



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

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

NOV 12 2013
4:45

JOHN K. MEYER, ET AL.
Plaintiffs,

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IN THE DISTRICT COURT

vs.

DEPUTY

Alistera Carrizosa

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

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

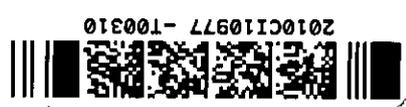
**PLAINTIFFS' MOTION TO EXTEND DEADLINE TO
DESIGNATE EXPERT WITNESSES**

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 their Motion to Extend Deadline to Designate Expert Witnesses, and would respectfully show the Court the following:

1. This is a complex oil and gas case concerning Plaintiffs' beneficiaries' 207 square mile mineral estate in the heart of the Eagle Ford shale play. More than 137,000 documents have been produced among the parties, 32 depositions have been taken, 698 deposition exhibits have been identified, with depositions yet to be scheduled, and with some deposition transcripts not yet prepared.

2. The parties have agreed that the Plaintiffs would designate their experts by November 15, 2013, and that Defendants would designate their experts by January 10, 2014.



Document
scanned as filed.

3. Plaintiffs request a one week extension to designate its expert witnesses until November 22, 2013. Plaintiffs have agreed that Defendants can have one additional week until January 17, 2014 in which to designate their experts. Plaintiffs have exercised due diligence in conducting discovery and in obtaining expert reports, however, additional time is needed in order for the experts to complete their reports.

4. An extension of time will not prejudice the Defendants. Trial is not set until March 24, 2014. This one week extension is not sought for delay only but that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that this Court set this matter for hearing and that upon hearing hereof, enter an order granting Plaintiff's Motion to Extend the Deadline to Designate Expert Witnesses and further pray for such other and additional relief to which they may show themselves to justly entitled.

Respectfully submitted,

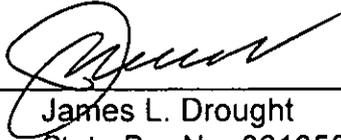
John B. Massopust (*pro hac vice*)
Matthew J. Gollinger (*pro hac vice*)
ZELLE HOFMANN VOELBEL & MASON LLP
500 Washington Avenue South, Suite 4000
Minneapolis, Minnesota 55415-1152
(612) 339-2020 - Telephone
(612) 336-9100 - Facsimile
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,
LINDA ALDRICH, ET AL.**

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
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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 CONFERENCE

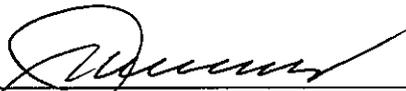
I hereby certify that an attempt was made with counsel for Defendant to resolve this matter. As of the date of filing of this Motion, the matter has not been resolved. Accordingly, it is requested that the Court determine the matters at hand.


James L. Drought

VERIFICATION

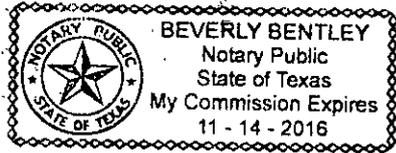
STATE OF TEXAS §
 §
COUNTY OF BEXAR §

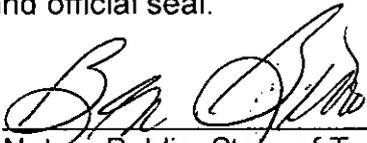
BEFORE ME, the undersigned Notary Public, on this day personally appeared James L. Drought, who being by me duly sworn on oath deposed and said that he is one of the duly authorized attorneys for Plaintiffs in the above entitled and numbered cause; that he has read the above Motion to Extend Deadline to Designate Expert Witnesses and every statement contained therein is within his personal knowledge and is true and correct.



James L. Drought

SUBSCRIBED AND SWORN TO BEFORE ME on the 12th day of November, 2013, to certify which witness my hand and official seal.



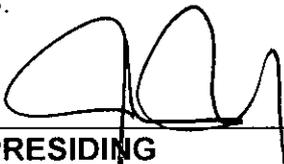


Notary Public, State of Texas

FIAT

Plaintiffs' Motion to Extend Deadline to Designate Expert Witnesses is hereby set for hearing on November 15, 2013 at 8:30 a.m. in the Presiding Judicial District Court, Room 109, Bexar County, San Antonio, Texas.

NOV 12 2013
SIGNED this _____ day of November, 2013.



JUDGE PRESIDING

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 12th day of November, 2013.



James L. Drought

(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO BLUESTONE NATURAL RESOURCES, LLC**

Plaintiffs serve upon:

C T Corporation System
350 N. St. Paul St., Ste. 2900
Dallas, Texas 75201

Registered Agent for:

Bluestone Natural Resources, LLC
2199 South Utica, Suite 200
Tulsa, Oklahoma 74114

Angela M. McKinney

DEPUTY

2013 NOV -6 A 10:12

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request Bluestone Natural Resources, LLC produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon Bluestone Natural Resources, LLC after the expiration of ten

(10) days from service of this Notice.

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
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EMILIE BLAZE, ET AL.**

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Sharon C. Savage
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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

3 4 5

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Assignment between Petrohawk Properties, LP (Assignor) and Bluestone Natural Resources, LLC (Assignee) dated January 29, 2009 of the Oil and Gas Lease between the South Texas Syndicate (Lessor) and Petrohawk Properties, LP (Lessee) dated December 12, 2008 covering 9,270 acres of the original 15,456.66 acres in La Salle and McMullen Counties, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please produce documentation reflecting what consideration was paid for the Assignment between Petrohawk Properties, LP (Assignor) and Bluestone Natural Resources, LLC (Assignee) dated January 29, 2009 of the Oil and Gas Lease between the South Texas Syndicate (Lessor) and Petrohawk Properties, LP (Lessee) dated December 12, 2008 covering 9,270 acres of the original 15,456.66 acres in La Salle and McMullen Counties, Texas.

RESPONSE:

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

on this the 1 day of November, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.

- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

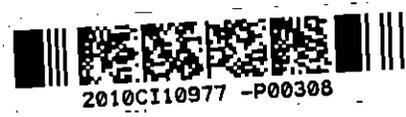
REQUESTS FOR PRODUCTION

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RESPONSE:

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RESPONSE:



(Consolidated Under)
2010-CI-10977

JOHN K. MEYER §
§
V. §
§
JP MORGAN CHASE BANK, N.A., §
INDIVIDUALLY/CORPORATELY §
AND AS TRUSTEE OF THE SOUTH §
TEXAS SYNDICATE TRUST §
AND GARY P. AYMES §

IN THE DISTRICT COURT
225TH JUDICIAL DISTRICT
BEXAR COUNTY, TEXAS

FILED
DONNA K. HENNING
DISTRICT CLERK
BEXAR COUNTY
2013 NOV -7 P 3:18
DEPUTY
Grace Strada

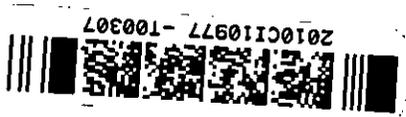
PLAINTIFFS' MOTION TO COMPEL

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

Plaintiffs' Fifth Requests for Production

On or about September 19, 2013, Plaintiffs served JPM with their Fifth Requests for Production. On or about October 22, 2013, JPM served its Objections and Responses, a copy of which is attached hereto as **Exhibit 1**. JPM raised numerous unfounded objections to all of the Requests for Production and has completely failed to produce any documents.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that this Court set this matter for hearing and that upon hearing hereof, enter an order granting Plaintiffs' Motion to Compel JPM to remove its objections and answer Plaintiffs' Fifth Requests for Production and produce the requested documents and award



Document scanned as filed.

reasonable attorneys' fees incurred for bringing this Motion, and further pray for such other and further relief to which they may show themselves to 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.**

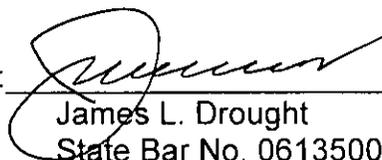
Jim L. Flegle
State Bar No. 07118600
LOEWINSOHN FLEGLE DEARY, L.L.P.
12377 Merit Dr., Suite 900
Dallas, Texas 75251
(214) 572-1700 - Telephone
(214) 572-1717 - Facsimile
**ATTORNEYS FOR PLAINTIFFS,
EMILIE BLAZE, ET AL.**

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: _____


James L. Drought
State Bar No. 06135000

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

CERTIFICATE OF CONFERENCE

I hereby certify that an attempt was made with counsel for Defendants to resolve this matter. As of the date of filing of this Motion, the matter has not been resolved. Accordingly, it is requested that the Court determine the matters at hand.

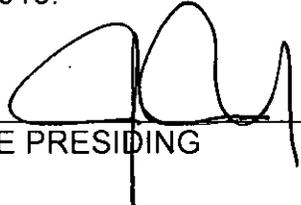


James L. Drought

FIAT

Plaintiffs' Motion to Compel is hereby set for hearing on November 14, 2013 at 8:30 a.m. in the Presiding Judicial District Court, Room 109, Bexar County, San Antonio, Texas.

SIGNED this 7 day of November, 2013.



JUDGE PRESIDING

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 7th day of November, 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.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

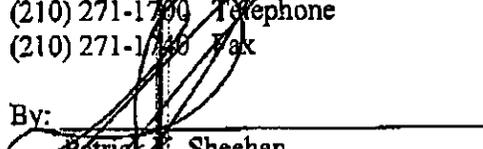
**DEFENDANT JPMORGAN CHASE BANK, N.A.'S RESPONSES TO PLAINTIFF'S
FIFTH REQUEST FOR PRODUCTION**

Defendant JPMorgan Chase Bank, N.A., Individually/Corporately, ("J.P. Morgan")
submits these Responses to Plaintiff's Fifth Request for Production.

Respectfully submitted,

**HORNBERGER SHEEHAN FULLER BEITER
WITTENBERG & GARZA INCORPORATED**
7373 Broadway, Suite 700
San Antonio, Texas 78209
(210) 271-1700 Telephone
(210) 271-1700 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

ATTORNEYS FOR DEFENDANTS

EXHIBIT 1

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this document was served upon the following on October 22, 2013 by the method indicated:

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
Mr. Jeven R. Sloan
LOEWINSOHN FLEGLE DEARY, L.L.P.
12377 Merit Drive, Suite 900
Dallas, Texas 75251

VIA FACSIMILE

Mr. James L. Drought
DROUGHT DROUGHT & BOBBITT, LLP
112 East Pecan, Suite 2900
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. George Spencer, Jr.
Mr. Jeffrey J. Towers
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

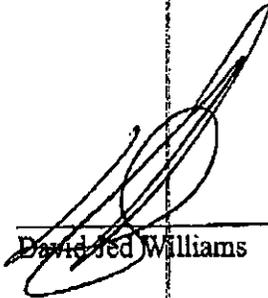
VIA FACSIMILE

Mr. 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 Fred Williams

DEFENDANT'S RESPONSES TO PLAINTIFF'S FIFTH REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce all documents relating to the calculation of banking days involving the Petrohawk Properties, LP 12,772.9325 acre Lease dated on or about May 27, 2008.

OBJECTION:

Defendant objects to this Request on the following basis:

- 1. This Request is overly broad, harassing, and unduly burdensome in asking for "all documents relating to the calculation of banking days..."

RESPONSE:

Subject to and without waiving this objection, Defendant will produce representative documents responsive to this Request, if any, that contain the requested information.

REQUEST FOR PRODUCTION NO. 2: Produce all documents relating to the calculation of banking days involving the Petrohawk Properties, LP 12,073.475 acre Lease dated on or about May 27, 2008.

OBJECTION:

Defendant objects to this Request on the following basis:

- 1. This Request is overly broad, harassing, and unduly burdensome in asking for "all documents relating to the calculation of banking days..."

RESPONSE:

Subject to and without waiving this objection, Defendant will produce representative documents responsive to this Request, if any, that contain the requested information.

REQUEST FOR PRODUCTION NO. 3: Produce all documents relating to the calculation of banking days involving the Petrohawk Properties, LP 16,903.43 acre Lease dated on or about July 16, 2008.

OBJECTION:

Defendant objects to this Request on the following basis:

- 1. This Request is overly broad, harassing, and unduly burdensome in asking for "all documents relating to the calculation of banking days..."

RESPONSE:

Subject to and without waiving this objection, Defendant will produce representative documents responsive to this Request, if any, that contain the requested information.

REQUEST FOR PRODUCTION NO. 4: Produce all documents relating to the calculation of banking days involving the Petrohawk Properties, LP 15,456.66 acre Lease dated on or about December 12, 2008.

