014 3:10 pm

My name is Louis Conant, my date of birth is JUL 19th, 1965, and my address is Professional Civil Process Houston, 1500 McGowen, Suite 140, Houston TX 77004, and U.S.A. I declare under penalty of perjury that the foregoing is true and correct. Executed in Harris County, State of Texas, on the 7th day of

JANUARY, 20 14.



Louis Conant

Declarant

Texas Certification#: SCH-5959 Exp. 10/31/15

Private Process Server  
Professional Civil Process Houston  
1500 McGowen, Suite 140 Houston TX 77004  
(713) 227-5858

PCP Inv. #H14100100



+ Service Fee: 65.00  
Witness Fee: 10.00  
Mileage Fee: .00

tomcat

AX02H14100100

Bobbitt, Calhoun



(Consolidated Under)  
CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET AL.	§	IN THE DISTRICT COURT
Plaintiffs,	§	
	§	
vs.	§	
	§	
JP MORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	225 <sup>TH</sup> JUDICIAL DISTRICT
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES,	§	
Defendants.	§	BEXAR COUNTY, TEXAS

SUBPOENA REQUIRING MICHAEL F. STELL  
TO APPEAR FOR ORAL AND VIDEOTAPED DEPOSITION

TO: Michael F. Stell  
Ryder Scott Company, LP  
1100 Louisiana, Suite 4600  
Houston, Texas 77002

Greetings:

YOU ARE COMMANDED to attend and give testimony at a deposition on oral questions at the following time and place:

TIME: 9:30 a.m.  
DATE: January 17, 2014  
PLACE: Ryder Scott Company, LP  
1100 Louisiana, Suite 4600  
Houston, Texas 77002

Your deposition will also be video recorded.

## DUTIES OF PERSON SERVED WITH SUBPOENA

You are advised under Texas Rules of Civil Procedure 176, a person served with a discovery subpoena has certain rights and obligations. Rule 176.6 provides:

(a) *Compliance required.* Except as provided in this subdivision, a person served with a subpoena must comply with the command stated in the subpoena unless discharged by the court or by the party summoning such witness. A person commanded to appear and give testimony must remain at the place of deposition, hearing, or trial from day to day until discharged by the court or by the party summoning the witness.

(b) *Organizations.* If a subpoena commanding testimony is directed to a corporation, partnership, association, governmental agency, or other organization, and the matters on which examination is requested are described with reasonable particularity, the organization must designate one or more persons to testify on its behalf as to matters known or reasonably available to the organization.

(c) *Production of documents or tangible things.* A person commanded to produce documents or tangible things need not appear in person at the time and place of production unless the person is also commanded to attend and give testimony, either in the same subpoena or a separate one. A person must produce documents as they are kept in the usual course of business or must organize and label them to correspond with the categories in the demand. A person may withhold material or information claimed to be privileged but must comply with Rule 193.3. A non-party's production of a document authenticates the document for use against the non-party to the same extent as a party's production of a document is authenticated for use against the party under Rule 193.7.

(d) *Objections.* A person commanded to produce and permit inspection and copying of designated documents and things may serve on the party requesting issuance of the subpoena--before the time specified for compliance--written objections to producing any or all of the designated materials. A person need not comply with the part of a subpoena to which objection is made as provided in this paragraph unless ordered to do so by the court. The party requesting the subpoena may move for such an order at any time after an objection is made.

(e) *Protective orders.* A person commanded to appear at a deposition, hearing, or trial, or to produce and permit inspection and copying of designated documents and things may move for a protective order under Rule 192.6(b)--before the time specified for compliance--either in the court in which the action is pending or in a district court in the county where the subpoena was served. The person must serve

the motion on all parties in accordance with Rule 21a. A person need not comply with the part of a subpoena from which protection is sought under this paragraph unless ordered to do so by the court. The party requesting the subpoena may seek such an order at any time after the motion for protection is filed.

**WARNING**

**Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.**

This subpoena is issued at the request of Plaintiffs and Plaintiff-Intervenors, whose attorneys of record are listed below.

Date of issuance: December 31, 2013.

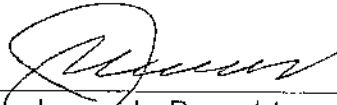
John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By:   
James L. Drought  
State Bar No. 06135000  
**ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.**

**RETURN OF SUBPOENA**

I certify that I served the annexed Subpoena by delivering a copy together with a fee of \$10.00 to Michael F. Stell in person at Ryder Scott Company, LP, 1100 Louisiana, Suite 4600, Houston, Texas 77002, on the \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

STATE OF TEXAS                   §  
  §  
COUNTY OF \_\_\_\_\_ §

This instrument was acknowledged before me on this the \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Notary Public, State of Texas

(Consolidated Under)  
CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET AL.	§	IN THE DISTRICT COURT
Plaintiffs,	§	
	§	
vs.	§	
	§	
JP MORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	225 <sup>TH</sup> JUDICIAL DISTRICT
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES,	§	
Defendants.	§	BEXAR COUNTY, TEXAS

NOTICE OF INTENTION TO TAKE ORAL AND  
VIDEOTAPED DEPOSITION OF MICHAEL F. STELL

TO: Michael F. Stell  
Ryder Scott Company, LP  
1100 Louisiana, Suite 4600  
Houston, Texas 77002

Please take notice that on behalf of Plaintiffs and Plaintiff-Intervenors, the oral and videotaped deposition of **Michael F. Stell** will be taken upon oral examination beginning at **9:30 a.m.** on **January 17, 2014**, and his answers may be used as testimony in the above-numbered and entitled cause. Said deposition will be taken at the offices of Ryder Scott Company, LP, 1100 Louisiana, Suite 4600, Houston, Texas 77002, by an official court reporter.

Please take notice that this deposition will be video recorded.

Respectfully submitted,

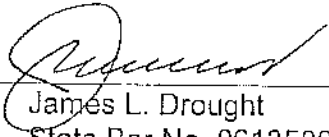
John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By:   
James L. Drought  
State Bar No. 06135000  
ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent by:

\_\_\_\_\_ U.S. Certified Mail, Return Receipt Requested to:  
 Facsimile to:  
\_\_\_\_\_ First Class Mail to:  
\_\_\_\_\_ Hand Delivery to:

Mr. Patrick K. Sheehan  
Mr. Rudy Garza  
Mr. David Jed Williams  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Mr. John C. Eichman  
Mr. Amy S. Bowen  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202



Mr. Fred W. Stumpf  
Boyer Short, A Professional Corporation  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046

on this the 13<sup>th</sup> day of December, 2013.



---

James L. Drought

(Consolidated Under)  
No. 2010-CI-10977

JOHN K. MEYER, ET AL : IN THE DISTRICT COURT  
: :  
: :  
vs. : 225TH JUDICIAL DISTRICT  
JP MORGAN CHASE BANK, N.A. INDIVIDUALLY/ :  
CORPORATELY AND AS TRUSTEE OF THE SOUTH :  
TEXAS SYNDICATE TRUST AND GARY P. AYMES : BEXAR COUNTY, TEXAS

**NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To Defendant by and through their attorney(s) of record: Fred W. Stumpf & Kelly M. Walne (Boyer Short), John C. Eichman & Amy S. Bowen (Hunton & Williams, LLP) and Patrick K. Sheehan, Rudy Garza & David Jed Williams (Hornberger Sheehan Fuller & Beiter Incorporated)

To other party/parties by and through their attorney(s) of record:

You will please take notice that twenty (20) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

**Hunt Oil Company**

before a Notary Public for **Kim Tindall & Associates, LLC**  
645 Lockhill Selma, Suite 200  
San Antonio, TX 78216  
(210) 697-3400 Fax (210) 697-3408

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena and cause it to be served on the witness.

**John B. Massopust (pro hac vice)**  
**Matthew J. Gollinger (pro hac vice)**  
**ZELLE HOFMANN VOELBEL & MASON LLP**  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,**  
**LINDA ALDRICH, ET AL.**

**Jim L. Flegle**  
State Bar No. 07118600  
**LOEWINSOHN FLEGLE DEARY, L.L.P.**  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,**  
**EMILIE BLAZE, ET AL.**

**Richard Tinsman**  
State Bar No. 20064000  
**Sharon C. Savage**  
State Bar No. 0474200  
**TINSMAN & SCIANO, INC.**  
10107 McAllister Fwy

San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By: Ian T. Bolden / Ric  
James L. Drought  
State Bar No. 06135000  
Ian T. Bolden  
State Bar No. 24082699  
ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.

---

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: January 28, 2014

by

Ruth Ann Lindgren

JOHN K. MEYER, ET AL : IN THE DISTRICT COURT  
: :  
: :  
vs. : 225TH JUDICIAL DISTRICT  
JP MORGAN CHASE BANK, N.A. INDIVIDUALLY/ : :  
CORPORATELY AND AS TRUSTEE OF THE SOUTH : :  
TEXAS SYNDICATE TRUST AND GARY P. AYMES : BEXAR COUNTY, TEXAS

**DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS**

1. Please state your full name and title.

Answer: \_\_\_\_\_

2. Please state the amount of consideration paid by lessees to JP Morgan, Trustee of the South Texas Syndicate Trust, for the Amendment to Oil and Gas Leases between the South Texas Syndicate Trust and Hunt Oil Company, et al. dated October 27, 2010 regarding the 683.48 ac. lease dated March 15, 2006, 4,224.7125 ac. and 3,094.0770 ac. leases dated July 25, 2006, and 2,371.205 ac. lease dated February 26, 2007, originally between South Texas Syndicate and Broad Oak Energy, Inc. in La Salle and McMullen Counties, Texas.

Answer: \_\_\_\_\_

3. Please state the amount of consideration paid by lessees to JP Morgan, Trustee of the South Texas Syndicate Trust, for the Amendment to Oil and Gas Leases between the South Texas Syndicate Trust and Hunt Oil Company, et al. dated January 6, 2011 regarding the 4,224.7125 ac. lease dated July 25, 2006 and 2,371.205 ac. lease dated February 26, 2007, originally between South Texas Syndicate and Broad Oak Energy, Inc. in La Salle and McMullen Counties, Texas.

Answer: \_\_\_\_\_

4. Please state the amount of consideration paid by lessees to JP Morgan, Trustee of the South Texas Syndicate Trust, for the Amendments to Oil and Gas Leases between the South Texas Syndicate Trust and Hunt Oil Company, et al. dated August 24, 2012 regarding the 683.48 ac. lease dated March 15, 2006, 4,224.7125 ac. and 3,094.0770 ac. leases dated July 25, 2006, and 2,371.205 ac. lease dated February 26, 2007 originally between South Texas Syndicate and Broad Oak Energy, Inc. in La Salle and McMullen Counties, Texas.

Answer: \_\_\_\_\_

\_\_\_\_\_  
WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC  
My Commission Expires: \_\_\_\_\_

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, *ET AL.*,

Plaintiffs,

JP MORGAN CHASE BANK, N.A.,  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST AND  
GARY P. AYMES,

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

225<sup>th</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**


TO: Defendant by and through their attorney(s) of record:, John C. Eichman & Amy S. Bowen (Hunton & Williams, LLP) and Patrick K. Sheehan, Rudy Garza & David Jed Williams (Hornberger Sheehan Fuller & Beiter Incorporated); and non-party counsel Fred W. Stumpf & Kelly M. Walne (Boyer Short).

You will please take notice that thirty (30) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

**SWEPI**  
c/o Jeffrey Webb, Senior Associate  
Fulbright & Jaworski LLP  
300 Convent Street, Suite 2100  
San Antonio, TX 78205

before a Notary Public for **Kim Tindall & Associates, LLC**  
**645 Lockhill Selma, Suite 200**  
**San Antonio, TX 78216**  
**(210) 697-3400 Fax (210) 697-3408**

or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 200, Texas Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena and cause it to be served on the witness.


  
**James L. Drought**  
**SBA # 0613500**  
**Ian T. Bolden**  
**SBA # 24082699**  
**Drought, Drought & Bobbitt, L.L.P.**  
**112 E. Pecan, Suite 2900**  
**San Antonio, TX 78205**

(210) 225-4031 Fax (210) 222-0586  
Attorney for Plaintiff

---

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, fax, and/or certified mail, return receipt requested, on this day.

Dated: January 28, 2014

by 

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, *ET AL.*,

Plaintiffs,

JP MORGAN CHASE BANK, N.A.,  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST AND  
GARY P. AYMES,

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

225<sup>th</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS**

Custodian of Records for: **SWEPI**

1. Please state your full name, title, and employer.

Answer: \_\_\_\_\_

2. Are you a custodian of records for SWEPI?

Answer: \_\_\_\_\_

3. What is the exact date of the mineral lease signed in May of 2010 as between Harrison Interests, Ltd. (Lessor) and P Ranch Working Interest, LLC (Lessee) for approximately 105,937.48 acres of land in Dimmitt, Webb and La Salle Counties (the Lease)?

Answer: \_\_\_\_\_

4. What were the gross and net acreages subject to the Lease?

Answer: \_\_\_\_\_

5. What was the per acre bonus consideration, both financial and non-financial, paid to the Lessors(s) in connection with the Lease?

Answer: \_\_\_\_\_

6. Was the bonus consideration paid in connection with the Lease a one-time payment or a payment keyed to well performance?

Answer: \_\_\_\_\_

7. Was the Lease "paid up" such that delay rentals for the entire primary term were paid in advance with the bonus consideration?

Answer: \_\_\_\_\_

8. Was the royalty percentage payable under the Lease 25%?

Answer: \_\_\_\_\_

9. Did the Lease cover only rights within the Eagle Ford strata?

Answer: \_\_\_\_\_

10. With respect to the Lease, on what date did the Lessee sign a confidentiality agreement allowing Lessee access to the Lessor's data room?

Answer: \_\_\_\_\_

\_\_\_\_\_  
WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity herein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_



225th District Court of BEXAR County, Texas  
100 DOLOROSA ST #200 SAN ANTONIO TX 78205

Case #: 2010-CI-10977

Bexar County District Clerk

Accepted By: Maria Jackson  
JOHN K. MEYER, ET AL

Plaintiff

vs  
JP MORGAN CHASE BANK, N.A. INDIVIDUALLY/CORPORATELY AND AS TRUSTEE OF THE SOUTH TEXAS SYNDICATE TRUST AND GARY P. AYMES

Defendant

RETURN OF SERVICE

I, Louis Conant, make statement to the fact;  
That I am a competent person more than 18 years of age or older and not a party to this action, nor interested in outcome of the suit. That I received the documents stated below on 01/06/14 10:33 am, instructing for same to be delivered upon Crow, Greg Manager/Mineral Property Manager/Landman Travis Property Management Llc.

That I delivered to : Crow, Greg Manager/Mineral Property Manager/Landman Travis  
: Property Management Llc.

the following : SUBPOENA REQUIRING GREG CROW TO APPEAR FOR ORAL AND VIDEOTAPED  
: DEPOSITION; AMENDED NOTICE OF INTENTION TO TAKE ORAL AND  
: VIDEOTAPED DEPOSITION OF GREG CROW

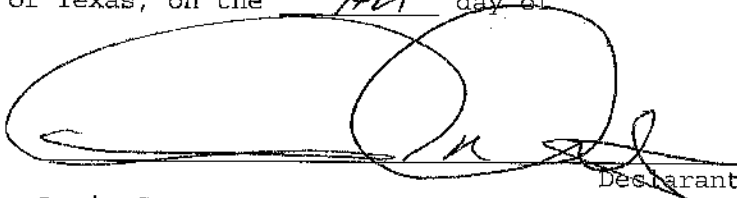
at this address : 801 Travis Suite 2180  
: Houston, Harris County, TX 77002

Manner of Delivery : by PERSONALLY delivering the document(s) to the person above.