OBJECTION:

Defendant objects to this Request on the following basis:

- 1. This Request is overly broad, harassing, and unduly burdensome in asking for "all documents relating to the calculation of banking days..."

RESPONSE:

Subject to and without waiving this objection, Defendant will produce representative documents responsive to this Request, if any, that contain the requested information.

REQUEST FOR PRODUCTION NO. 5: Produce all documents relating to the calculation of banking days involving the Petrohawk Properties, LP 3,845.305 acre Lease dated on or about December 12, 2008.

OBJECTION:

Defendant objects to this Request on the following basis:

- 1. This Request is overly broad, harassing, and unduly burdensome in asking for "all documents relating to the calculation of banking days..."

RESPONSE:

Subject to and without waiving this objection, Defendant will produce representative documents responsive to this Request, if any, that contain the requested information.

REQUEST FOR PRODUCTION NO. 6: Produce all documents relating to the calculation of banking days involving the Petrohawk Properties, LP 18,473.04 acre Lease dated on or about December 12, 2008.

OBJECTION:

Defendant objects to this Request on the following basis:

1. This Request is overly broad, harassing, and unduly burdensome in asking for "all documents relating to the calculation of banking days..."

RESPONSE:

Subject to and without waiving this objection, Defendant will produce representative documents responsive to this Request, if any, that contain the requested information.



(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO SHELL OFFSHORE INC.

Handwritten signature
DEPUTY

2013 NOV - 1 A 10:32

FILED
DONNA KAY HEKINNEY
DISTRICT CLERK
BEXAR COUNTY

Plaintiffs serve upon:

Shell Offshore Inc.
c/o Michael Wilson, Senior Counsel
Shell Oil Co.
200 N. Dairy Ashford
Houston, Texas 77079

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request that Shell Offshore Inc. produce for inspection and copying all documents responsive to the Requests attached hereto at 9:30 a.m. on November 26, 2013 at the offices of Shell Oil Co. (or another mutually agreed upon location), 200 N. Dairy Ashford, Houston, Texas 77079. Plaintiffs will serve a Subpoena upon Shell Offshore Inc. after the expiration of ten (10) days from service of this Notice.

Respectfully submitted,

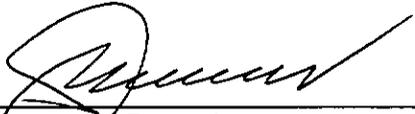
John B. Massopust (*pro hac vice*)
Matthew J. Gollinger (*pro hac vice*)
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San Antonio, Texas 78216
Telephone: (210) 225-3121
Facsimile: (210) 225-6235

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 25th day of October, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce a copy of the May 12, 2010 Harrison Interests, Ltd. Lease with P Ranch Working Interest, LLC of a 105,937.48 acres of land, more or less, situated in Dimmit, Webb and La Salle Counties ("the Lease").

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Produce documents showing the assignment or other conveyance of the Lease from P Ranch Working Interest, LLC to its assignees.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Produce assignments or other conveyances wherein Shell Offshore Inc. acquired an interest in the lease.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Produce documents showing the consideration paid to the Harrison Interests, Ltd. for the Lease or any assignment or conveyance thereof.

RESPONSE:



(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO SWEPI LP**

Plaintiffs serve upon:

**SWEPI LP
c/o Michael Wilson, Senior Counsel
Shell Oil Co.
200 N. Dairy Ashford
Houston, Texas 77079**

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request

that SWEPI LP produce for inspection and copying all documents responsive to the Requests attached hereto at **9:30 a.m. on November 26, 2013** at the offices of Shell Oil Co., (or another mutually agreed upon location), 200 N. Dairy Ashford, Houston, Texas 77079. Plaintiffs will serve a Subpoena upon SWEPI LP after the expiration of ten (10) days from service of this Notice.

Asst. Clerk
DEPUTY
2013 NOV - 1 A 10 30
10132
FILED
DONNA KAY McKINNEY
DISTRICT CLERK
BEXAR COUNTY

Respectfully submitted,

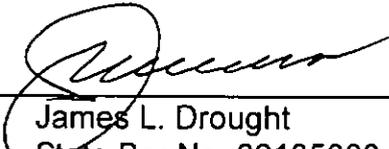
John B. Massopust (*pro hac vice*)
Matthew J. Gollinger (*pro hac vice*)
ZELLE HOFMANN VOELBEL & MASON LLP
500 Washington Avenue South, Suite 4000
Minneapolis, Minnesota 55415-1152
(612) 339-2020 - Telephone
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**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,
LINDA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

Jim L. Flegle
State Bar No. 07118600
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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
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Dallas, Texas 75202

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

on this the 25th day of October, 2013.



James L. Drought

INSTRUCTIONS

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RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Produce assignments or other conveyances wherein SWEPI LP acquired an interest in the lease.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Produce documents showing the consideration paid to the Harrison Interests, Ltd. for the Lease or any assignment or conveyance thereof.

RESPONSE:

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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

Joanna Martinez
DEPUTY

13 OCT 28 2:38 PM 3:05
FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

REPORTER'S CERTIFICATION
ORAL AND VIDEOTAPED DEPOSITION OF H.L. TOMPKINS
SEPTEMBER 17th, 2013

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

That the witness, H.L. TOMPKINS, 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
9-25-13 to the attorney for the witness
for examination, signature, and return to me by
10-15-13;

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

Mr. Michael S. Christian - 3 Hours: 40 Minutes
Mr. James L. Drought - 1 Hour: 53 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. James L. Drought
Mr. Ian T. Bolden
Mr. Richard Tinsman
Ms. Sharron Savage
Mr. Robert J. Rosenbach

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FILED

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FOR THE PLAINTIFF EMILIE BLAZE:
Mr. Jim L. Flegle

FOR THE PLAINTIFF INTERVENORS:
Mr. Michael S. Christian

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

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 23rd day of September, 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

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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 H.L. TOMPKINS
SEPTEMBER 17th, 2013

The original deposition was / was not returned to
the deposition officer on 10-15-13;

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

If returned, the original deposition was delivered
to MR. IAN T. BOLDEN, agreed Custodial Attorney;

That \$1699.50 is the deposition officer's
charges to the Plaintiffs 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 21st day of Oct.,
2013.

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

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Before me, H.L. Tompkins, on this day personally appeared H.L. TOMPKINS, known to me or proved to me under oath or through _____, to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this the 14th day of October, 2013.

Jessie Reeves
Notary Public in and for
the State of Texas.



2010CI10977 -P00326

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

JOHN K. MEYER, ET AL.
Plaintiffs,

vs.

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

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

PLAINTIFFS' NOTICE OF FILING OF RULE 11 AGREEMENT

TO THE HONORABLE JUDGE OF SAID COURT:

Now come Plaintiffs in the above-entitled and numbered cause, and file the attached Rule 11 Agreement with the Court.

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

DONNA KAY WILKINNEY
DISTRICT CLERK
BEXAR COUNTY

2010 NOV 15 PM 1:49

DEPUTY
BY *Linda Aldrich*

DOCUMENT
SCANNED
AS FILED

**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
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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:

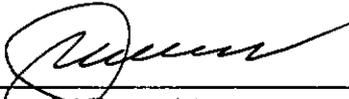
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Mr. Patrick K. Sheehan
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1445 Ross Avenue, Suite 3700
Dallas, Texas 75202

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

on this the 15th day of November, 2013.



James L. Drought

**DROUGHT DROUGHT & BOBBITT LLP**

ATTORNEYS AT LAW

November 14, 2013

Mr. David Jed Williams
Hornberger Sheehan Fuller Beiter Wittenberg & Garza, Inc.
The Quarry Heights Building
7373 Broadway, Suite 300
San Antonio, Texas 78209

VIA FAX AND EMAIL

Re: Cause No. 2010-CI-10977; *John K. Meyer, et al., Plaintiff v. JP Morgan, et al., Defendants.*
Rule 11 Letter Agreement

Dear Counsel:

We propose that Plaintiffs' deadline to designate expert witnesses be extended to **November 22, 2013**. Plaintiffs will either email or hand deliver the expert reports to you by 5:00 p.m. We further propose that Defendants' deadline to designate expert witnesses be extended to **January 22, 2014**. Defendants will either email or hand deliver the expert reports to Plaintiffs by 5:00 p.m.

Our experts will be available for depositions December 9, 10 and 11, 2013. If those dates do not work, we will work on scheduling deposition dates the next week. We will not request further extension of expert deadlines except for good cause shown.

All other deadlines set forth in the Amended Docket Control Order dated May 7, 2013 will remain the same.

If this meets with your approval, please so indicate by signing below and returning to me. I will then see that our agreement is filed as a Rule 11 letter.

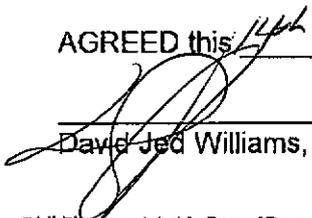
With best regards.

Sincerely,


James L. Drought

JLD/beb

AGREED this 14th day of November, 2013.



David Jed Williams, Attorney for Defendants



2010CI10977 -P00325

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

JOHN K. MEYER, ET AL.
Plaintiffs,

vs.

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

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**PLAINTIFFS' SUBPOENA TO NON-PARTY TO PRODUCE
DOCUMENTS INCLUDING ELECTRONIC AND/OR MAGNETIC DATA**

THE STATE OF TEXAS

TO: **Brad Jauer, Registered Agent**
GulfTex Energy, LLC
18615 Tuscany Stone, Suite 340
San Antonio, Texas 78258

BY  DEPUTY
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY
2013 NOV 15 PM 1:50

Greetings:

YOU ARE COMMANDED to produce and permit inspection and copying of the documents, including electronic and/or magnetic data, as identified in the Notice attached hereto as **Exhibit A**, which was served on all parties and the person/organization to whom this subpoena is addressed on November 1, 2013. The requested documents, including electronic and/or magnetic data, are to be produced on November 25, 2013 at the following time and place:

Time: 10:00 a.m.
Place: Drought, Drought & Bobbitt, L.L.P.
2900 Weston Centre, 112 East Pecan Street
San Antonio, Texas, 78205

DOCUMENT
SCANNED
AS FILED

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, whose attorneys of record are John B. Massopust and Matthew J. Gollinger of Zelle Hoffman Voelbel & Mason LLP; Jim L. Flegle of Loewinsohn Flegle Deary, L.L.P., Richard Tinsman of Tinsman & Sciano, Inc. and James L. Drought of Drought, Drought & Bobbitt, L.L.P.

Date of issuance: November 12, 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
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(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 \$11.00 in person to Brad Jauer, Registered Agent for GulfTex Energy, LLC, at 18615 Tuscany Stone, Suite 340, San Antonio, Texas 78258, on the 13 day of November, 2013.



Signature

MARK STEINER
SCH2390 exp. 12/31/15

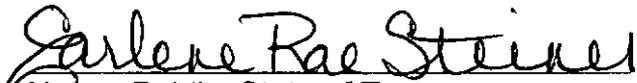
Print Name

Supreme Court Appointed
Title Process Server

STATE OF TEXAS §
 §
COUNTY OF BEXAR §

This instrument was acknowledged before me on this the 13 day of November, 2013.





Notary Public, State of Texas

(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO GULFTEX ENERGY, LLC

Plaintiffs serve upon:

Brad Jauer, Registered Agent
GulfTex Energy, LLC
18615 Tuscan Stone, Suite 340
San Antonio, Texas 78258

BY: _____

DEPUTY

2013 NOV -6 AM 12

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DOUNA KAY HASKINNEY
DISTRICT CLERK
BEXAR COUNTY

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request GulfTex Energy, LLC produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon GulfTex Energy, LLC after the expiration of ten (10) days from service of this Notice.