Delivered on : JAN 7, 2014 2:55 pm

My name is Louis Conant, my date of birth is JUL 19th, 1965, and my address is Professional Civil Process Houston, 1500 McGowen, Suite 140, Houston TX 77004, and U.S.A. I declare under penalty of perjury that the foregoing is true and correct. Executed in Harris County, State of Texas, on the 7th day of

JANUARY, 2014.



Declarant

Louis Conant

Texas Certification#: SCH-5959 Exp. 10/31/15

Private Process Server  
Professional Civil Process Houston  
1500 McGowen, Suite 140 Houston TX 77004  
(713) 227-5858

PCP Inv. #H14100102



AX02H14100102

+ Service Fee: 65.00  
Witness Fee: 10.00  
Mileage Fee: .00

tomcat

Bobbitt, Calhoun

(Consolidated Under)  
**CAUSE NO. 2010-CI-10977**

<b>JOHN K. MEYER, ET AL.</b>	<b>§</b>	<b>IN THE DISTRICT COURT</b>
<b>Plaintiffs,</b>	<b>§</b>	
	<b>§</b>	
<b>vs.</b>	<b>§</b>	
	<b>§</b>	
<b>JP MORGAN CHASE BANK, N.A.</b>	<b>§</b>	
<b>INDIVIDUALLY/CORPORATELY</b>	<b>§</b>	<b>225<sup>TH</sup> JUDICIAL DISTRICT</b>
<b>AND AS TRUSTEE OF THE SOUTH</b>	<b>§</b>	
<b>TEXAS SYNDICATE TRUST</b>	<b>§</b>	
<b>and GARY P. AYMES,</b>	<b>§</b>	
<b>Defendants.</b>	<b>§</b>	<b>BEXAR COUNTY, TEXAS</b>

**SUBPOENA REQUIRING GREG CROW  
TO APPEAR FOR ORAL AND VIDEOTAPED DEPOSITION**

TO: Greg Crow  
Manager/Mineral Property Manager/Landman  
Travis Property Management, LLC  
801 Travis, Suite 2180  
Houston, TX 77002

Greetings:

YOU ARE COMMANDED to attend and give testimony at a deposition on oral questions at the following time and place:

TIME: 1:30 p.m.  
DATE: January 22, 2014  
PLACE:: Manager/Mineral Property Manager/Landman  
Travis Property Management, LLC  
801 Travis, Suite 2180  
Houston, TX 77002

Your deposition will also be video recorded.

## DUTIES OF PERSON SERVED WITH SUBPOENA

You are advised under Texas Rules of Civil Procedure 176, a person served with a discovery subpoena has certain rights and obligations. Rule 176.6 provides:

(a) *Compliance required.* Except as provided in this subdivision, a person served with a subpoena must comply with the command stated in the subpoena unless discharged by the court or by the party summoning such witness. A person commanded to appear and give testimony must remain at the place of deposition, hearing, or trial from day to day until discharged by the court or by the party summoning the witness.

(b) *Organizations.* If a subpoena commanding testimony is directed to a corporation, partnership, association, governmental agency, or other organization, and the matters on which examination is requested are described with reasonable particularity, the organization must designate one or more persons to testify on its behalf as to matters known or reasonably available to the organization.

(c) *Production of documents or tangible things.* A person commanded to produce documents or tangible things need not appear in person at the time and place of production unless the person is also commanded to attend and give testimony, either in the same subpoena or a separate one. A person must produce documents as they are kept in the usual course of business or must organize and label them to correspond with the categories in the demand. A person may withhold material or information claimed to be privileged but must comply with Rule 193.3. A non-party's production of a document authenticates the document for use against the non-party to the same extent as a party's production of a document is authenticated for use against the party under Rule 193.7.

(d) *Objections.* A person commanded to produce and permit inspection and copying of designated documents and things may serve on the party requesting issuance of the subpoena--before the time specified for compliance--written objections to producing any or all of the designated materials. A person need not comply with the part of a subpoena to which objection is made as provided in this paragraph unless ordered to do so by the court. The party requesting the subpoena may move for such an order at any time after an objection is made.

(e) *Protective orders.* A person commanded to appear at a deposition, hearing, or trial, or to produce and permit inspection and copying of designated documents and things may move for a protective order under Rule 192.6(b)--before the time specified for compliance--either in the court in which the action is pending or in a district court in the county where the subpoena was served. The person must serve

the motion on all parties in accordance with Rule 21a. A person need not comply with the part of a subpoena from which protection is sought under this paragraph unless ordered to do so by the court. The party requesting the subpoena may seek such an order at any time after the motion for protection is filed.

**WARNING**

**Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.**

This **subpoena** is issued at the request of Plaintiffs and Plaintiff-Intervenors, whose attorneys of record are listed below.

Date of issuance: December 31, 2013.

John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By:   
James L. Drought

State Bar No. 06135000

**ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.**

**RETURN OF SUBPOENA**

I certify that I served the annexed Subpoena by delivering a copy together with a fee of \$10.00 to Greg Crow, Manager/Mineral Property Manager/Landman, in person at Travis Property Management, LLC, 801 Travis, Suite 2180, Houston, TX 77002, on the \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

STATE OF TEXAS           §  
  §  
COUNTY OF \_\_\_\_\_ §

This instrument was acknowledged before me on this the \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Notary Public, State of Texas

(Consolidated Under)  
CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET AL.	§	IN THE DISTRICT COURT
Plaintiffs,	§	
	§	
vs.	§	
	§	
JP MORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	225 <sup>TH</sup> JUDICIAL DISTRICT
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES,	§	
Defendants.	§	BEXAR COUNTY, TEXAS

AMENDED NOTICE OF INTENTION TO TAKE ORAL AND  
VIDEOTAPED DEPOSITION OF GREG CROW

TO: Greg Crow  
c/o Mr. Patrick K. Sheehan  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Please take notice that on behalf of Plaintiffs and Plaintiff-Intervenors, the oral and videotaped deposition of **Greg Crow** will be taken upon oral examination beginning at **1:30 p.m. on January 22, 2014**, and his answers may be used as testimony in the above-numbered and entitled cause. Said deposition will be taken at the offices of Hornberger Sheehan Fuller Beiter Wittenberg & Garza, Inc., The Quarry Heights Building, 7373 Broadway, Suite 300, San Antonio, TX 78209, by an official court reporter.

Please take notice that this deposition will be video recorded.

Respectfully submitted,

John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

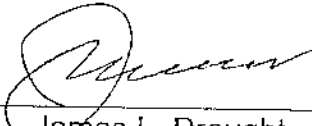
Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732



DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By:   
James L. Drought  
State Bar No. 06135000

**ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been sent by:

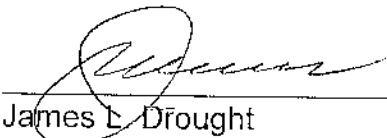
U.S. Certified Mail, Return Receipt Requested to:  
 Facsimile to:  
 First Class Mail to:  
 Hand Delivery to:

Mr. Patrick K. Sheehan  
Mr. Rudy Garza  
Mr. David Jed Williams  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Mr. John C. Eichman  
Mr. Amy S. Bowen  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202

Mr. Fred W. Stumpf  
Boyer Short, A Professional Corporation  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046

on this the 31<sup>st</sup> day of December, 2013.



---

James E. Drought

225th District Court of BEXAR County, Texas

100 DOLOROSA ST #200 SAN ANTONIO TX 78205

Bexar County District Clerk

Case #: 2010-CI-10977

Accepted By: Maria Jackson

JOHN K. MEYER, ET AL

Plaintiff

vs  
JP MORGAN CHASE BANK, N.A. INDIVIDUALLY/CORPORATELY AND AS TRUSTEE OF THE SOUTH TEXAS SYNDICATE TRUST AND GARY P. AYMES

Defendant

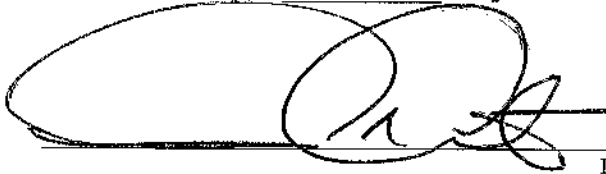
RETURN OF SERVICE

I, Louis Conant, make statement to the fact;  
That I am a competent person more than 18 years of age or older and not a party to this action, nor interested in outcome of the suit. That I received the documents stated below on 01/10/14 9:45 am, instructing for same to be delivered upon Fordyce, Douglas A.

That I delivered to : Fordyce, Douglas A.  
the following : SUBPOENA REQUIRING DOUGLAS A. FORDYCE TO APPEAR FOR ORAL AND  
: VIDEOTAPED DEPOSITION; NOTICE OF INTENTION TO TAKE ORAL AND  
: VIDEOTAPED DEPOSITION OF DOUGLAS A. FORDYCE  
at this address : 600 Travis Street Suite 2300  
: Houston, Harris County, TX 77002  
Manner of Delivery : by PERSONALLY delivering the document(s) to the person above.  
Delivered on : January 10, 2014 11:10 am

My name is Louis Conant, my date of birth is July 19th, 1965, and my address is Professional Civil Process Houston, 1500 McGowen, Suite 140, Houston TX 77004, and U.S.A. I declare under penalty of perjury that the foregoing is true and correct. Executed in Harris County, State of Texas, on the 10 day of

January, 20 14.



Declarant

Texas Certification#: SCH-5959 Exp. 10/31/15

Private Process Server  
Professional Civil Process Houston  
1500 McGowen, Suite 140 Houston TX 77004  
(713) 227-5858

PCP Inv. #H14100753



+ Service Fee: 65.00  
Witness Fee: 10.00  
Mileage Fee: .00

klaegerb

Bobbitt, Calhoun

(Consolidated Under)  
**CAUSE NO. 2010-CI-10977**

<b>JOHN K. MEYER, ET AL.</b>	<b>§</b>	<b>IN THE DISTRICT COURT</b>
<b>Plaintiffs,</b>	<b>§</b>	
	<b>§</b>	
<b>vs.</b>	<b>§</b>	
	<b>§</b>	
<b>JP MORGAN CHASE BANK, N.A.</b>	<b>§</b>	
<b>INDIVIDUALLY/CORPORATELY</b>	<b>§</b>	<b>225<sup>TH</sup> JUDICIAL DISTRICT</b>
<b>AND AS TRUSTEE OF THE SOUTH</b>	<b>§</b>	
<b>TEXAS SYNDICATE TRUST</b>	<b>§</b>	
<b>and GARY P. AYMES,</b>	<b>§</b>	
<b>Defendants.</b>	<b>§</b>	<b>BEXAR COUNTY, TEXAS</b>

**SUBPOENA REQUIRING DOUGLAS A. FORDYCE  
TO APPEAR FOR ORAL AND VIDEOTAPED DEPOSITION**

TO: Douglas A. Fordyce  
Lazard Freres & Co. LLC  
600 Travis Street, Suite 2300  
Houston, Texas 77002

Greetings:

YOU ARE COMMANDED to attend and give testimony at a deposition on oral questions at the following time and place:

TIME: 9:30 a.m.  
DATE: January 23, 2014  
PLACE:: Lazard Freres & Co. LLC  
600 Travis Street, Suite 2300  
Houston, Texas 77002

Your deposition will also be video recorded.

## DUTIES OF PERSON SERVED WITH SUBPOENA

You are advised under Texas Rules of Civil Procedure 176, a person served with a discovery subpoena has certain rights and obligations. Rule 176.6 provides:

(a) *Compliance required.* Except as provided in this subdivision, a person served with a subpoena must comply with the command stated in the subpoena unless discharged by the court or by the party summoning such witness. A person commanded to appear and give testimony must remain at the place of deposition, hearing, or trial from day to day until discharged by the court or by the party summoning the witness.

(b) *Organizations.* If a subpoena commanding testimony is directed to a corporation, partnership, association, governmental agency, or other organization, and the matters on which examination is requested are described with reasonable particularity, the organization must designate one or more persons to testify on its behalf as to matters known or reasonably available to the organization.

(c) *Production of documents or tangible things.* A person commanded to produce documents or tangible things need not appear in person at the time and place of production unless the person is also commanded to attend and give testimony, either in the same subpoena or a separate one. A person must produce documents as they are kept in the usual course of business or must organize and label them to correspond with the categories in the demand. A person may withhold material or information claimed to be privileged but must comply with Rule 193.3. A non-party's production of a document authenticates the document for use against the non-party to the same extent as a party's production of a document is authenticated for use against the party under Rule 193.7.

(d) *Objections.* A person commanded to produce and permit inspection and copying of designated documents and things may serve on the party requesting issuance of the subpoena--before the time specified for compliance--written objections to producing any or all of the designated materials. A person need not comply with the part of a subpoena to which objection is made as provided in this paragraph unless ordered to do so by the court. The party requesting the subpoena may move for such an order at any time after an objection is made.

(e) *Protective orders.* A person commanded to appear at a deposition, hearing, or trial, or to produce and permit inspection and copying of designated documents and things may move for a protective order under Rule 192.6(b)--before the time specified for compliance--either in the court in which the action is pending or in a district court in the county where the subpoena was served. The person must serve

the motion on all parties in accordance with Rule 21a. A person need not comply with the part of a subpoena from which protection is sought under this paragraph unless ordered to do so by the court. The party requesting the subpoena may seek such an order at any time after the motion for protection is filed.

**WARNING**

**Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.**

This **subpoena** is issued at the request of Plaintiffs and Plaintiff-Intervenors, whose attorneys of record are listed below.

Date of issuance: January 8, 2014.


John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By:   
James L. Drought  
State Bar No. 06135000

**ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.**

**RETURN OF SUBPOENA**

I certify that I served the annexed Subpoena by delivering a copy together with a fee of \$10.00 to Douglas A. Fordyce, in person at Lazard Freres & Co. LLC, 600 Travis Street, Suite 2300, Houston, Texas 77002, on the \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

STATE OF TEXAS            §  
  §  
COUNTY OF \_\_\_\_\_ §

This instrument was acknowledged before me on this the \_\_\_\_\_ day of \_\_\_\_\_, 2014.

\_\_\_\_\_  
Notary Public, State of Texas



(Consolidated Under)  
CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET AL.	§	IN THE DISTRICT COURT
Plaintiffs,	§	
	§	
vs.	§	
	§	
JP MORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	225 <sup>TH</sup> JUDICIAL DISTRICT
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES,	§	
Defendants.	§	BEXAR COUNTY, TEXAS

NOTICE OF INTENTION TO TAKE ORAL AND  
VIDEOTAPED DEPOSITION OF DOUGLAS A. FORDYCE

TO: Douglas A. Fordyce  
Lazard Freres & Co. LLC  
600 Travis Street, Suite 2300  
Houston, Texas 77002

Please take notice that on behalf of Plaintiffs and Plaintiff-Intervenors, the oral and videotaped deposition of **Douglas A Fordyce** will be taken upon oral examination beginning at **9:30 a.m. on January 23, 2014**, and his answers may be used as testimony in the above-numbered and entitled cause. Said deposition will be taken at the offices of Lazard Freres & Co. LLC, 600 Travis Street, Suite 2300, Houston, Texas 77002, by an official court reporter.

Please take notice that this deposition will be video recorded.