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.**

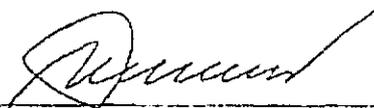
Jim L. Flegle
State Bar No. 07118600
LOEWINSOHN FLEGLE DEARY, L.L.P.
12377 Merit Dr., Suite 900
Dallas, Texas 75251
(214) 572-1700 - Telephone
(214) 572-1717 - Facsimile
**ATTORNEYS FOR PLAINTIFFS,
EMILIE BLAZE, ET AL.**

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:

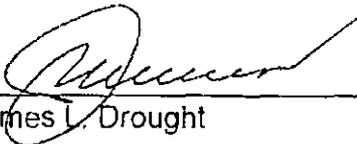
_____ U.S. Certified Mail, Return Receipt Requested to:
 Facsimile to:
_____ First Class Mail to:
_____ Hand Delivery to:

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 1 day of November, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Partial Assignment of Oil and Gas Lease from BB-II Operating LP (Assignor) to GulfTex Energy LLC (Assignee) dated August 1, 2009 conveying an interest in the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please produce documentation reflecting the consideration paid for the Partial Assignment of Oil and Gas Lease from BB-II Operating LP (Assignor) to GulfTex Energy LLC (Assignee) dated August 1, 2009 conveying an interest in the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Please produce the Partial Assignment of Oil and Gas Lease from Whittier Energy Company (Assignor) to GulfTex Energy, LLC (Assignee) dated April 1, 2010 conveying an interest in the lease between South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Please produce documents reflecting the consideration paid for the Partial Assignment of Oil and Gas Lease from Whittier Energy Company (Assignor) to GulfTex Energy, LLC (Assignee) dated April 1, 2010 conveying an interest in the lease between South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:



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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

REPORTER'S CERTIFICATION
ORAL AND VIDEOTAPED DEPOSITION OF
PATRICIA SCHULTZ-ORMOND
OCTOBER 4, 2013

CR

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

That the witness, PATRICIA SCHULTZ-ORMOND, 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 10-29-13 to the attorney for the witness for examination, signature, and return to me by 11-12-13;

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

- Mr. Jim L. Flegle - 6 Hours: 6 Minutes
- Mr. James L. Drought - 3 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 SR., THEODORE MEYER:
- Mr. James L. Drought
 - Mr. Ian T. Bolden
 - Mr. Richard Tinsman
 - Ms. Sharron Savage
 - Mr. Robert J. Rosenbach

Document scanned as filed.

Handwritten signature
DEPUTY
2013 NOV 15 P 4:07
FILED
DONNA KAY HASKINNEY
DISTRICT CLERK
BEXAR COUNTY

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FOR THE PLAINTIFF EMILIE BLAZE:
Mr. Jim L. Flegle

FOR INTERVENOR-PLAINTIFFS, LINDA ALDRICH, ET AL.:
Mr. John B. Massopust

FOR THE PLAINTIFF INTERVENORS:
Mr. Michael S. Christian

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

FOR PATRICIA SCHULTZ-ORMOND:
Mr. Barry Snell

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 10th day of October, 2013.



Joanna M. Martinez

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

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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
 PATRICIA SCHULTZ-ORMOND
 OCTOBER 4, 2013

The original deposition was / was not returned to
 the deposition officer on 11-08-13 ;

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

If returned, the original deposition was delivered
 to MR. IAN T. BOLDEN, Custodial Attorney;

That \$ 2700.10 is the deposition officer's
 charges to the Plaintiffs 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 18th day of Nov.
 2013.

Joanna M. Martinez
 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

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CHANGES AND SIGNATURE

PAGE	LINE	CHANGE	REASON
101	20	"Dan Coddou" to "Stan Coddou"	misspelled
102	6	Change "Belton" to "Billiton"	misspelled
104	8	Change "internal" to "ad valorem"	what I said
105	11	Change "plucked" to "plugged"	what I said
109	5	Change "from" to "for"	what I said
111	8	Change "lots" to "logs"	correct term
119	19	Change "Welter" to "Welder"	correct spelling
This line skipped			
127	20	Change "Pipper" to "Piper"	misspelled
131	1	Delete "it"	context
159	1	Change "lease" to "led"	Correct word
168	16	Change "was" to "wasn't"	what I said
177	1	Change "spoke" to "spoken"	what I said
193	14,15	Change "750" to "\$7.50"	Correct amount
193	16	Change "350" to "\$3.50"	Correct amount
210	12	Change "deed" to "deep"	correct typing

I, PATRICIA SCHULTZ-ORMOND, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

Patricia Schultz-Ormond
PATRICIA SCHULTZ-ORMOND

THE STATE OF TEXAS)

COUNTY OF HARRIS)

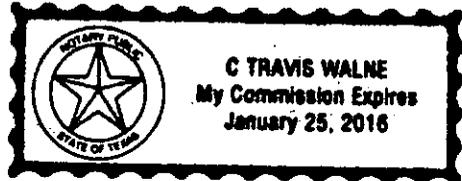
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Before me, C. Travis Walne, on this day personally appeared PATRICIA SCHULTZ-ORMOND, known to me or proved to me under oath or through _____, to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this the 7th day of November, 2013.

[Signature]

Notary Public in and for the State of Texas.

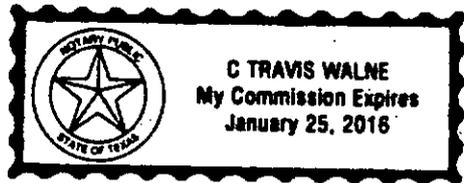


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Before me, C. Travis Walne, on this day personally appeared PATRICIA SCHULTZ-ORMOND, known to me or proved to me under oath or through _____, to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this the 7th day of November, 2013.

[Handwritten Signature]



Notary Public in and for the State of TEXAS.



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NO. 2010-CI-10977

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

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

Barbara Kay Griffin
 DEPUTY
 2013 NOV 15 PM 4: 08

REPORTER'S CERTIFICATION
 DEPOSITION OF JOSEPH M. FINGER, JR.
 SEPTEMBER 18, 2013

I, Barbara Kay Griffin, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, JOSEPH M. FINGER, JR., was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on 10-02-13 to the attorney for Defendants for examination, signature, and return to me by 10-07-13;

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

James L. Drought - 02:50

DOCUMENT
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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:

James L. Drought, Ian T. Bolden, Robert Rosenbach, and Richard Tinsman, Attorneys for Plaintiff(s)

Rudy Garza, Attorney for Defendant(s)

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 27 day of September, 2013.

Barbara Kay Griffin
BARBARA KAY GRIFFIN, Texas CSR
Expiration Date: 12/31/14
Firm Registration No. 631
645 Lockhill Selma, Suite 200
San Antonio, Texas 78216
(210) 697-3400



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FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition ~~was~~ was not returned to the deposition officer on 10-21-13;

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

If returned, the original deposition was delivered to JAMES L. DROUGHT, Custodial Attorney;

That \$ 1139.70 is the deposition officer's charges to the Plaintiffs 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 16th day of Nov., 2013.


BARBARA KAY GRIFFIN, Texas CCR 2494
Expiration Date: 12/31/14
Firm Registration No. 631
645 Lockhill Selma, Suite 200
San Antonio, Texas 78216
(210) 697-3400

By BW

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I, JOSEPH M. FINGER, JR., have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

Joseph M. Finger, Jr.
JOSEPH M. FINGER, JR., Witness

THE STATE OF Texas)
COUNTY OF Bexar)

Before me, Joseph M. Finger, Jr. on this day personally appeared JOSEPH M. FINGER, JR., known to me (or proved to me under oath or through personally known) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this 17th day of October, 2013.



Mary Jane Zorola
Notary Public in and for the State of Texas.



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CAUSE 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

REPORTER'S CERTIFICATION
ORAL & VIDEO DEPOSITION OF CHARLOTTE RAY
OCTOBER 7, 2013

CBT

I, DANDY ELLIS, Certified Shorthand Reporter,
in and for the State of Texas, hereby certify to the
following:

That the witness, CHARLOTTE RAY, was duly sworn
by the officer and that the transcript of the Oral &
Video Deposition is a true record of the testimony given
by the Witness;

That the deposition transcript was submitted on
10-24-13 () to the witness or (X) to
the attorney for the witness for examination, signature
and return to me by 11-13-13;

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

- MR. MATTHEW J. GOLLINGER- 03:04
- MR. ROBERT ROSENBAACH- 00:00
- MR. PATRICK K. SHEEHAN- 00:00
- MR. RICHARD TINSMAN- 00:00
- MR. IAN BOLDEN- 00:00

DOCUMENT
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AS FILED

Antonio Middleton
DEPUTY
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FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

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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:

- MR. MATTHEW J. GOLLINGER - Attorney for Plaintiff
- MR. ROBERT ROSENBACH - Attorney for Plaintiff
- MR. PATRICK K. SHEEHAN - Attorney for Defendant
- MR. RICHARD TINSMAN - Attorney for Plaintiff
- MR. IAN BOLDEN - Attorney for Plaintiff

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 16th day of October, 2013.



Dandy Ellis

DANDY ELLIS, Texas CSR 4702
 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

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FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition transcript ~~was~~ was not returned to the deposition officer on 11-08-13.

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

That \$1310.55 is the deposition officer's charges to MR. MATTHEW J. GOLLINGER 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 on and filed with the Clerk.

Certified to by me this 12th day of Nov., 2013.


DANDY ELLIS, Texas CSR 4702
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

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CHANGES AND SIGNATURE

WITNESS: CHARLOTTE RAY DEPO DATE: OCTOBER 7, 2013

PAGE	LINE	CHANGE	REASON
p. 22	17	"Ormon" to "Ormond"	misspelled
p. 29	22	"stimster" to "accounts"	reporter misunderstood
p. 46	22	"2010" to "2012"	mis-spoke
p. 46	25	"2010" to "2012"	mis-spoke
p. 74	16	"line" to "ground"	reporter misunderstood
p. 87	11	"conflicts" to "complex"	reporter misunderstood
p. 87	11	"liquidated" to "liquidating"	typo

I, CHARLOTTE RAY, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.


CHARLOTTE RAY

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LOUISIANA
THE STATE OF ~~TEXAS~~)
PARISH OF
COUNTY OF EAST BATON ROUGE)

Before me, Laura C. Poche on this day
personally appeared CHARLOTTE RAY, known to me (or
proved to me under oath or through _____)
(description or identity card or other document) to be
the person whose name is subscribed to the foregoing
instrument and acknowledged to me that they executed the
same for the purposes and consideration therein
expressed.

Given under my hand and seal of office this
31st day of October, 2013.

Laura C. Poche
NOTARY PUBLIC IN AND FOR
THE STATE OF ~~TEXAS~~ LOUISIANA
Laura C. Poche Roll # 19980
My commission is for life.

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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

Handwritten: Bertram Hayes-Davis
DEPUTY
2013 NOV 15 P 4:07
FILED
DONNA HAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY
2013 NOV 15 02

REPORTER'S CERTIFICATION
ORAL AND VIDEOTAPED DEPOSITION OF BERTRAM HAYES-DAVIS
OCTOBER 1, 2013

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

That the witness, BERTRAM HAYES-DAVIS, 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 10-21-13 to the attorney for the witness for examination, signature, and return to me by 11-12-13;

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

- Mr. Michael S. Christian - 2 Hours: 59 Minutes
- Mr. James L. Drought - 36 Minutes
- Mr. Robert R. Rosenbach - 7 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. James L. Drought
- Mr. Ian T. Bolden
- Mr. Robert J. Rosenbach

FOR THE PLAINTIFF INTERVENORS:
Mr. Michael S. Christian

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

Mr. Patrick K. Sheehan

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 8th day of October, 2013.



Joanna M. Martinez

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

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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 BERTRAM HAYES-DAVIS
OCTOBER 1, 2013

The original deposition was / was not returned to
the deposition officer on 11-08-13;

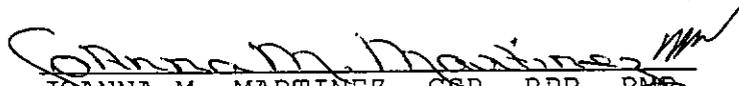
If returned, the attached Changes and Signature page
contains any changes and the reasons therefor;

If returned, the original deposition was delivered
to MR. IAN T. BOLDEN, Custodial Attorney;

That \$ 1600.00 is the deposition officer's
charges to the Plaintiffs 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 12th day of Nov.,
2013.


JOANNA M. MARTINEZ, CSR, RPR, BMR
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

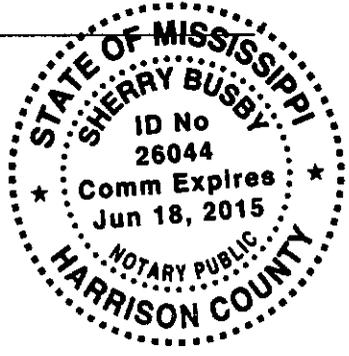
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Before me, Bertram Hayes-Davis, on this day personally appeared BERTRAM HAYES-DAVIS, known to me or proved to me under oath or through 10-30-13, to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this the 30th day of October, 2013.