Respectfully submitted,


John B. Massopust (*pro hac vice*)  
Matthew J. Gollinger (*pro hac vice*)  
ZELLE HOFMANN VOELBEL & MASON LLP  
500 Washington Avenue South, Suite 4000  
Minneapolis, Minnesota 55415-1152  
(612) 339-2020 - Telephone  
(612) 336-9100 - Facsimile  
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,  
LINDA ALDRICH, ET AL.**

Jim L. Flegle  
State Bar No. 07118600  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Dr., Suite 900  
Dallas, Texas 75251  
(214) 572-1700 - Telephone  
(214) 572-1717 - Facsimile  
**ATTORNEYS FOR PLAINTIFFS,  
EMILIE BLAZE, ET AL.**

Richard Tinsman  
State Bar No. 20064000  
Sharon C. Savage  
State Bar No. 0474200  
TINSMAN & SCIANO, INC.  
10107 McAllister Fwy  
San Antonio, Texas 78216  
Telephone: (210) 225-3121  
Facsimile: (210) 225-6235

George H. Spencer, Jr.  
State Bar No. 18921001  
Robert Rosenbach  
State Bar No. 17266400  
CLEMENS & SPENCER, P.C.  
112 East Pecan Street, Suite 1300  
San Antonio, Texas 78205  
Telephone: (210) 227-7121  
Facsimile: (210) 227-0732

DROUGHT, DROUGHT & BOBBITT, LLP  
2900 Weston Centre  
112 East Pecan Street  
San Antonio, Texas 78205  
(210) 225-4031 Telephone  
(210) 222-0586 Telecopier

By:   
James L. Drought  
State Bar No. 06135000  
**ATTORNEYS FOR PLAINTIFFS,  
JOHN K. MEYER, ET AL.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been sent by:


U.S. Certified Mail, Return Receipt Requested to:  
 Facsimile to:  
 First Class Mail to:  
 Hand Delivery to:

Mr. Patrick K. Sheehan  
Mr. Rudy Garza  
Mr. David Jed Williams  
Hornberger Sheehan Fuller Beiter Wittenberg & Garza Incorporated  
7373 Broadway, Suite 300  
San Antonio, TX 78209

Mr. John C. Eichman  
Mr. Amy S. Bowen  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202

Mr. Fred W. Stumpf  
Boyer Short, A Professional Corporation  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046

on this the 13<sup>th</sup> day of December, 2013.

  
James L. Drought

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.,  
Plaintiffs,

V.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES,  
Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**NOTICE OF FILING AFFIDAVIT OF STEVE AREA**

JPMORGAN CHASE BANK, N.A., as Trustee of the South Texas Syndicate Trust, files the Affidavit of Steve Area, attached hereto as Exhibit "1", in response to Plaintiffs' Motion to Compel Defendants to produce "the standard monthly reports prepared by Bertram Hayes-Davis for the April 2008 through July 2012 time period."

Respectfully submitted,

**HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED**

7373 Broadway, Suite 300  
San Antonio, Texas 78209  
(210) 271-1700 Telephone  
(210) 271-1740 Fax

By: /s/ David Jed Williams

Patrick K. Sheehan  
psheehan@hsfblaw.com  
State Bar No. 18175500  
Kevin M. Beiter  
kbeiter@hsfblaw.com  
State Bar No. 02059065  
Rudy A. Garza  
rugar@hsfblaw.com  
State Bar No. 07738200  
David Jed Williams  
jwilliams@hsfblaw.com  
State Bar No. 21518060

**ATTORNEYS FOR DEFENDANTS**

HUNTON & WILLIAMS LLP

Charles A. Gall

[cgall@hunton.com](mailto:cgall@hunton.com)

State Bar No. 07281500

John C. Eichman

[jeichman@hunton.com](mailto:jeichman@hunton.com)

State Bar No. 06494800

Amy S. Bowen

[abowen@hunton.com](mailto:abowen@hunton.com)

State Bar No. 24028216

**ATTORNEYS FOR DEFENDANT  
JPMORGAN CHASE BANK, N.A., AS  
TRUSTEE OF THE SOUTH TEXAS  
SYNDICATE TRUST**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served on the following counsel of record via the electronic service manager and/or by email on this 28<sup>th</sup> day of January, 2014:

Mr. George Spencer, Jr.  
Mr. Jeffrey J. Jowers  
CLEMENS & SPENCER  
112 East Pecan, Suite 1300  
San Antonio, Texas 78205  
[spencer@clemmens-spencer.com](mailto:spencer@clemmens-spencer.com)  
[jjowers@clemens-spencer.com](mailto:jjowers@clemens-spencer.com)

Mr. David R. Deary  
Mr. Jim L. Flegle  
Mr. Jeven R. Sloan  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)  
[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)  
[jevens@LFDlaw.com](mailto:jevens@LFDlaw.com)

Mr. James L. Drought  
Mr. Ian Bolden  
DROUGHT DROUGHT & BOBBITT, LLP  
112 East Pecan, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)  
[itb@ddb-law.com](mailto:itb@ddb-law.com)

Mr. Steven J. Badger  
Ms. Ashley Bennett Jones  
ZELLE HOFMANN VOELBEL & MASON  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zelle.com](mailto:sbadger@zelle.com)  
[ajones@zelle.com](mailto:ajones@zelle.com)

Mr. Richard Tinsman  
Ms. Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78216  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

Mr. John B. Massopust  
ZELLE HOFMANN VOELBEL & MASON  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)

Mr. Michael S. Christian  
ZELLE HOFMANN VOELBEL & MASON  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

Mr. Matthew J. Gollinger  
ZELLE HOFMANN VOELBEL & MASON  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[mgollinger@zelle.com](mailto:mgollinger@zelle.com)

Mr. Fred W. Stumpf  
GLAST, PHILLIPS & MURRAY  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

\_\_\_\_\_  
s/s David Jed Williams  
David Jed Williams

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.

§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

VS.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

225<sup>TH</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**AFFIDAVIT OF STEVE AREA**

STATE OF TEXAS §  
  §  
COUNTY OF DALLAS §

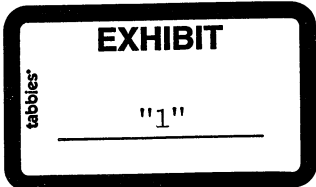
BEFORE ME, the undersigned authority, on this day personally appeared Steve Area, who having been duly sworn, on his oath, stated as following:

1. "My name is Steve Area. I am over the age of 18 years and I am of sound mind and fully competent to make this Affidavit. I have personal knowledge of the statements made in this affidavit, and the statements in this affidavit are true and correct. I make this affidavit in support of Defendant J.P. Morgan Chase Bank, N.A.'s ("J.P. Morgan") response to Plaintiffs' Motion to Compel regarding Request for Production No. 1 contained in Plaintiffs' Sixth Request for Production, which requested copies of the "the standard monthly reports prepared by Bertram Hayes-Davis for the April 2008 through July 2012 time period."

2. I am Executive Director, Specialty Assets – Oil and Gas for J.P. Morgan. I am generally familiar with the matters contained within the requested reports. These reports provide high level information regarding operational aspects of Specialty Assets - Oil and Gas department. This is not information pertaining to any particular account, such as the STS Trust.

3. These reports contain highly confidential and business sensitive information


{00039769.1}



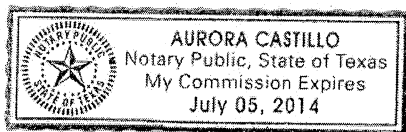


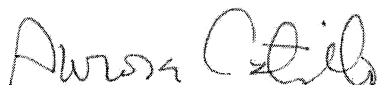
regarding the financial operations of the Oil and Gas division of the Specialty Assets business that operates within Global Wealth Management. The business and financial information provided to senior management by the Oil and Gas division monthly as part of a business review of Specialty Assets is not in any way account specific but rather reflects a compilation of all accounts globally that contain oil and gas assets. The reporting provided is not in any way specific to the management and administration of the STS Trust and does not specifically reflect revenue, expenses or fees generated or incurred by the STS Trust, all of which specific information is provided to the STS Trust beneficiaries in trust statements and annual accountings.”

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Steve Area

Sworn and subscribed to before me by the said Steve Area on the 28<sup>th</sup> day of January 2014, to certify which witness my hand and seal of office.



  
\_\_\_\_\_  
Notary Public in and for the State of Texas

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.,  
Plaintiffs,

V.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES,  
Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**NOTICE OF FILING AFFIDAVIT OF PAULA BAKER**

JPMORGAN CHASE BANK, N.A., as Trustee of the South Texas Syndicate Trust, files the Affidavit of Paula Baker, attached hereto as Exhibit "1", in response to Plaintiffs' Motion to Compel the production of the Fiduciary Governance Committee Minutes for the years 2008, 2009 and 2010.

Respectfully submitted,

**HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED**

7373 Broadway, Suite 300  
San Antonio, Texas 78209  
(210) 271-1700 Telephone  
(210) 271-1740 Fax

By: /s/ David Jed Williams

Patrick K. Sheehan  
psheehan@hsfblaw.com  
State Bar No. 18175500  
Kevin M. Beiter  
kbeiter@hsfblaw.com  
State Bar No. 02059065  
Rudy A. Garza  
rugar@hsfblaw.com  
State Bar No. 07738200  
David Jed Williams  
jwilliams@hsfblaw.com  
State Bar No. 21518060

**ATTORNEYS FOR DEFENDANTS**

HUNTON & WILLIAMS LLP

Charles A. Gall

[cgall@hunton.com](mailto:cgall@hunton.com)

State Bar No. 07281500

John C. Eichman

[jeichman@hunton.com](mailto:jeichman@hunton.com)

State Bar No. 06494800

Amy S. Bowen

[abowen@hunton.com](mailto:abowen@hunton.com)

State Bar No. 24028216

**ATTORNEYS FOR DEFENDANT  
JPMORGAN CHASE BANK, N.A., AS  
TRUSTEE OF THE SOUTH TEXAS  
SYNDICATE TRUST**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on the following counsel of record via the electronic service manager and/or by email on this 28<sup>th</sup> day of January, 2014:

Mr. George Spencer, Jr.  
Mr. Jeffrey J. Jowers  
CLEMENS & SPENCER  
112 East Pecan, Suite 1300  
San Antonio, Texas 78205  
[spencer@clemmens-spencer.com](mailto:spencer@clemmens-spencer.com)  
[jjowers@clemens-spencer.com](mailto:jjowers@clemens-spencer.com)

Mr. David R. Deary  
Mr. Jim L. Flegle  
Mr. Jeven R. Sloan  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)  
[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)  
[jevens@LFDlaw.com](mailto:jevens@LFDlaw.com)

Mr. James L. Drought  
Mr. Ian Bolden  
DROUGHT DROUGHT & BOBBITT, LLP  
112 East Pecan, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)  
[itb@ddb-law.com](mailto:itb@ddb-law.com)

Mr. Steven J. Badger  
Ms. Ashley Bennett Jones  
ZELLE HOFMANN VOELBEL & MASON  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zelle.com](mailto:sbadger@zelle.com)  
[ajones@zelle.com](mailto:ajones@zelle.com)

Mr. Richard Tinsman  
Ms. Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78216  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

Mr. John B. Massopust  
ZELLE HOFMANN VOELBEL & MASON  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)

Mr. Michael S. Christian  
ZELLE HOFMANN VOELBEL & MASON  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

Mr. Matthew J. Gollinger  
ZELLE HOFMANN VOELBEL & MASON  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[mgollinger@zelle.com](mailto:mgollinger@zelle.com)

Mr. Fred W. Stumpf  
GLAST, PHILLIPS & MURRAY  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

\_\_\_\_\_  
s/s David Jed Williams  
David Jed Williams

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.

§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

VS.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

225<sup>TH</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**AFFIDAVIT OF PAULA BAKER**

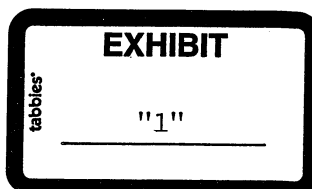
STATE OF NEW YORK §

COUNTY OF New York §

BEFORE ME, the undersigned authority, on this day personally appeared Paula Baker, who having been duly sworn, on her oath, stated as following:

1. "My name is Paula Baker. I am over the age of 18 years and I am of sound mind and fully competent to make this Affidavit. I have personal knowledge of the statements made in this affidavit, and the statements in this affidavit are true and correct. I make this affidavit in support of Defendant J.P. Morgan Chase Bank, N.A.'s ("JPMorgan") response to Plaintiffs' Motion to Compel regarding Request for Production No. 3 contained in Plaintiffs' Sixth Request for Production, which requested a copy of the "the Fiduciary Governance Committee Minutes for the years 2008, 2009, and 2010."

2. I am Chief Fiduciary Executive for JPMorgan. I served as a member of the JPMorgan Fiduciary Governance Committee during the time frame 2008-2010 and served as Chair during part of that time. In my position as a member and Chair of that committee, I am familiar with the matters that were routinely considered by the Fiduciary Governance Committee ("the Committee") as reflected in the minutes.



3. The general purpose of the Committee was to oversee the fiduciary and related investment activities of JPMorgan Private Bank and Private Wealth Management to ensure compliance with policies, procedures and regulatory requirements. The Committee held quarterly meetings to review and take action on such matters. Minutes were taken of the meetings.

4. In my position as Chief Fiduciary Executive for JPMorgan, I am generally familiar with the matters at issue in the STS Trust litigation. Based upon my knowledge as to the matters routinely considered by the Committee and reported in the minutes, the matters that could potentially pertain to the management and administration of the STS Trust would be discussion and approval of oil and gas policies and procedures as well as discussion of oil and gas operations and administration.


5. Other matters considered by the Committee as reflected in the committee minutes do not pertain to oil and gas policies and procedures and oil and gas operations and administration. Additionally, the Committee did not discuss specific trust accounts, including the STS Trust; the review was much broader in scope.

6. The Committee minutes contain confidential and sensitive information regarding a variety of matters pertaining to the fiduciary and related investment activities of JPMorgan Private Bank and Private Wealth Management that are not relevant to the management and administration of the STS Trust or the matters at issue in the STS Trust litigation.”

FURTHER AFFIANT SAYETH NOT.

  
Paula Baker

Sworn and subscribed to before me by the said Paula Baker on the 28 day of January  
2014, to certify which witness my hand and seal of office.

  
\_\_\_\_\_  
Notary Public in and for the State of New York

ROBB MICHAEL LAMANNA  
Notary Public, State of New York  
Qualified in Westchester County  
Reg. No. 01LA6019781  
My Commission Expires May 7, 2015

Cause No. 2010-CI-10977

JOHN K. MEYER, ET AL.,	§	IN THE DISTRICT COURT
	§	
PLAINTIFFS,	§	
	§	
VS.	§	
	§	225TH JUDICIAL DISTRICT
	§	
JPMORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST AND	§	
GARY P. AYMES,	§	
	§	
DEFENDANTS.	§	BEXAR COUNTY, TEXAS

**DEFENDANT JPMORGAN CHASE BANK, N.A.’S RESPONSE TO PLAINTIFFS’  
MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS RELATED TO *JP  
MORGAN CHASE BANK, N.A., IN ITS CAPACITY AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST V. PIONEER NATURAL RESOURCES USA, INC.  
AND EOG RESOURCES, INC.***

JPMorgan Chase Bank, N.A., in its capacity as trustee of the South Texas Syndicate Trust (“JPMorgan”), files this Response to Plaintiffs’ Motion to Compel (the “Motion to Compel”) the Production of Documents Related to *JP Morgan Chase Bank, N.A., In Its Capacity as Trustee of the South Texas Syndicate Trust v. Pioneer Natural Resources USA, Inc. and EOG Resources, Inc.* (the “Pioneer Litigation”) as follows:

**Introduction**

Plaintiffs seek to compel JPMorgan to produce all privileged documents it has in its possession from the Pioneer Litigation. As an initial matter, JPMorgan has complied with Plaintiffs’ *proper* discovery requests concerning the Pioneer Litigation. To date, JPMorgan has produced all non-privileged correspondence with Pioneer’s counsel, internal communications and communications with third parties, and beneficiary communications. Multiple JPMorgan witnesses have testified in depositions to factual information about the Pioneer Litigation.