Sherry Busby

Notary Public in and for the State of _____



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NO. 2010-CI-10977

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

Barbara Kay Griffin

DEPUTY

2013 NOV 15 P 4:50

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

CR

REPORTER'S CERTIFICATION
DEPOSITION OF STEVEN AREA
SEPTEMBER 26, 2013

I, Barbara Kay Griffin, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, STEVEN AREA, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on 10-21-13 to the attorney for Defendants for examination, signature, and return to me by 11-12-13;

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

Robert Rosenbach - 01:50
Michael S. Christian - 00:22
James L. Drought - 00:04

DOCUMENT
SCANNED
AS FILED

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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:

Michael S. Christian, James L. Drought,
Robert Rosenbach, Richard Tinsman,
Attorneys for Plaintiff(s)

David Jed Williams, Attorney for Defendant(s)

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 11 day of October, 2013.

Barbara Kay Griffin
BARBARA KAY GRIFFIN, Texas CSR
Expiration Date: 12/31/14
Firm Registration No. 631
645 Lockhill Selma, Suite 200
San Antonio, Texas 78216
(210) 697-3400



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FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition ~~was~~ was not returned to the deposition officer on 11-08-13;

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

If returned, the original deposition was delivered to ROBERT ROSENBACH, Custodial Attorney;

That \$ 856.20 is the deposition officer's charges to the Plaintiffs 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 12th day of Nov., 2013.

Barbara Kay Griffin By BW
BARBARA KAY GRIFFIN, Texas CSR 2494
Expiration Date: 12/31/14
Firm Registration No. 631
645 Lockhill Selma, Suite 200
San Antonio, Texas 78216
(210) 697-3400

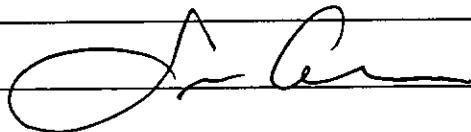
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CHANGES AND SIGNATURE

WITNESS: STEVEN AREA

DATE OF DEPOSITION: 9/26/13

PAGE	LINE	CHANGE	REASON
5	16	^{Passed} bar 1979	corrected
5	14 & 16	^{Graduated} Law School 1978	corrected
5	18	^{Graduated} MBA 1996	corrected
13	24	Darapureddy	spelling
14	3	Darapureddy	spelling correction
71	3	\$ 50,000	\$ left off
88	15	\$ 1.85 million	clarification
90	10-11	AT \$200/acre is the	Corrected
98	14-15	was not addressed; a new lease	
		on the value for a new lease	
			Corrected



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I, STEVEN AREA, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.



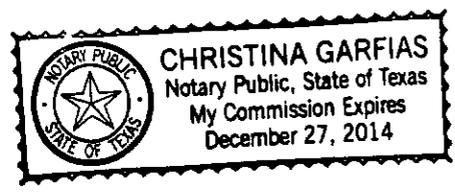
STEVEN AREA, Witness

THE STATE OF Texas)
COUNTY OF Dallas)

Before me, Christina Garfias, on this day personally appeared STEVEN AREA, known to me (or proved to me under oath or through TX Drivers License) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

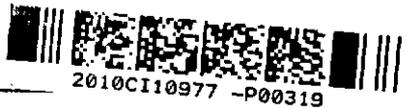
Given under my hand and seal of office this 15th day of November, 2013.

Christina Garfias
Notary Public in and for the State
of Texas.



DOANNA FILED
DISTRICT CLERK
BEXAR COUNTY
2013 NOV 12 AM 11:02
2013 NOV 12 PM 12:02

JOHN BLAZE



DEPUTY
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Sandra [unclear]

(Consolidated Under)

CAUSE NO. 2010-CI-10977

JAC

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3 JOHN K. MEYER, et al * IN THE DISTRICT COURT
4 VS. * 225th JUDICIAL DISTRICT
5 JP ORGAN CHASE BANK, N.A. *
6 INDIVIDUALLY/CORPORATELY *
7 AND AS TRUSTEE OF THE SOUTH *
8 TEXAS SYNDICATE TRUST *
9 and GARY P. AYMES * BEXAR COUNTY, TEXAS

ORAL VIDEO DEPOSITION OF JOHN BLAZE

SEPTEMBER 5, 2013

10 I, LORI M. BRYANT, Certified Shorthand reporter in
11 and for the State of Texas, hereby certify to the
12 following:

13 That the witness, JOHN BLAZE, was
14 duly sworn by the court reporter and that the
15 transcript of the oral deposition is a true record of
16 the testimony given by the witness;

17 That examination and signature of the witness to the
18 deposition transcript was sent to the Mr. Jim L. Flegle,
19 LOEWINSOHN FLEGLE DEARY, LLP, at 12377 Merit Drive, suite
20 900, Dallas, Texas 75251.

21 That the deposition transcript was submitted on
22 10. 7, 2013, to the attorney for the witness,
23 for examination, signature, and return to U.S. Legal
24 Support, Inc., by 10. 30, 2013.

25 That the amount of time used by each party at the

14747

1 Mr. Patrick Sheehan (5 HR 59 MIN)

2 That \$ _____ is the deposition officer's
3 charges to the Defendant for preparing the
4 original deposition transcript and any copies of
5 exhibits;

6 That pursuant to information given to the Deposition
7 Officer at the time said testimony was taken, the
8 following includes counsel for all parties of record:

9 Mr. Jim Flegle, Attorney for Plaintiffs;

10 Mr. Robert Rosenbach, Attorney for Plaintiffs;

11 Mr. James L. Drought, Attorney for Plaintiffs;

12 Mr. Ian T. Bolden, Attorney for Plaintiffs;

13 Mr. Richard Tinsman, Attorney for Plaintiffs;

14 Mr. Patrick K. Sheehan, Attorney for Defendants;

15 Ms. Stephanie L. Curette, Attorney for Defendants;

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

21 Certified to me this 16th day of September,
22 2013.



Lori M. Bryant

23 Lori M. Bryant, CSR, TRR
24 Texas CSR: 4317
25 Expiration 12/31/13
Firm Registration No. 341
U.S. LEGAL SUPPORT

1 FURTHER CERTIFICATION UNDER RULE 203 TCRP

2 The original deposition was/was not returned to the
3 deposition officer on October 30th, 2013.

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

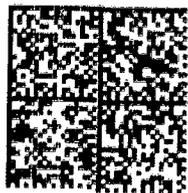
6 If returned, the original deposition was delivered to
7 Stephanie Curette, Custodial Attorney;

8 That \$ 1525.55 is the deposition officer's
9 charges to the Defendants for preparing the original
10 deposition transcript and any copies of exhibits;