JPMorgan only seeks to withhold information protected by the attorney-client and work product privileges. Further, Plaintiffs' arguments for compelling production of privileged documents from the Pioneer Litigation fly in the face of black letter law articulated by the Texas Supreme Court in *Huie v. DeShazo*: a trust beneficiary simply cannot compel a trustee to produce information covered by the attorney-client or work product privileges. Those privileges are the trustee's to assert and are immune from attack based on any common law disclosure obligations.

### **Factual Background**

This dispute involves Plaintiffs' allegations of breach of fiduciary duty and trust, fraud, and negligent misrepresentation against JPMorgan as trustee of the South Texas Syndicate Trust (the "Trust"). Plaintiffs hold certificates of beneficial interest in the Trust for which JPMorgan serves as trustee. In their Fifth Amended Petition, Plaintiffs allege that JPMorgan breached its fiduciary duty as trustee by "the actions taken and not taken in filing, litigating and settling" a lawsuit against Pioneer Natural Resources USA, Inc. and EOG Resources, Inc. to terminate certain leases of mineral rights belonging to the Trust (the "Pioneer Litigation"). (Fifth Amended Petition at ¶ 174).

JPMorgan retained the law firm Cox Smith Matthews, Inc. ("Cox Smith") to represent it in the Pioneer Litigation. In addition to hiring Cox Smith, JPMorgan also had in-house attorneys advising it on the Pioneer Litigation. Contrary to the implication of the Motion to Compel, JPMorgan kept the beneficiaries of the Trust well informed regarding substantive developments in the Pioneer Litigation throughout the time the suit was pending. JPMorgan periodically communicated with Plaintiffs via email regarding the status of the case against Pioneer and

EOG.<sup>1</sup> JPMorgan also sent monthly memoranda updates to the beneficiaries in which JPMorgan provided information concerning the status of the Pioneer Litigation.<sup>2</sup>

In the present suit, Plaintiffs served document requests on JPMorgan, seeking “the complete litigation file, including but not limited to all work product and attorney-client communications, for the Pioneer/EOG dispute or litigation.” (See Defendant JP Morgan Chase Bank, N.A.’s Objections and Responses to Plaintiff’s Request for Production No. 84, attached as Exhibit 1.) In response, JPMorgan objected based on the attorney-client and work product privileges and on several other grounds. *Id.*

In their Motion to Compel, Plaintiffs ask the Court to disregard the attorney-client and work product privileges and require production of “all of JP Morgan’s Pioneer Litigation documents, including ... JP Morgan’s correspondence with its attorneys.” (Motion to Compel at 2.) Plaintiffs also asks the Court to compel the production of the “Pioneer Litigation settlement agreement;” ... “[c]ommunications between JP Morgan and/or its counsel and third parties;” and expert reports. As of the date of filing this Response, and contrary to the allegations in Plaintiffs’ Motion to Compel, JPMorgan has produced the Pioneer Litigation Settlement Agreement, the reports of JPMorgan’s experts, and all communications between JPMorgan or its attorneys and third parties or opposing counsel.<sup>3</sup> JPMorgan has only withheld documents and

---

<sup>1</sup> Examples of the emails that were produced are labeled DEFENDANTS 078694, 078909, 080002, 080222, and 127203. All of the foregoing materials were marked Confidential pursuant to the Agreed Protective Order entered November 14, 2011.

<sup>2</sup> Examples of the memoranda updates that were produced are labeled DEFENDANTS 007939-40, 007952-56, 008019-21, 008025-30, 056744-45, 056791-92. All of the foregoing materials were marked Confidential.

<sup>3</sup> The Settlement Agreement was produced labeled as DEFENDANTS 137748-137780. The expert reports were produced labeled as DEFENDANTS 137478-137714. Examples of the communications between JPMorgan or its attorneys and third parties or opposing counsel that were produced are labeled DEFENDANTS 126567-69, 125673-75, and 125681-96 (third parties) and DEFENDANTS 121035, 121751-53, and 136019-27 (opposing counsel). All of the foregoing materials were marked Confidential pursuant to the Agreed Protective Order entered November 14, 2011.

communications that are protected by the attorney-client and work product privileges.<sup>4</sup> JPMorgan has filed the affidavits of Corey Wehmeyer and Gary P. Aymes, which attest to the basis of the privileges claimed. The Court should deny the Motion to Compel.

### **Argument and Authorities**

Plaintiffs contend in the Motion to Compel that JPMorgan is obligated to produce the “complete litigation file” from the Pioneer Litigation, including “all work product and attorney-client communications” because (1) the requested documents and communications are relevant, and (2) JPMorgan’s claims of privilege are not grounds for withholding the information, or alternatively, (3) that the Court could alleviate JPMorgan’s confidentiality concerns by subjecting the information to the Agreed Protective Order already entered in the present litigation. Not only does the Motion to Compel misstate the facts regarding the documents JPMorgan has produced in this case, the Plaintiffs’ misapply well-established Supreme Court precedent, misconstrue the law, and improperly seek to discover privileged information by way of a protective order.

#### **A. JPMorgan Complied With Its Duty To Produce Relevant Non-Privileged Information**

Plaintiffs claim that the Pioneer Litigation file is discoverable because it is relevant to their allegations of breach of fiduciary duty and trust, fraud, and negligent misrepresentation. But that is a plainly incorrect statement of the law. A party may obtain discovery regarding “any matter that is not privileged and is relevant to the subject matter of the pending action.” TEX. R. CIV. P. 192.3(a) (emphasis added); *see also Ford Motor Co. v. Castillo*, 279 S.W.3d 656, 664 (Tex. 2009); *In re K.L. & J. Ltd. P’ship*, 336 S.W.3d 286, 290 (Tex. App.—San Antonio 2010,

---

<sup>4</sup> JPMorgan has located an expert report served by Pioneer in the Pioneer Litigation. Pioneer designated the report as “confidential” under a protective order. JPMorgan is very willing to produce that report once the Plaintiffs obtain Pioneer’s consent under the Pioneer Litigation protective order.

no pet.). Texas case law and the Rules of Civil Procedure are clear: in order for information to be discoverable, it must be non-privileged and relevant to the subject matter of the pending litigation. Because the information JPMorgan has withheld is protected by the attorney-client and/or work product privileges, it is not discoverable. TEX. R. CIV. P. 192.3(a).

In addition, and despite Plaintiffs' allegations to the contrary, JPMorgan has complied with the discovery rules by producing all relevant, non-privileged information regarding the Pioneer Litigation. JPMorgan produced the Pioneer Litigation Settlement Agreement, all of JPMorgan's expert reports from the Pioneer Litigation and of its non-privileged communications with third parties. Therefore, Plaintiffs' assertion that JPMorgan improperly withheld the "Pioneer Litigation settlement agreement, expert reports, [and] communications with opposing counsel" (Motion to Compel at 4-5) is simply incorrect.

## **B. JPMorgan Is Entitled To Assert Privilege**

### **1. Plaintiffs Ignore Valid Texas Supreme Court Precedent Established in *Huie***

The attorney-client privilege protects from disclosure confidential communications between a client and his or her attorney "made for the purpose of facilitating the rendition of professional legal services to the client . . . ." TEX. R. CIV. EVID. 503(b); *Huie v. DeShazo*, 922 S.W.2d 920, 922 (Tex. 1996). The privilege is intended to allow "unrestrained communication and contact between an attorney and client in all matters in which the attorney's professional advice or services are sought, without fear that these confidential communications will be disclosed . . . in *any* legal proceeding." *Huie*, 922 S.W.2d at 922 (quoting *West v. Solito*, 563 S.W.2d 240, 245 (Tex. 1978)) (emphasis added). It is well-established in Texas that notwithstanding a trustee's fiduciary duty to the beneficiaries of the trust, only the trustee is the client of the trustee's attorney. *Id.* at 921. Therefore, in a suit for breach of fiduciary duty

against the trustee, the beneficiaries are not entitled to discover communications between the trustee and his or her attorney that are protected by the attorney-client privilege. *Id.*

In *Huie*, the plaintiff-beneficiary sued the trustee alleging that the trustee mismanaged the trust, engaged in self-dealing, diverted business opportunities from the trust, and commingled and converted trust property. *Id.* at 922. The plaintiff sought to depose the trustee's attorney, but the attorney refused to answer any questions relating to the management of the trust, instead asserting both attorney-client and work product privileges. *Id.* The Texas Supreme Court ultimately held that the beneficiary was not entitled to discover any confidential communications between the trustee and the trustee's attorney. *Id.* at 925. In arriving at its ruling, the Court reasoned that "[w]ithout the privilege, trustees might be inclined to forsake legal advice, thus adversely affecting the trust, as disappointed beneficiaries could later pore over the attorney-client communications in second-guessing the trustee's actions." *Id.* at 924. The Court stated further that if the trustee and his attorney were not afforded the benefit of the privilege, then the trustee "might feel compelled to blindly follow counsel's advice, ignoring their own judgment and experience." *Id.*

This same rationale applies here. JPMorgan sought out the professional legal services of Cox Smith and, in addition to its own in-house attorneys, retained Cox Smith to handle the Pioneer Litigation for the Trustee. In other words, JPMorgan hired Cox Smith to represent it in carrying out its fiduciary duties. *See id.* at 925. As such, JPMorgan is entitled to assert the attorney-client privilege with respect to confidential communications made for the purpose of facilitating the rendition of professional legal services between JPMorgan or its representatives and its attorneys. TEX. R. CIV. EVID. 503(b); *Huie*, 922 S.W.2d at 925-26.

The attorney work product privilege protects from disclosure “material prepared or mental impressions developed in anticipation of litigation or for trial by or for a party or party’s representatives, including the party’s attorneys . . . employees, or agents.” TEX. R. CIV. P. 192.5(a)(1). The privilege also covers “communication[s] made in anticipation of litigation or for trial between a party and the party’s representatives or among a party’s representatives, including the party’s attorneys . . . employees, or agents.” *Id.* at (a)(2). The work product privilege extends beyond the litigation for which the work product was created such that materials prepared in anticipation of litigation are not only protected during the instant litigation but are also protected in subsequent unrelated litigation. *Owens-Corning Fiberglas Corp. v. Caldwell*, 818 S.W.2d 749, 750 (Tex. 1991); *National Tank Co. Brotherton*, 851 S.W.2d 193, 200 (Tex. 1993); *In re Baptist Hosps. of Southeast Tex.*, 172 S.W.3d 136, 144 (Tex. App.—Beaumont 2005, no pet.). With respect to the attorney work product privilege, the *Huie* court stated that “[t]he policy reasons supporting the attorney-client privilege in the context of the fiduciary-attorney relationship support even more strongly the work product privilege, as the latter protects the confidentiality of work prepared in anticipation of litigation.” *Id.* at 927.

In addition to the attorney-client privilege, JPMorgan asserts the attorney work product privilege with respect to a large portion of the documents and communications that Plaintiffs have requested. Many of the documents and communications in the Pioneer Litigation file consist of material prepared or mental impressions developed in anticipation of or during the Pioneer Litigation. Despite Plaintiffs’ claims to the contrary, these documents are covered by the work product privilege and, thus, JPMorgan asks that the Court deny Plaintiffs’ Motion to Compel.

## 2. Plaintiffs Misconstrue the Law In Their Attempts to Distinguish *Huie*

Plaintiffs attempt to distinguish *Huie* by pointing out that in *Huie*, the beneficiary sought to depose the trustee's attorney in a suit brought against the trustee, whereas in the instant litigation, Plaintiffs seek information relating to JPMorgan's representation in another lawsuit. (Dkt. \_\_\_ at 6.) The distinction is of no consequence. In *Huie*, the Texas Supreme Court arrived at its holding based on the unqualified right of a trustee to assert the attorney-client privilege with respect to "all matters in which the attorney's professional advice or services are sought, without fear that these confidential communications will be disclosed . . . in any legal proceeding." *Huie*, 922 S.W.2d at 922 (quoting *West v. Solito*, 563 S.W.2d 240, 245 (Tex. 1978)) (emphasis added). The Court was straightforward in its application of the privilege: "The *communications* between [the attorney and trustee] made confidentially and for the purpose of facilitating legal services are protected." *Id.* at 923-24 (emphasis in original).

Plaintiffs also argue that they should be entitled to discovery of the privileged information because "[n]o beneficiary could ever prove its trustee acted improperly in conducting prior litigation if the trustee could hide behind the veil of privilege." (Motion to Compel at 6.) The fact that an opposing party's access to privileged information might be useful in prosecuting its case, however, does not warrant circumventing the privilege itself. Further, the Plaintiffs' position is completely at odds with *Huie*, which rejected that notion that a trustee's fiduciary duty of disclosure automatically overrides any attorney-client privilege that might otherwise apply. *See Huie*, 922 S.W.2d at 923.

Finally, Plaintiffs rely on *Huie* to claim that JPMorgan is not entitled to assert the attorney-client privilege because the information at issue contains "material facts" that JPMorgan has a duty to disclose. (Motion to Compel at 7.) Plaintiffs' reliance on *Huie* for this proposition

is misplaced. The *Huie* court stated that a trustee who has knowledge of a material fact independently of his or her communication with an attorney must disclose the fact. *Huie*, 922 S.W.2d at 923. The Court did not go so far, however, as to say that the trustee's independent knowledge entitled the beneficiaries to discover every communication between the trustee and his or her attorney. *See id.* at 923-24. In fact, the Court stated that in its hypothetical scenario, in which a trustee had independent knowledge of a material fact, the beneficiaries would be entitled to depose the trustee about the material fact, but the attorney could not be compelled to disclose attorney-client information. *See id.* Here, the Plaintiffs have had the opportunity to depose several JPMorgan employees, including a corporate representative, regarding the Pioneer Litigation. Plaintiffs are not entitled to the communications between JPMorgan, its representatives, and its attorneys. *See id.*

**3. The Agreed Protective Order Does Not Apply To Information Protected From Disclosure Under A Claim Of Privilege.**

Plaintiffs' invocation of the Agreed Protective Order entered in this case as a possible means of alleviating JPMorgan's confidentiality concerns is, likewise, unavailing. The Agreed Protective Order at issue does not contemplate creating an alternative to claims of privilege. In addition, JPMorgan has withheld the information at issue on the basis of the attorney-client and work product privileges, not just confidentiality. As such, JPMorgan's assertions of privilege go beyond the scope of the Agreed Protective Order. *See Huie*, 922 S.W.2d at 924 ("We also disapprove of the [*Burton v. Cravey*] court's dicta that the trial court could, in its discretion, decline to apply the attorney-client privilege even if all the elements of Rule 503 were met.") As stated earlier, JPMorgan has produced all relevant, non-privileged information, much of it subject to the Agreed Protective Order that is in place in the present litigation. Plaintiffs'



allegation that JPMorgan is refusing to disclose information “under a blanket assertion of privilege” is simply wrong. Therefore, the Court should deny Plaintiffs’ Motion to Compel.

**CONCLUSION**

Plaintiffs have presented no basis for removing the trustee’s attorney-client and work product privileges. The Motion to Compel should be denied.

WHEREFORE, JPMorgan requests that Plaintiffs’ Motion to Compel be denied and requests all other relief this Court deems proper.

Respectfully submitted,

HORNBERGER SHEEHAN FULLER BEITER,  
WITTENBERG & GARZA INCORPORATED

Patrick K. Sheehan  
[psheehan@hsfblaw.com](mailto:psheehan@hsfblaw.com)  
State Bar No. 18175500  
Kevin M. Beiter  
[kbeiter@hsfblaw.com](mailto:kbeiter@hsfblaw.com)  
State Bar No. 02059065  
Rudy A. Garza  
[rugar@hsfblaw.com](mailto:rugar@hsfblaw.com)  
State Bar No. 07738200  
David Jed Williams  
[jwilliams@hsfblaw.com](mailto:jwilliams@hsfblaw.com)  
State Bar No. 21518060

The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
Telephone: (210) 271-1700  
Facsimile: (210) 271-1730

HUNTON & WILLIAMS LLP

By: /s/ John C. Eichman  
Charles A. Gall  
[cgall@hunton.com](mailto:cgall@hunton.com)  
State Bar No. 07281500  
John C. Eichman  
[jeichman@hunton.com](mailto:jeichman@hunton.com)  
State Bar No. 06494800  
Amy S. Bowen  
[abowen@hunton.com](mailto:abowen@hunton.com)  
State Bar No. 24028216

1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
Telephone: (214) 979-3000  
Facsimile: (214) 880-0011

**ATTORNEYS FOR DEFENDANT  
JPMORGAN CHASE BANK, N.A., AS  
TRUSTEE OF THE SOUTH TEXAS  
SYNDICATE TRUST**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on the following counsel of record via email on this 28th day of January, 2014.

John B. Massopust  
Matthew J. Gollinger  
Zelle Hofmann Voelbel & Mason LLP  
500 Washington Avenue South, Suite 5000  
Minneapolis, MN 55415  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)  
[mgollinger@zelle.com](mailto:mgollinger@zelle.com)

Michael S. Christian  
Zelle Hoffmann Voelbel & Mason LLP  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

James L. Drought  
Ian Bolden  
Drought Drought & Bobbitt, LLP  
112 E. Pecan Street, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)  
[itb@ddb-law.com](mailto:itb@ddb-law.com)

Richard Tinsman  
Sharon C. Savage  
Tinsman & Sciano, Inc.  
10107 McAllister Freeway  
San Antonio, Texas 78205  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

Steven J. Badger  
Zelle Hofmann Voelbel & Mason LLP  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zelle.com](mailto:sbadger@zelle.com)

George Spencer, Jr.  
Jeffrey J. Jowers  
Clemens & Spencer, P.C.  
112 E. Pecan St., Suite 1300  
San Antonio, Texas 78205  
[spencer@clemens-spencer.com](mailto:spencer@clemens-spencer.com)  
[jowersj@clemens-spencer.com](mailto:jowersj@clemens-spencer.com)

David R. Deary  
Jim L. Flegle  
Jeven R. Sloan  
Loewinsohn Flegle Deary, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)  
[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)  
[jevens@LFDlaw.com](mailto:jevens@LFDlaw.com)

Fred W. Stumpf  
Glast, Phillips & Murray  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

/s/ John C. Eichman  
John C. Eichman

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.,	§	IN THE DISTRICT COURT
Plaintiffs,	§	
	§	
V.	§	225TH JUDICIAL DISTRICT
	§	
JPMORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST	§	
and GARY P. AYMES,	§	
Defendants.	§	BEXAR COUNTY, TEXAS

**NOTICE OF FILING AFFIDAVIT OF GARY P. AYMES**

JPMORGAN CHASE BANK, N.A., as Trustee of the South Texas Syndicate Trust, files the Affidavit of Gary P. Aymes, attached hereto as Exhibit "1", in response to Plaintiffs' Motion to Compel the STS Tax Opinion prepared by Cox & Smith.

Respectfully submitted,

**HORNBERGER SHEEHAN FULLER BEITER  
WITTENBERG & GARZA INCORPORATED**  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
(210) 271-1700 Telephone  
(210) 271-1740 Fax

By: /s/ David Jed Williams  
Patrick K. Sheehan  
psheehan@hsfblaw.com  
State Bar No. 18175500  
Kevin M. Beiter  
kbeiter@hsfblaw.com  
State Bar No. 02059065  
Rudy A. Garza  
rugar@hsfblaw.com  
State Bar No. 07738200  
David Jed Williams  
jwilliams@hsfblaw.com  
State Bar No. 21518060

**ATTORNEYS FOR DEFENDANTS**

HUNTON & WILLIAMS LLP

Charles A. Gall

[cgall@hunton.com](mailto:cgall@hunton.com)

State Bar No. 07281500

John C. Eichman

[jeichman@hunton.com](mailto:jeichman@hunton.com)

State Bar No. 06494800

Amy S. Bowen

[abowen@hunton.com](mailto:abowen@hunton.com)

State Bar No. 24028216

**ATTORNEYS FOR DEFENDANT  
JPMORGAN CHASE BANK, N.A., AS  
TRUSTEE OF THE SOUTH TEXAS  
SYNDICATE TRUST**

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on the following counsel of record via the electronic service manager and/or by email on this 27<sup>th</sup> day of January, 2014:

Mr. George Spencer, Jr.  
Mr. Jeffrey J. Jowers  
CLEMENS & SPENCER  
112 East Pecan, Suite 1300  
San Antonio, Texas 78205  
[spencer@clemmens-spencer.com](mailto:spencer@clemmens-spencer.com)  
[jjowers@clemens-spencer.com](mailto:jjowers@clemens-spencer.com)

Mr. David R. Deary  
Mr. Jim L. Flegle  
Mr. Jeven R. Sloan  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)  
[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)  
[jevans@LFDlaw.com](mailto:jevans@LFDlaw.com)

Mr. James L. Drought  
Mr. Ian Bolden  
DROUGHT DROUGHT & BOBBITT, LLP  
112 East Pecan, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)  
[itb@ddb-law.com](mailto:itb@ddb-law.com)

Mr. Steven J. Badger  
Ms. Ashley Bennett Jones  
ZELLE HOFMANN VOELBEL & MASON  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zelle.com](mailto:sbadger@zelle.com)  
[ajones@zelle.com](mailto:ajones@zelle.com)

Mr. Richard Tinsman  
Ms. Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78216  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

Mr. John B. Massopust  
ZELLE HOFMANN VOELBEL & MASON  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)

Mr. Michael S. Christian  
ZELLE HOFMANN VOELBEL & MASON  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

Mr. Matthew J. Gollinger  
ZELLE HOFMANN VOELBEL & MASON  
500 Washington Avenue South, Suite 4000  
Minneapolis, MN 55415-1152  
[mgollinger@zelle.com](mailto:mgollinger@zelle.com)

Mr. Fred W. Stumpf  
GLAST, PHILLIPS & MURRAY  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

\_\_\_\_\_  
s/s David Jed Williams  
David Jed Williams

JOHN K. MEYER, ET. AL.

§  
§  
§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

VS.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

225<sup>TH</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**AFFIDAVIT OF GARY P. AYMES**

STATE OF TEXAS

§

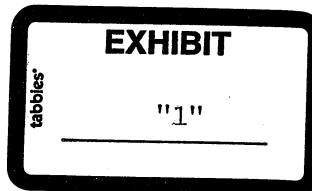
COUNTY OF BEXAR

§

BEFORE ME, the undersigned authority, on this day personally appeared Gary P. Aymes, who having been duly sworn, on his oath, stated as following:

1. "My name is Gary P. Aymes. I am over the age of 18 years and I am of sound mind and fully competent to make this Affidavit. I have personal knowledge of the statements made in this affidavit, and the statements in this affidavit are true and correct. I make this affidavit in support of Defendant J.P. Morgan Chase Bank, N.A.'s ("J.P. Morgan") response to Plaintiffs' Motion to Compel regarding Request for Production No. 2 contained in Plaintiffs' Sixth Request for Production, which requested a copy of the "STS Tax Opinion Cox & Smith prepared."

2. I am currently employed as an Executive Director of J.P. Morgan. I am a Senior Trust Officer with J.P. Morgan's Private Bank and have served in this capacity since 2011. I have been employed by J.P. Morgan or one of its predecessors since 1984. Prior to holding my current position, I served as a Vice President and was a Trust Advisor in J.P. Morgan's Private Bank. I was one of the individuals responsible for administering the South Texas Syndicate



Trust (the "Trust") when J.P. Morgan, as Trustee of the Trust, retained the law firm of Cox Smith Matthews, Inc. ("Cox Smith") seeking a tax opinion regarding the proper U.S. Federal Income tax classification of the Trust.

3. As a result of my job duties and responsibilities, I have personal knowledge regarding the process by which J. P. Morgan obtained the Cox Smith tax opinion which was withheld from production in this suit pursuant to the attorney-client privilege.

4. J.P. Morgan, in its capacity as Trustee of the Trust, retained Cox Smith because it sought Cox Smith's legal opinion regarding the proper U.S. federal income tax classification of the Trust.

5. Attached as Exhibit "A" to this affidavit is a true and correct copy of an excerpt from Defendants' Privilege Log, which was produced in this lawsuit (the "Privilege Log Excerpt"). The first item listed on the Privilege Log Excerpt (JPM-PRIV 000001-30) is the Cox Smith tax opinion, in the form of correspondence from Cox Smith dated October 6, 2010. This correspondence contains confidential communications between Cox Smith attorneys and J.P. Morgan as Trustee of the Trust made for the purpose of facilitating the rendition of legal services to J.P. Morgan.


6. The words "PRIVILEGED AND CONFIDENTIAL SUBJECT TO ATTORNEY/CLIENT PRIVILEGE..." appear across the top of the first page of the Cox Smith tax opinion, in all capital and bold letters.

7. Section IV, paragraph 7 of the Cox Smith tax opinion provides that the "opinion rendered herein is addressed solely to JPM as trustee of the STS and shall not be disclosed or otherwise distributed or relied upon by any other person or entity, including any beneficiary of STS, without our express prior written consent."

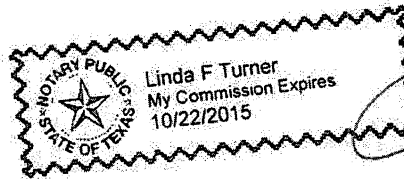
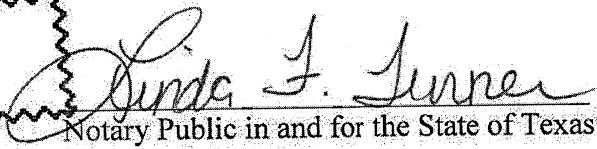


8. Cox Smith intended for the Cox Smith tax opinion to remain confidential and not to be disclosed. Cox Smith has not provided consent to J.P. Morgan to disclose the opinion.”

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Gary P. Aymes

Sworn and subscribed to before me by the said Gary P. Aymes on the 27 day of January 2014, to certify which witness my hand and seal of office.

  
  
\_\_\_\_\_  
Notary Public in and for the State of Texas

**EXHIBIT "A"**

CAUSE NO. 2010-CI-10977

JOHN K. MEYER, ET. AL.

VS.

JPMORGAN CHASE BANK, N.A.  
INDIVIDUALLY/CORPORATELY  
AND AS TRUSTEE OF THE SOUTH  
TEXAS SYNDICATE TRUST  
and GARY P. AYMES

§ § § § § § § § § §

IN THE DISTRICT COURT

225<sup>TH</sup> JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

DEFENDANTS' PRIVILEGE LOG

Date	Document Type	Pages	Bates No.	Author(s)	Recipient(s)	Subject Matter	Privilege(s) Claimed
October 6, 2010	Opinion from legal counsel regarding the proper U.S. federal income tax classification of STS	30	JPM-PRIV 1 - 30	Cox & Smith Incorporated/ William H. Lester Jr.	JPMorgan Chase Bank, N.A., Trustee South Texas Syndicate Trust	Legal opinion regarding the proper U.S. federal income tax classification of STS	Attorney/Client Work Product
June 4, 2002	Invoice for legal fees and expenses	1	JPM-PRIV 31	Cox & Smith Incorporated	JPMorgan Chase Bank, N.A., Trustee of the South Texas Syndicate Trust/Attn: John Flannery, Jr.	For legal services through 05/31/02 in connection with Tracker Oil & Gas Co. matters	Attorney/Client Work Product

Cause No. 2010-CI-10977

JOHN K. MEYER, ET AL.,	§	IN THE DISTRICT COURT
	§	
PLAINTIFFS,	§	
	§	
VS.	§	
	§	225TH JUDICIAL DISTRICT
	§	
JPMORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST AND	§	
GARY P. AYMES,	§	
	§	
DEFENDANTS.	§	BEXAR COUNTY, TEXAS

**NOTICE OF FILING OF AFFIDAVIT OF COREY WEHMEYER**

JPMorgan Chase Bank, N.A., as Trustee of the South Texas Syndicate Trust, files the Affidavit of Corey Wehmeyer, attached hereto as Exhibit 1, in response to Plaintiffs' Motion To Compel the Production of Documents Related To *JP MORGAN CHASE BANK, N.A., IN ITS CAPACITY AS TRUSTEE OF THE SOUTH TEXAS SYNDICATE TRUST V. PIONEER NATURAL RESOURCES USA, INC. AND EOG RESOURCES, INC.*

Respectfully submitted,

HORNBERGER SHEEHAN FULLER &  
BEITER, INC.

Patrick K. Sheehan  
[psheehan@hsfblaw.com](mailto:psheehan@hsfblaw.com)  
State Bar No. 18175500  
Kevin M. Beiter  
[kbeiter@hsfblaw.com](mailto:kbeiter@hsfblaw.com)  
State Bar No. 02059065  
Rudy A. Garza  
[rugar@hsfblaw.com](mailto:rugar@hsfblaw.com)  
State Bar No. 07738200  
David Jed Williams  
[jwilliams@hsfblaw.com](mailto:jwilliams@hsfblaw.com)  
State Bar No. 21518060

The Quarry Heights Building  
7373 Broadway, Suite 300  
San Antonio, Texas 78209  
Telephone: (210) 271-1700  
Facsimile: (210) 271-1730

HUNTON & WILLIAMS LLP

By: /s/ John C. Eichman  
Charles A. Gall  
[cgal@hunton.com](mailto:cgal@hunton.com)  
State Bar No. 07281500  
John C. Eichman  
[jeichman@hunton.com](mailto:jeichman@hunton.com)  
State Bar No. 06494800  
Amy S. Bowen  
[abowen@hunton.com](mailto:abowen@hunton.com)  
State Bar No. 24028216

1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
Telephone: (214) 979-3000  
Facsimile: (214) 880-0011

**ATTORNEYS FOR DEFENDANT  
JPMORGAN CHASE BANK, N.A., AS  
TRUSTEE OF THE SOUTH TEXAS  
SYNDICATE TRUST**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served on the following counsel of record via the electronic service manager and/or by email on this 22nd day of January, 2014.

John B. Massopust  
Matthew J. Gollinger  
Zelle Hofmann Voelbel & Mason LLP  
500 Washington Avenue South, Suite 5000  
Minneapolis, MN 55415  
[jmassopu@zelle.com](mailto:jmassopu@zelle.com)  
[mgollinger@zelle.com](mailto:mgollinger@zelle.com)

Michael S. Christian  
Zelle Hoffmann Voelbel & Mason LLP  
44 Montgomery Street, Suite 3400  
San Francisco, California 94104  
[mchristian@zelle.com](mailto:mchristian@zelle.com)

James L. Drought  
DROUGHT DROUGHT & BOBBITT, LLP  
112 E. Pecan Street, Suite 2900  
San Antonio, Texas 78205  
[jld@ddb-law.com](mailto:jld@ddb-law.com)

Richard Tinsman  
Sharon C. Savage  
TINSMAN & SCIANO, INC.  
10107 McAllister Freeway  
San Antonio, Texas 78205  
[rtinsman@tsslawyers.com](mailto:rtinsman@tsslawyers.com)  
[ssavage@tsslawyers.com](mailto:ssavage@tsslawyers.com)

Steven J. Badger  
Ashley Bennett Jones  
Zelle Hofmann Voelbel & Mason LLP  
901 Main Street, Suite 4000  
Dallas, Texas 75202-3975  
[sbadger@zell.com](mailto:sbadger@zell.com)

George Spencer, Jr.  
Jeffrey J. Jowers  
CLEMENS & SPENCER, P.C.  
112 E. Pecan St., Suite 1300  
San Antonio, Texas 78205  
[spencer@clemens-spencer.com](mailto:spencer@clemens-spencer.com)  
[jjowers@clemens-spencer.com](mailto:jjowers@clemens-spencer.com)

David R. Deary  
Jim L. Flegle  
Jeven R. Sloan  
LOEWINSOHN FLEGLE DEARY, L.L.P.  
12377 Merit Drive, Suite 900  
Dallas, Texas 75251  
[davidd@LFDlaw.com](mailto:davidd@LFDlaw.com)  
[jimf@LFDlaw.com](mailto:jimf@LFDlaw.com)  
[jevans@LFDlaw.com](mailto:jevans@LFDlaw.com)

Fred W. Stumpf  
GLAST, PHILLIPS & MURRAY  
Nine Greenway Plaza, Suite 3100  
Houston, Texas 77046  
[fstumpf@gpm-law.com](mailto:fstumpf@gpm-law.com)

/s/ John C. Eichman

\_\_\_\_\_  
John C. Eichman

JOHN K. MEYER, ET AL.,	§	IN THE DISTRICT COURT
	§	
PLAINTIFFS,	§	
	§	
VS.	§	
	§	225TH JUDICIAL DISTRICT
	§	
JPMORGAN CHASE BANK, N.A.	§	
INDIVIDUALLY/CORPORATELY	§	
AND AS TRUSTEE OF THE SOUTH	§	
TEXAS SYNDICATE TRUST AND	§	
GARY P. AMES,	§	
	§	
DEFENDANTS.	§	BEXAR COUNTY, TEXAS

**AFFIDAVIT OF COREY WEHMEYER**

**THE STATE OF TEXAS** §  
§  
**COUNTY OF BEXAR** §

BEFORE ME, the undersigned authority, on this day personally appeared Corey Wehmeyer, who, being duly sworn on his oath, stated the following:

1. My name is Corey Wehmeyer. I am over the age of 18 years and I am of sound mind. I have personal knowledge of the statements made in this Affidavit, and the statements in this Affidavit are true and correct. I am fully competent to testify regarding materials withheld under the attorney-client and work-product privileges in the case styled *JP Morgan Chase Bank, N.A., In Its Capacity as Trustee of the South Texas Syndicate Trust v. Pioneer Natural Resources USA, Inc. and EOG Resources, Inc.* (the "Pioneer Litigation").

2. This affidavit is made and submitted in response to Plaintiff's Motion to Compel the Production of Documents Related to *JP Morgan Chase Bank, N.A., In Its Capacity as Trustee of the South Texas Syndicate Trust v. Pioneer Natural Resources USA, Inc. and EOG Resources, Inc.*

3. I am a shareholder at the law firm of Cox Smith Matthews Incorporated (“Cox Smith”) in San Antonio and I was one of the attorneys that represented Defendant JP Morgan Chase Bank, N.A. (“JPMorgan”) in the Pioneer Litigation.

4. During the Pioneer Litigation, JPMorgan withheld certain documents based on claims and assertions of the attorney-client privilege and attorney work-product protection, as detailed in the attached privilege log. (*See* JPMorgan Chase Bank, N.A., in its Capacity as Trustee of the South Texas Syndicate Trust’s Privilege Log in Connection with the Litigation Styled: *JP Morgan Chase Bank, N.A., In Its Capacity as Trustee of the South Texas Syndicate Trust v. Pioneer Natural Resources USA, Inc. and EOG Resources, Inc.*, attached as Exhibit 1) (the “Privilege Log”).

5. The attached Privilege Log contains particularized descriptions of the materials withheld in the Pioneer Litigation, and it has been updated to include materials withheld in connection with the above-captioned litigation on the basis of attorney-client privilege, attorney work-product protection and trade secret/confidentiality.

6. Among other things, the communications and documents listed in the Privilege Log include correspondence and legal memoranda sent between Defendant JPMorgan’s employees and its counsel leading up to and throughout the course of the Pioneer Litigation.

7. In withholding documents in connection with the Pioneer Litigation, it was our assessment and determination that the communications and documents listed in the Privilege Log were created in order to facilitate the provision of legal advice relating to the Pioneer Litigation or previous transactions and matters concerning leases and lands at issue in the Pioneer Litigation.



8. Many of the communications and documents listed in the Privilege Log contain legal research, analysis, strategy, and/or advice regarding JPMorgan's claims that the defendants in the Pioneer Litigation failed to develop two specific leases known as the Cullen Leases.


9. Many of the communications and documents listed in the Privilege Log contain historical legal research, analysis, strategy, and/or advice regarding the Cullen Leases that predated Pioneer's ownership/operatorship of the Cullen Leases.

10. Other communications and documents listed in the Privilege Log contain legal research, analysis, strategy, and/or advice regarding legal issues implicated by certain surface owners on or around the leases and lands at issue in the Pioneer Litigation.

Further affiant sayeth not.

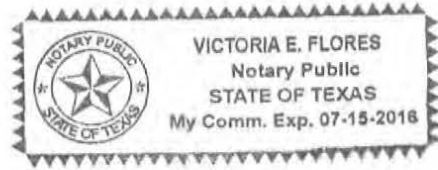
  
Corey Wehmeyer

Sworn and subscribed to before me by the said Corey Wehmeyer on the 25<sup>th</sup> day of January 2014, to certify which witness my hand and seal of office.

  
Notary Public in and for the State of Texas

My commission expires:

July 15, 2016



# EXHIBIT A

**JPMorgan Chase Bank, N.A., in its Capacity as Trustee  
of the South Texas Syndicate Trust's Privilege Log in Connection with the Litigation Styled:**

CAUSE NO. 09-04-00036-CVL

JPMORGAN CHASE BANK, N.A., IN  
ITS CAPACITY AS TRUSTEE OF THE  
SOUTH TEXAS SYNDICATE TRUST,

IN THE DISTRICT COURT OF

§ § § § § § § § § § § § § § § §

Plaintiff,

vs.

PIONEER NATURAL  
RESOURCES USA, INC. AND  
EOG RESOURCES, INC.,

LA SALLE COUNTY, TEXAS

Defendants.

218<sup>th</sup> JUDICIAL DISTRICT

No.	Date	Author	Recipient	CC:	Description	Privilege
1	01/13/1953	Herbert Croft, Vice President and Trust Officer Alamo National Bank	Boyle, Wheeler, Gresham & Davis (attorneys)	None	Correspondence requesting legal advice in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
2	01/14/1953	Richard T. Davis (attorney)	Herbert Croft, Vice President and Trust Officer Alamo National Bank	None	Correspondence including legal advice in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product
3	03/19/1953	E.P. Smith, Trust Officer, Alamo National Bank	William T. Beard, Vice President of Alamo National Bank	None	Office Memorandum attaching draft memorandum from E.P. Smith to Officers' Trust Committee concerning lease development and legal opinion from R.N. Gresham (attorney) regarding same	Attorney-client privilege; attorney work product
4	03/19/1953	William T. Beard, Jr., Vice President of Alamo National Bank	E.P. Smith, Trust Officer, Alamo National Bank	None	Memorandum regarding strategy in Cullen Lease development	Attorney work product
5	03/27/1959	Elwood Cluck (attorney)	Niles Chubb, Trust Officer, Alamo National Bank	None	Correspondence including legal opinion regarding division order in connection with Cullen Leases	Attorney-client privilege; attorney work product
6	04/27/1959	Elwood Cluck (attorney)	Niles Chubb, Trust Officer Alamo National Bank	None	Correspondence including legal opinion regarding division order in connection with Cullen Leases	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
7	03/19/1962	Niles Chubb, Vice President and Trust Officer Alamo National Bank	File/Elwood Cluck (attorney)	None	Memorandum regarding development of Cullen Leases	Attorney-client privilege; attorney work product
8	03/19/1962	Niles Chubb, Vice President and Trust Officer Alamo National Bank	Elwood Cluck (attorney)	None	Correspondence regarding development of Cullen Leases and enclosing memorandum to file dated 3/19/1962	Attorney-client privilege; attorney work product
9	03/30/1962	Catherine Steele, Trust Officer	Elwood Cluck (attorney)	None	Correspondence regarding Cullen Leases	Attorney-client privilege; attorney work product
10	01/08/1968	Catherine Steele, Trust Officer	Files	None	Memorandum regarding inquiry in connection with release of Cullen Leases	Attorney work product; consulting expert privileges
11	09/24/1968	Niles Chubb, Vice President and Trust Officer, Alamo National Bank	Elwood Cluck (attorney)	None	Handwritten notes on 9/24/1968 correspondence from David Dale/Quintana Petroleum to Niles Chubb	Attorney-client privilege; attorney work product
12	09/26/1968	Thomas Bates, Trust Dept Alamo National Bank	Elwood Cluck (attorney)	None	Correspondence requesting legal advice in connection with Cullen Leases	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
13	09/27/1968	Elwood Cluck (attorney)	Thomas Bates, Trust Dept Alamo National Bank	None	Correspondence including legal advice in connection with Cullen Leases	Attorney-client privilege; attorney work product
14	04/04/1974	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo national Bank	None	Correspondence regarding development of Cullen Leases	Attorney-client privilege; attorney work product
15	03/19/1975	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence requesting legal advice in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product
16	04/04/1975	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum including legal analysis of failure to develop Cullen Leases, attaching draft letter to Quintana Petroleum and enclosing attorney notes on Cullen Lease excerpts	Attorney-client privilege; attorney work product
17	06/03/1975	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum concerning failure to develop Cullen Leases	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
18	06/30/1975	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Memorandum requesting legal advice in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product
19	07/02/1975	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Correspondence including legal analysis of failure to develop Cullen Leases	Attorney-client privilege; attorney work product
20	09/24/1975	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum enclosing draft correspondence to Quintana Petroleum regarding development of Cullen Leases	Attorney-client privilege; attorney work product
21	09/30/1975	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum including legal analysis in connection with enclosed 09/29/1975 correspondence from JM Trotter/Quintana Petroleum to Richard Davis concerning lease status	Attorney-client privilege; attorney work product
22	01/02/1976	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence regarding legal strategy in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
23	01/26/1977	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence regarding development of Cullen Leases and enclosing 1/25/1977 letter from William Locke/Everest Exploration to John Flannery, Jr. concerning lease status	Attorney-client privilege; attorney work product
24	02/01/1977	Bill Spice, Consulting Geologist	John Flannery, Jr., Vice President and Trust Officer, Alamo National Bank	None	Correspondence regarding development of Cullen Leases	Attorney work product; consulting expert privileges
25	03/18/1977	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum enclosing 3/16/1977 letter from Marvin Morris/Quintana Petroleum regarding status of development of Cullen Leases	Attorney-client privilege; attorney work product
26	05/04/1977	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum including legal analysis regarding gas sales prices and attaching 4/22/1977 correspondence from Donald Keller/Quintana Petroleum to Richard Davis regarding pricing	Attorney-client privilege; attorney work product



<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
27	06/17/1977	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence requesting legal advice in connection with Cullen Leases	Attorney-client privilege; attorney work product
28	06/21/1977	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Correspondence including legal opinion in connection with Cullen Leases	Attorney-client privilege; attorney work product
29	09/19/1977	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum including legal strategy in connection with development of Cullen Leases	Attorney-client privilege; attorney work product
30	09/20/1977	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Bill Spice, Consulting Geologist	Richard Davis (attorney)	Correspondence regarding development of Cullen Leases	Attorney-client privilege; attorney work product; consulting expert privilege
31	09/23/1977	Bill Spice, Consulting Geologist	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	Correspondence regarding drilling activities on Cullen Leases	Attorney-client privilege; attorney work product; consulting expert privilege

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
32	02/02/1978	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Correspondence regarding legal strategy in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product
33	02/06/1978	John Flannery, Jr., Vice President and Trust Officer, Alamo National Bank	Bill Spice, Consulting Geologist	None	Correspondence regarding development of Cullen Leases	Attorney-client privilege; attorney work product
34	02/06/1978	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	Bill Spice, Consulting Geologist	Correspondence regarding legal strategy in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product
35	02/15/1978	Bill Spice, Consulting Geologist	John Flannery, Jr., Vice President and Trust Officer, Alamo National Bank	None	Correspondence regarding development of Cullen Leases	Attorney work product; consulting expert privilege
36	11/10/1978	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Correspondence including legal advice in connection with Cullen Leases and enclosing correspondence dated 11/7/1978 from Marvin Morris/Quintana Petroleum concerning - Ranch status	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
37	04/09/1979	John Flannery, Jr., Vice President and Trust Officer, Alamo National Bank	Bill Spice, Consulting Geologist	None	Correspondence regarding development of Cullen Leases	Attorney work product; consulting expert privilege
38	04/09/1979	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence regarding development of Cullen Leases	Attorney-client privilege; attorney work product
39	08/04/1983	Grey Dresser (landman consultant)	John Flannery, Jr., Vice President and Senior Trust Officer Alamo National Bank	None	Letter report concerning development and status of Cullen Leases	Attorney-work product; consulting expert privilege
40	08/20/1984	John Flannery, Jr., Vice President and Senior Trust Officer Alamo National Bank	Richard Davis (attorney) and Gail Barry (geologist)	None	Correspondence requesting legal advice in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product
41	05/10/1985	John Flannery, Jr., Vice President and Senior Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence requesting legal advice in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
42	07/11/1985	John Flannery, Jr., Vice President and Senior Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence requesting legal advice in connection with Cullen Leases and attaching 7/9/1985 letter from John L. Sullivan to John Flannery, Jr.	Attorney-client privilege; attorney work product
43	07/12/1985	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum including legal strategy in connection with Cullen Leases	Attorney-client privilege; attorney work product
44	04/28/1986	Richard Davis (attorney)	John Flannery, Jr., Vice President and Trust Officer Alamo National Bank	None	Memorandum regarding Cullen Leases and attaching 4/25/1986 letter from Marvin H. Morris/Quintana Petroleum to Richard Davis concerning lease status and attaching plats	Attorney-client privilege; attorney work product
45	12/11/1987	John Flannery, Jr., Vice President and Senior Trust Officer Alamo National Bank	Richard Davis (attorney)	None	Correspondence requesting legal advice in connection with development of Cullen Leases and enclosing 12/9/1987 letter from Pamela J. Anderson/Hawn Brothers to John Flannery	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
46	12/15/1987	Richard Davis (attorney)	John Flannery, Jr., Vice President and Senior Trust Officer Alamo National Bank	None	Correspondence including legal analysis in connection with development of Cullen Leases	Attorney-client privilege; attorney work product
47	09/13/1992	Joe Finger, Consulting Geologist	John Flannery, Jr., Trust Officer, Ameritrust Bank	None	Correspondence regarding lease options near, and development on, Cullen Leases	Attorney work product; consulting expert privilege
48	11/25/1992	Paul Smith (attorney)	John Flannery, Jr., Vice President, Ameritrust Texas	None	Correspondence including legal analysis in connection with option agreement	Attorney-client privilege; attorney work product
49	01/06/1995	John Flannery, Jr., Vice President and Senior Trust Officer Alamo National Bank	Paul Smith (attorney)	None	Memorandum concerning Kenley lawsuit involving surface dispute on Cullen Lease acreage and attaching 1/3/1995 letter from Kirk Briggs/Quintana Petroleum to Flannery	Attorney-client privilege; attorney work product
50	07/10/1995	John Flannery, Jr., Vice President and Trust Officer, Texas Commerce Bank	Joe Finger, Consulting Geologist	None	Memorandum regarding production from Cullen Leases	Attorney work product; consulting expert privilege

No.	Date	Author	Recipient	CC:	Description	Privilege
51	7/10/1995	John Flannery, Jr., Vice President and Trust Officer, Texas Commerce Bank	Joe Finger, Consulting Geologist	None	Memorandum requesting information in connection with development of Cullen Leases	Attorney work product; consulting expert privilege
52	7/25/1995	Joe Finger, Consulting Geologist	John Flannery, Jr., Vice President and Trust Officer, Texas Commerce Bank	None	Report regarding development of Cullen Leases	Attorney work product; consulting expert privilege
53	08/20/1999	John Flannery, Jr., Vice President Chase Bank	Paul Smith (attorney)	None	Memorandum regarding Cullen Leases	Attorney-client privilege; attorney work product
54	08/20/1999	John Flannery, Jr., Vice President, MBank Alamo	Paul Smith (attorney)	None	Memorandum concerning Cullen Leases and enclosing 8/17/1999 email correspondence from Kirk Briggs/Quintana to Gray Childress, Tom Liebsch, Ronnie Roth, Roger Dixon, Mike Trotter, Ron Novotny, Georgeanna Bragg, Dan Lewis, Chis Sisk, and John Flannery, Jr. concerning lawsuit settlement	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
55	11/16/1999	John Flannery, Jr, Vice President Chase Bank	Paul Smith (attorney)	Joe Finger, Consulting Geologist	Memorandum requesting legal assistance in connection with failure to develop Cullen Leases	Attorney-client privilege; attorney work product
56	01/14/2000	John Flannery, Jr, Vice President Chase Bank	Paul Smith (attorney)	None	Memorandum providing information requested to render legal opinion in connection with Cullen Leases	Attorney-client privilege; attorney work product
57	01/19/2000	Paul Smith (attorney)	John Flannery, Jr., Vice President, Texas Commerce Bank	None	Correspondence enclosing draft correspondence to Quintana Petroleum regarding Cullen Leases	Attorney-client privilege; attorney work product
58	01/21/2000	Paul Smith (attorney)	John Flannery, Jr., Vice President, Texas Commerce Bank	None	Correspondence enclosing draft correspondence to Swift Energy	Attorney-client privilege; attorney work product
59	02/04/2000	Paul Smith (attorney)	John Flannery, Jr., Vice President, Chase Bank	None	Facsimile enclosing 1/31/2000 correspondence from Kirk Briggs/Quintana Petroleum to Paul Smith concerning lease request	Attorney-client privilege; attorney work product
60	06/15/2000	Paul Smith (attorney)	John Flannery, Jr., Vice President, Chase Bank	None	Facsimile enclosing draft correspondence to Quintana Petroleum	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
61	07/21/2000	Paul Smith (attorney)	John Flannery, Jr., Vice President, Chase Bank	Peggy Sullivan (attorney)	Correspondence including legal issues in connection with failure to develop Cullen Leases, including 7/20/2000 memorandum from Paul Smith to Summer Associate Attorney and 6/27/2000 letter from Paul Smith to John Flannery, Jr. regarding Cullen Leases	Attorney-client privilege; attorney work product
62	08/08/2000	Paul Smith (attorney)	John Flannery, Jr., Vice President, Chase Bank	Peggy Sullivan (attorney)	Correspondence enclosing legal analysis regarding failure to develop Cullen Leases, including 8/1/2000 Legal Memorandum authored by Andrew Sherwood (summer associate attorney)	Attorney-client privilege; attorney work product
63	08/25/2000	Paul Smith (attorney)	Joe Finger, Consulting Geologist	John Flannery, Jr., Chase Manhattan Bank Peggy Sullivan (attorney)	Correspondence enclosing August 21, 2000 correspondence from Quintana Petroleum	Attorney-client privilege; attorney work product



<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
64	09/15/2000	John Flannery, Jr., Vice President, Chase Global Private Bank	Paul Smith (attorney), Joe Finger, Consulting Geologist	None	Memorandum concerning Quintana Petroleum operatorship of Cullen Leases	Attorney-client privilege; attorney work product; and consulting expert privilege
65	10/23/2000	John Flannery, Jr., Chase Global Private Bank	Paul Smith (attorney), Joe Finger, Consulting Geologist	None	Memorandum regarding leasing of Cullen acreage and enclosing 10/20/2000 letter from Fred Wernli, Jr./Wernli Exploration to John Flannery concerning lease possibilities and attaching plats	Attorney-client privilege; attorney work product; and consulting expert privilege
66	04/19/2001	John Flannery, Jr., Trust Officer, Chase Bank	File	Paul Smith (attorney), Joe Finger, Consulting Geologist	Memorandum concerning development of Cullen Leases	Attorney-client privilege; attorney work product; and consulting expert privilege
67	06/07/2001	John Flannery, Jr., Trust Officer, Chase Bank	Paul Smith (attorney), Joe Finger, Consulting Geologist	None	Memorandum regarding development of Cullen Leases	Attorney-client privilege; attorney work product; and consulting expert privilege

No.	Date	Author	Recipient	CC:	Description	Privilege
68	08/08/2001	John Flannery, Jr., Trust Officer, Chase Bank	Paul Smith (attorney), Joe Finger, Consulting Geologist	None	Memorandum concerning development of Cullen Leases	Attorney-client privilege; attorney work product; and consulting expert privilege
69	03/14/2003	Joe Finger, Consulting Geologist	John Flannery, Jr., Trust Officer, Chase Bank	None	Research regarding development of Cullen Leases	Attorney work product; consulting expert privilege
70	09/19/2008 (9:43 a.m.)	Stan Coddou (Petrohawk)	Patricia Schultz-Ormond (JPMorgan)	J. Steven Stewart (attorney), Howard Isbell (Petrohawk)	Email correspondence regarding dispute with surface owners, includes email string of emails #71-79	Attorney-client privilege; attorney work product
71	09/19/2008 (9:38 a.m.)	J. Steven Stewart (attorney)	Stan Coddou (Petrohawk), Howard Isbell (Petrohawk), Thomas Schleier (Petrohawk), Gregg Robertson (First Rock)	Charles Cusack (Petrohawk)	Email correspondence regarding dispute with surface owners, includes email string of emails #72-79	Attorney-client privilege; attorney work product
72	09/19/2008 (9:28 a.m.)	Stan Coddou (Petrohawk)	Howard Isbell (Petrohawk), Thomas Schleier (Petrohawk), Gregg Robertson (First Rock)	J. Steven Stewart (attorney), Charles Cusack (Petrohawk)	Email correspondence regarding dispute with surface owners, includes email string of emails #73-79	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
73	09/19/2008 (9:27 a.m.)	Howard Isbell (Petrohawk)	Stan Coddou (Petrohawk), Thomas Schleier (Petrohawk), Gregg Robertson (First Rock)	J. Steven Stewart (attorney), Charles Cusack (Petrohawk)	Email correspondence regarding dispute with surface owners, includes email string of emails #74- 79	Attorney-client privilege; attorney work product
74	09/19/2008 (9:26 a.m.)	Stan Coddou (Petrohawk)	Howard Isbell (Petrohawk), Thomas Schleier (Petrohawk), Gregg Robertson (First Rock)	J. Steven Stewart (attorney), Charles Cusack (Petrohawk)	Email correspondence regarding dispute with surface owners, includes email string of emails #75- 79	Attorney-client privilege; attorney work product
75	09/19/2008 (9:14 a.m.)	Howard Isbell (Petrohawk)	Stan Coddou (Petrohawk), Thomas Schleier (Petrohawk), Gregg Robertson (First Rock)	J. Steven Stewart (attorney)	Email correspondence regarding dispute with surface owners, includes email string of emails #76- 79	Attorney-client privilege; attorney work product
76	09/19/2008 (9:10 a.m.)	Stan Coddou (Petrohawk)	Howard Isbell (Petrohawk), Thomas Schleier (Petrohawk), Gregg Robertson (First Rock)	J. Steven Stewart (attorney)	Email correspondence regarding dispute with surface owners, includes email string of emails #77- 79	Attorney-client privilege; attorney work product
77	09/19/2008 (8:49 a.m.)	Howard Isbell (Petrohawk)	Stan Coddou (Petrohawk)	J. Steven Stewart (attorney)	Email correspondence regarding dispute with surface owners, includes email string of emails #78- 79	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
78	09/18/2008 (6:27 p.m.)	Stan Coddou (Petrohawk)	Howard Isbell (Petrohawk), Thomas Schleier (Petrohawk), Gregg Robertson (First Rock)	None	Email correspondence regarding dispute with surface owners, includes email string of email #79	Attorney work product
79	09/18/2008 (6:17 p.m.)	J. Steven Stewart (attorney)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners	Attorney-client privilege; attorney work product
80	09/12/2008	Patricia Schultz- Ormond (JPMorgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners	Attorney work product
81	09/18/2008 (6:29 p.m.)	Stan Coddou (Petrohawk)	Patricia Shultz- Ormond (JPMorgan)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of email #82, below	Attorney work product
82	09/18/2008 (5:59 p.m.)	Patricia Shultz- Ormond (JPMorgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners	Attorney work product
83	09/18/2008 (6:29 p.m.)	Stan Coddou (Petrohawk)	Patricia Shultz- Ormond (JPMorgan)	None	Read receipt of email regarding dispute with surface owners	Attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
84	09/18/2008 (9:11 a.m.)	Stan Coddou (Petrohawk)	Bob Berteau (Petrohawk), Chris Morro (Petrohawk), Howard Isbell (Petrohawk), Gregg Robertson (First Rock), Tom Cockburn (attorney), Charles Latch (Petrohawk), J. Steven Stewart (attorney), David Elkouri (attorney), Patricia Schultz- Ormond (JPMorgan)	None	Email correspondence regarding dispute with surface owners and legal action; includes email string consisting of emails #85-93, below	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
85	09/18/2008 (9:09 a.m.)	Bob Berteau (Petrohawk)	Stan Coddou (Petrohawk), Chris Morro (Petrohawk), Howard Isbell (Petrohawk), Gregg Robertson (First Rock), Tom Cockburn (attorney), Charles Latch (Petrohawk), J. Steven Stewart (attorney), David Elkouri (attorney), Patricia Schultz-Ormond (JPMorgan)	Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk), Gary Gilbert (Petrohawk)	Email correspondence regarding dispute with surface owners and legal action; includes email string consisting of emails #86-93, below	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
86	09/18/2008 (7:39 a.m.)	Stan Coddou (Petrohawk)	Chris Morro (Petrohawk), Howard Isbell (Petrohawk), Gregg Robertson (First Rock), Tom Cockburn (attorney), Charles Latch (Petrohawk), J. Steven Stewart (attorney), David Elkouri (attorney), Patricia Schultz- Ormond (JPMorgan)	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and legal opinion regarding surface rights; includes email string consisting of emails #87-93, below	Attorney-client privilege; attorney work product
87	09/16/2008 (1:32 p.m.)	Chris Morro (Petrohawk)	Howard Isbell (Petrohawk), Stan Coddou (Petrohawk), Gregg Robertson (First Rock), Tom Cockburn (attorney), Charles Latch (Petrohawk), J. Steven Stewart (attorney)	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners; includes email string consisting of emails #88-93, below	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
88	09/16/2008 (1:05 p.m.)	Howard Isbell (Petrohawk)	Stan Coddou (Petrohawk), Gregg Robertson (First Rock), Tom Cockburn (attorney), Chris Morro (Petrohawk), Charles Latch (Petrohawk), J. Steven Stewart (attorney)	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and proposed legal action; includes email string consisting of emails #89- 93, below	Attorney-client privilege; attorney work product
89	09/16/2008 (11:11 a.m.)	Stan Coddou (Petrohawk)	Howard Isbell (Petrohawk), Gregg Robertson (First Rock), Tom Cockburn (attorney), Charles Latch (Petrohawk), Charles Morro (Petrohawk), J. Steven Stewart (attorney)	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and proposed legal action; includes email string consisting of emails #90- 93, below	Attorney-client privilege; attorney work product



No.	Date	Author	Recipient	CC:	Description	Privilege
90	09/16/2008 (10:47 a.m.)	Howard Isbell (Petrohawk)	Stan Coddou (Petrohawk), Gregg Robertson (First Rock) Tom Cockburn (attorney), Chris Morro (Petrohawk), Charles Latch (Petrohawk)	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and proposed legal action; includes email string consisting of emails #91- 93, below	Attorney-client privilege; attorney work product
91	09/15/2008 (7:22 p.m.)	Stan Coddou (Petrohawk)	Howard Isbell (Petrohawk), Gregg Robertson (First Rock), Tom Cockburn (attorney), Charles Latch (Petrohawk), Charles Morro (Petrohawk),	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and proposed legal action; includes email string consisting of emails #92- 93, below	Attorney-client privilege; attorney work product
92	09/15/2008 (7:17 p.m.)	Gregg Robertson (First Rock)	Stan Coddou (Petrohawk), Howard Isbell (Petrohawk), Tom Cockburn (attorney), Charles Latch (Petrohawk), Charles Morro (Petrohawk)	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and proposed legal action; includes email string consisting of email #93, below	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
93	09/15/2008 (6:46 p.m.)	Tom Cockburn (attorney)	Stan Coddou (Petrohawk), Gregg Robertson (First Rock), Howard Isbell (Petrohawk, Charles Latch (Petrohawk), Charles Morro (Petrohawk),	Bob Bertreau (Petrohawk), Ernie P. Fontenot (Petrohawk), Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and proposed legal action	Attorney-client privilege; attorney work product
94	09/20/2008 (9:46 a.m.)	Stan Coddou (Petrohawk)	J. Steven Stewart (attorney), Thomas Schleier (Petrohawk), Tom Cockburn (attorney)	Patricia Schultz- Ormond (JPMorgan), Howard Isbell (Petrohawk)	Email correspondence regarding dispute with surface owners and proposed legal action, includes email string consisting of emails 95-99, below and email from George Person	Attorney-client privilege; attorney work product
95	09/19/2008 (5:28 p.m.)	J. Steven Stewart (attorney)	Stan Coddou (Petrohawk), Thomas Schleier (Petrohawk), Tom Cockburn (attorney)	None	Email correspondence regarding dispute with surface owners and proposed legal action, includes email string consisting of emails 96-99, below and email from George Person	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
96	09/20/2008 (10:08 a.m.)	Stan Coddou (Petrohawk)	J. Steven Stewart (attorney), Thomas Schleier (Petrohawk)	Howard Isbell (Petrohawk), Chris Morro (Petrohawk), Charles Latch (Petrohawk), Patricia Schultz- Ormond (JPMorgan)	Email correspondence regarding dispute with surface owners and proposed legal action, includes email string consisting of emails 97-99, below and email from George Person	Attorney-client privilege; attorney work product
97	09/20/2008 (9:57 a.m.)	J. Steven Stewart (attorney)	Stan Coddou (Petrohawk), Thomas Schleier (Petrohawk)	None	Email correspondence regarding dispute with surface owners and proposed legal action, includes email string consisting of emails 98-99, below and email from George Person	Attorney-client privilege; attorney work product
98	09/20/2008 (9:47 a.m.)	Stan Coddou (Petrohawk)	Thomas Schleier (Petrohawk), J. Steven Stewart (attorney)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of email 99, below and email from George Person	Attorney-client privilege; attorney work product
99	09/19/2008 (8:42 p.m.)	Thomas Schleier (Petrohawk)	J. Steven Stewart (attorney), Stan Coddou (Petrohawk)	None	Email correspondence forwarding 09/19/2008 email from George Person	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
100	09/22/2008 (7:56 a.m.)	Stan Coddou (Petrohawk)	Patricia Schultz- Ormond (JPMorgan)	Howard Isbell (Petrohawk), J. Steven Stewart (attorney), Tom Cockburn (attorney), Thomas Schleier (Petrohawk), David Roth (attorney)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 101-102 below, and email 95 above	Attorney-client privilege; attorney work product
101	09/22/2008 (7:51 p.m.)	Patricia Schultz- Ormond (JPMorgan)	Stan Coddou (Petrohawk)	Howard Isbell (Petrohawk), J. Steven Stewart (attorney), Tom Cockburn (attorney), Thomas Schleier (Petrohawk), David Roth (attorney)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of email 102 below and email 95 above	Attorney-client privilege; attorney work product
102	9/20/2008 (9:46 a.m.)	Stan Coddou (Petrohawk)	J. Steven Stewart (attorney), Tom Cockburn (attorney), Thomas Schleier (Petrohawk)	Howard Isbell (Petrohawk), Patricia Schultz- Ormond (JPMorgan)	Email correspondence regarding dispute with surface owners, includes email string consisting of email 95 above	Attorney-client privilege; attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
103	09/22/2008 (8:21 a.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	David Roth (attorney)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of email 104 below and emails 94-95 and 100-101 above.	Attorney-client privilege; attorney work product
104	09/22/2008 (8:27 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan), Arthur Slagle (Petrohawk)	J. Steven Stewart (attorney), Howard Isbell (Petrohawk)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 94-95, 100-101 and 103 above.	Attorney-client privilege; attorney work product
105	09/22/2008 (8:38 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	David Roth (attorney), J. Steven Stewart (attorney)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of email 106 below and emails 94-95, 100-101 and 103-104 above.	Attorney-client privilege; attorney work product
106	09/22/2008 (8:35 a.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	David Roth (attorney)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 94-95, 100-101 and 103-105 above.	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
107	09/24/2008 (7:28 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of emails 108-110 below.	Attorney work product
108	09/23/2008 (4:57 p.m.)	J. Steven Stewart (attorney)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of emails 109-110 below.	Attorney-client privilege; attorney work product
109	09/23/2008 (4:48 p.m.)	Stan Coddou (Petrohawk)	J. Steven Stewart (attorney)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of email 110 below.	Attorney-client privilege; attorney work product
110	09/23/2008 (4:43 p.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners.	Attorney work product
111	09/25/2008 (8:40 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	Gregg Robertson (First Rock), Thomas Schleier (Petrohawk), J. Steven Stewart (attorney), Howard Isbell (Petrohawk)	Email correspondence regarding dispute with surface owners, includes email string consisting of email 112 below.	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
112	09/25/2008 (12:36 a.m.)	Gregg Robertson (First Rock)	Howard Isbell (Petrohawk), Chris Morro (Petrohawk), Charles Latch (Petrohawk), Dick Stoneburner	Arthur Slagle (Petrohawk), Stan Coddou (Petrohawk), Gary Gilbert (Petrohawk), Bob Berteau (Petrohawk)	Email correspondence regarding dispute with surface owners.	Attorney work product
113	09/27/2008 (8:26 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan), J. Steven Stewart (attorney)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of emails 114-115 below.	Attorney-client privilege; attorney work product
114	09/26/2008 (8:09 a.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of email 115 below.	Attorney work product
115	09/25/2008 (5:31 p.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners.	Attorney work product
116	12/16/2008 (12:17 p.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding legal fees, includes email string consisting of email 117 below.	Attorney work product
117	12/16/2008 (10:41 a.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding legal fees.	Attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
118	03/02/2009 (6:07 p.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding legal fees, includes email string consisting of emails 119 below.	Attorney work product
119	03/02/2009 (6:00 p.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding legal fees.	Attorney work product
120	03/03/2009 (10:41 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding legal fees, includes email string consisting of emails 118-119 above and 121 below.	Attorney work product
121	03/02/2009 (6:35 p.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding legal fees, includes email string consisting of emails 118-120 above.	Attorney work product
122	03/05/2009 (4:03 p.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding legal fees, includes email string consisting of email 123 below.	Attorney work product
123	03/05/2009 (4:01 p.m.)	Anne Brothers (Petrohawk)	Stan Coddou (Petrohawk)	None	Email correspondence regarding legal fees.	Attorney work product



<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
124	03/05/2009 (5:09 p.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding legal fees, includes email string consisting of email 125 below and 122-123 above.	Attorney work product
125	03/05/2009 (5:56 p.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding legal fees.	Attorney work product
126	03/26/2009 (10:24 a.m.)	Thomas Schleier (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 127-130 below.	Attorney work product
127	03/26/2009 (10:02 a.m.)	J. Steven Stewart (attorney)	Thomas Schleier (Petrohawk)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 128-130 below.	Attorney-client privilege; attorney work product
128	03/26/2009 (9:59 a.m.)	J. Steven Stewart (attorney)	Benjamin Bosell (attorney)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 129-130 below	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
129	03/20/2009 (9:17 a.m.)	Benjamin Bosell (attorney)	J. Steven Stewart (attorney)	David Roth (attorney)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of email 130 below.	Attorney-client privilege; attorney work product
130	03/19/09 (3:14 p.m.)	J. Steven Stewart (attorney)	Benjamin Bossell (attorney)	None	Email correspondence regarding dispute with surface owners and legal action.	Attorney-client privilege; attorney work product
131	04/08/2009 (8:53 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	Thomas Schleier (Petrohawk)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 132-133 below.	Attorney work product
132	04/08/2009 (8:20 a.m.)	J. Steven Stewart (attorney)	Stan Coddou (Petrohawk), Thomas Schleier (Petrohawk)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of email 133 below.	Attorney-client privilege; attorney work product
133	04/07/2009 (6:26 p.m.)	Benjamin Bosell (attorney)	J. Steven Stewart (attorney)	David Roth (attorney)	Email correspondence regarding dispute with surface owners and legal action.	Attorney-client privilege; attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
134	04/08/2009 (10:13 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 132-133 above and 135-136 below.	Attorney work product
135	04/08/2009 (9:19 a.m.)	J. Steven Stewart (attorney)	Thomas Schleier (Petrohawk), Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 132-133 above and 136 below.	Attorney-client privilege; attorney work product
136	04/08/2009 (8:48 a.m.)	Thomas Schleier (Petrohawk)	J. Steven Stewart (attorney), Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners and legal action.	Attorney-client privilege; attorney work product
137	04/09/2009 (6:36 a.m.)	Stan Coddou (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of emails 138-139 below.	Attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
138	04/08/2009 (6:18 p.m.)	Patricia Ormond (JP Morgan)	Thomas Schleier (Petrohawk), Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of email 139 below.	Attorney work product
139	04/08/2009 (7:15 p.m.)	Patricia Ormond (JP Morgan)	Thomas Schleier (Petrohawk), Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners and legal action.	Attorney work product
140	04/09/2009 (11:07 a.m.)	Benjamin Bosell (attorney)	Patricia Ormond (JP Morgan)	David Roth (attorney)	Email correspondence regarding dispute with surface owners and legal action.	Attorney-client privilege; attorney work product
141	09/12/2008 (11:42 a.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners and legal action.	Attorney work product
142	09/18/2008 (5:59 p.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners.	Attorney work product
143	09/24/2008 (8:39 a.m.)	Patricia Ormond (JP Morgan)	Stan Coddou (Petrohawk)	None	Email correspondence regarding dispute with surface owners, includes email string consisting of emails 107-110 above.	Attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
144	01/26/2009 (6:01 p.m.)	Patricia Ormond (JP Morgan)	Thomas Schleier (Petrohawk)	Stan Caddou (Petrohawk)	Email correspondence regarding dispute with surface owners and legal action, includes email string consisting of email 145 below.	Attorney work product
145	01/26/2009 (4:11 p.m.)	Thomas Schleier (Petrohawk)	Patricia Ormond (JP Morgan)	None	Email correspondence regarding dispute with surface owners and legal action.	Attorney work product
146	03/03/2009 (11:49 a.m.)	Patricia Ormond (JP Morgan)	Stan Caddou (Petrohawk)	None	Email correspondence regarding legal fees, includes email string consisting of emails 118-121 above.	Attorney work product
147	11/19/2008 (4:24 p.m.)	Patricia Ormond (JP Morgan)	Stan Caddou (Petrohawk)	Charles Cusack (Petrohawk)	Email correspondence regarding dispute with surface owners and legal action.	Attorney work product
148	11/18/1992	John Flannery, Jr., Ameritrust, Vice President	Paul Smith (attorney)	None	Correspondence regarding Cullen Leases (STS 000767-000768)	Attorney-client privilege and attorney work product
149	03/15/1993	John Flannery, Jr., Ameritrust, Vice President	Paul Smith (attorney)	None	Correspondence regarding Cullen Leases (STS 001204-001205)	Attorney-client privilege and attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
150	05/24/1993	John Flannery, Jr., Ameritrust, Vice President	Paul Smith (attorney)	None	Correspondence regarding Kenley surface dispute (STS 001173-001174)	Attorney-client privilege and attorney work product
151	09/03/1993	John Flannery, Jr., Ameritrust, Vice President	Paul Smith (attorney)	None	Correspondence regarding Kenley surface dispute (STS 001116)	Attorney-client privilege and attorney work product
152	07/28/2000	Paul Smith (attorney)	Peggy Sullivan	None	Memorandum regarding leases	Attorney-client privilege and attorney work product
153	08/10/2000	John Flannery, Jr., Chase Vice President	Paul Smith (attorney)	None	Correspondence regarding Cullen Leases	Attorney-client privilege and attorney work product
154	07/27/2000	Paul Smith (attorney)	John Flannery, Jr., Chase Vice President	Peggy Sullivan (attorney)	Correspondence concerning legal strategy on Cullen Leases	Attorney-client privilege and attorney work product
155	07/27/2000	Paul Smith (attorney)			Draft correspondence regarding Cullen Leases	Attorney-client privilege and attorney work product
156	06/20/2000	Paul Smith (attorney)	Peggy Sullivan (attorney)	None	Memorandum regarding Cullen Leases	Attorney-client privilege and attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
157	06/15/2000	Paul Smith (attorney)			Draft correspondence regarding Cullen Leases	Attorney-client privilege and attorney work product
158	10/08/1999	John Flannery, Jr., Chase Vice President	Joe Finger, Consulting Geologist	None	Memorandum regarding legal strategy in development of Cullen Leases	Attorney-client privilege; attorney work product; consulting expert privilege
159	00/00/0000	Paul Smith (attorney)	None	None	Map w/Handwritten Notes	Attorney-client privilege and attorney work product
160	05/03/1994	Paul Smith (attorney)	John Flannery, Jr., Texas Commerce Bank Vice President	None	Correspondence regarding surface disputes	Attorney-client privilege and attorney work product
161	04/28/1994	John Flannery, Jr., Texas Commerce Bank Vice President	Paul Smith (attorney)	None	Correspondence regarding surface disputes	Attorney-client privilege and attorney work product
162	10/14/1993	Paul Smith (attorney)	John Flannery, Jr., Ameritrust Vice President	None	Correspondence regarding surface disputes	Attorney-client privilege and attorney work product

<b>No.</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>CC:</b>	<b>Description</b>	<b>Privilege</b>
163	09/03/1993	John Flannery, Jr., Ameritrust Vice President	Paul Smith (attorney)	None	Correspondence regarding surface disputes	Attorney-client privilege and attorney work product
164	08/06/2007	Patricia Ormond (JP Morgan)	Al Leach (JP Morgan)	None	Email correspondence regarding legal strategy in development of Cullen Leases	Attorney-client privilege and attorney work product
165	04/13/2009	David H.O. Roth (Cox Smith attorney)	Patricia Ormond (JPMorgan)		Correspondence enclosing legal analysis memorandum	Attorney-client privilege and attorney work product
166	04/13/2009	Benjamin L. Bosell (Cox Smith attorney)	Patricia Ormond (JP Morgan)	David H.O. Roth, James M. (Marty) Truss, Corey F. Wehmeyer (Cox Smith attorneys)	Legal analysis memorandum	Attorney-client privilege and attorney work product
167	04/13/09-03/23/2011	David H.O. Roth, James M. (Marty) Truss, Benjamin L. Bosell, Corey F. Wehmeyer, and/or David A. Vanderhider (Cox Smith attorneys)	Patricia Ormond, Gary Aymes, H.L. Tompkins, Bert Hayes-Davis, Charlotte Ray, Richard A. Korecki, Glenn McFarlane, and/or Susan P. Kravik (JP Morgan)		Voluminous email and written correspondence and legal memoranda prepared and sent by various Cox Smith lawyers to various JPMorgan recipients in the course of providing legal services	Attorney-client and attorney work product



No.	Date	Author	Recipient	CC:	Description	Privilege
168	4/13/09-03/23/2011	Patricia Ormond, Gary Aymes, H.L. Tompkins, Bert Hayes-Davis, Charlotte Ray, Richard A. Korecki, Glenn McFarlane, and/or Susan P. Kravik (JP Morgan)	David H.O. Roth, James M. (Marty) Truss, Benjamin L. Bosell, Corey F. Wehmeyer, and/or David A. Vanderhider (Cox Smith attorneys)		Voluminous email and written correspondence prepared and sent by various JPMorgan employees to various Cox Smith lawyers in the course of seeking and receiving legal services	Attorney-client and attorney work product
169	4/13/09-03/23/2011	David H.O. Roth, James M. (Marty) Truss, Benjamin L. Bosell, Corey F. Wehmeyer, David A. Vanderhider and/or various Cox Smith legal assistants (Cox Smith attorneys and legal assistants)	David H.O. Roth, James M. (Marty) Truss, Benjamin L. Bosell, Corey F. Wehmeyer, David A. Vanderhider and/or various Cox Smith legal assistants (Cox Smith attorneys and legal assistants)		Voluminous email correspondence prepared and sent internally at Cox Smith in the course of providing legal services to JPMorgan, drafts of legal documents containing attorney mental impressions that were not publicly filed or not publicly filed in the draft form prepared	Attorney-client and attorney work product

No.	Date	Author	Recipient	CC:	Description	Privilege
170	04/13/09-3/23/2011	David H.O. Roth, James M. (Marty) Truss, Benjamin L. Bosell, Corey F. Wehmeyer, David A. Vanderhider and/or various Cox Smith legal assistants (Cox Smith attorneys and legal assistants)			Attorney notes file and attorney research	Attorney work product
171	2009-2011	EOG Resources Document Production, Pioneer Natural Resources Document Production, JPMorgan Retained Experts			Various documents produced by EOG Resources and Pioneer Natural Resources designated as attorneys' eyes only and/or confidential pursuant to Protective Order in case; derivative work product prepared by JPMorgan retained experts using attorneys' eyes only and/or confidential data and documents produced by EOG/Pioneer	Trade Secret/Protected from Disclosure by Court Order of 218 <sup>th</sup> La Salle County District Court, entered in Cause No. 09-04-00036-CVL

No.	Date	Author	Recipient	CC:	Description	Privilege
172	11/4/2011- 6/21/2013	James M. (Marty) Truss, Corey F. Wehmeyer, and/or Cox Smith legal assistants (Cox Smith attorneys and legal assistants)	Jed Williams (JPMorgan outside lawyer), Pat Sheehan (JPMorgan outside lawyer), and/or Susan Kravik (JPMorgan, in-house lawyer)		Various email and written correspondence responding to requests in connection with newly filed litigation over Trust issues	Attorney-client and attorney work product
173	11/4/2011- 6/21/2013	Jed Williams (JPMorgan outside lawyer), Pat Sheehan (JPMorgan outside lawyer), and/or Susan Kravik (JPMorgan, in-house lawyer)	James M. (Marty) Truss, Corey F. Wehmeyer, and/or Cox Smith legal assistants (Cox Smith attorneys and legal assistants)		Various email and written correspondence requesting documents and information in connection with newly filed litigation over Trust issues	Attorney-client privilege and attorney work product