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

15 Certified to by me this 10th day of
16 November, 2013.

17
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19 Lori M. Bryant ^{BOAE.}
20 Lori M. Bryant, CSR, TRR
21 Texas CSR: 4317
22 Expiration 12/31/13
23 Firm Registration No. 341
24 U.S. LEGAL SUPPORT
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363 N. Sam Houston Pkwy. E. # 1200
Houston TX 77060



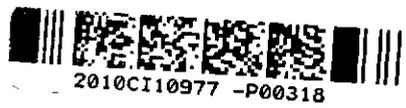
Ms. Margaret G. Montemayor
Bexar County District Clerk
Bexar County Court House, 1st Floor
100 Dolorosa Street
San Antonio, Texas 78205-3028

8Y

DEPUTY

LI 3 P 21 NOV 2012

FILED
KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY



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

1 JOHN K. MEYER, ET. AL. * IN THE DISTRICT COURT
 2 *
 3 *
 4 VS. *
 5 * 225TH JUDICIAL DISTRICT
 6 JP MORGAN CHASE BANK, N.A. *
 7 INDIVIDUALLY/CORPORATELY *
 8 AND AS TRUSTEE OF THE *
 9 SOUTH TEXAS SYNDICATE *
 10 TRUST and GARY P. AYMES * BEXAR COUNTY, TEXAS

GRT

REPORTER'S CERTIFICATION
DEPOSITION OF JOHN K. MEYER
AUGUST 22, 2013

FILED
 JONIA KAY MCKINNEY
 DISTRICT CLERK
 BEXAR COUNTY
 2013 NOV 12 P 3:18
 DEPUTY

Sandra Meyer

2013 NOV 12 2013

I, TRICIA FOX WILLIAMS, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, JOHN K. MEYER, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on 8/30/13 to the witness or to the attorney for the witness for examination, signature and return to me by 9/22/13;

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

MR. PATRICK SHEEHAN - 05 HOURS:51 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:

MR. PATRICK SHEEHAN, Attorney for Defendants
MS. STEPHANIE L. CURETTE, Attorney for Defendants

147144

1 MS. SUSAN P. KRAVIK, Attorney for Defendants
 MR. GEORGE SPENCER, Attorney for Plaintiffs
 2 MR. JAMES DROUGHT, Attorney for Plaintiffs
 MR. IAN BOLDEN, Attorney for Plaintiffs
 3 MR. RICHARD TINSMAN, Attorney for Plaintiffs
 4

5 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
 6 taken, and further that I am not financially or
 otherwise interested in the outcome of the action.
 7

8 Further certification requirements pursuant to
 Rule 203 of TRCP will be certified to after they have
 occurred.
 9

Certified to by me this 29th of August, 2013.



Tricia Williams
 TRICIA FOX WILLIAMS
 Certified Court Reporter

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Certification Number: 8273
 Date of Expiration: 12/31/2013
 Firm Registration Number: 341
 Business Address:
 U.S. Legal Support
 363 N. Sam Houston Pkwy E.
 Suite 1200
 Houston, Texas 77060
 (210) 734-7127

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FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition was was not returned to the deposition officer on September 19, 2013 ;

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

If returned, the original deposition was delivered to Patrick Sheehan, Custodial Attorney;

That \$1,635-45 is the deposition officer's charges to the Defendant 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 on and filed with the Clerk.

Certified to by me this 29th day of August, 2013.

Tricia Williams
TRICIA FOX WILLIAMS
Certified Court Reporter

Certification Number: 8273
Date of Expiration: 12/31/2013
Firm Registration Number: 341
Business Address:
U.S. Legal Support
363 N. Sam Houston Pkwy E.
Suite 1200
Houston, Texas 77060
(210) 734-7127

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I, JOHN K. MEYER, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

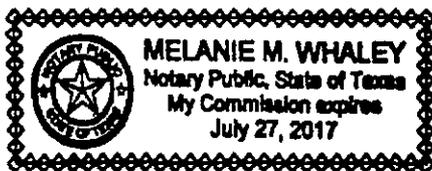
John K. Meyer

JOHN K. MEYER

THE STATE OF TEXAS:
COUNTY OF BEXAR:

Before me, John K. Meyer, on this day personally appeared JOHN K. MEYER, known to me (or proved to me under oath or through TX DL) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this 19th day of September, 2013.



Melanie M. Whaley

NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

ORIGINAL

(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO WM TX ENERGY RESOURCES, LLC

Plaintiffs serve upon:

C T Corporation System
350 N. St. Paul Street, Suite 2900
Dallas, Texas 75201

Registered Agent for:

WM TX Energy Resources, LLC
1001 Fannin, Suite 4000
Houston, Texas 77002

Abigail K. McKinney

DEPUTY

2013 NOV -6 A 10:13

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request WM TX Energy Resources, LLC produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon WM TX Energy Resources, LLC after the expiration of ten

(10) days from service of this Notice.

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 4 day of November, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the

disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.

- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Assignment of Oil and Gas Lease from GulfTex Energy LLC (Assignor) to WM TX Energy Resources, LLC (Assignee) dated on or about December 13, 2010 conveying an interest in the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUESTS FOR PRODUCTION NO. 2: Please produce documentation reflecting the consideration paid for the Assignment of Oil and Gas Lease from GulfTex Energy LLC (Assignor) to WM TX Energy Resources, LLC (Assignee) dated on or about December 13, 2010 conveying an interest in the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:



(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO EBG RESOURCES, LLC**

Plaintiffs serve upon:

**Roger L. Jarvis, Registered Agent
EBG Resources, LLC
24 Waterway Avenue, Suite 1000
Woodlands, Texas 77380**

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request EBG Resources, LLC produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon EBG Resources, LLC after the expiration of ten (10) days from service of this Notice.

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY
2013 NOV - 6 A 10:13
DEPUTY
Donna Kay McKinney

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 4 day of November, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Partial Assignment of Oil and Gas Lease between BB-Operating LP and Whittier Energy Company (Assignors) and Common Resources, LLC (Assignee) dated February 3, 2009 conveying an interest in the "STS Extension Lease", more particularly described as the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please produce documentation reflecting the consideration paid for the Partial Assignment of Oil and Gas Lease between BB-Operating LP and Whittier Energy Company (Assignors) and Common Resources, LLC (Assignee) dated February 3, 2009 conveying an interest in the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUESTS FOR PRODUCTION NO. 3: Please produce the Assignment from Common Resources (Assignor) to II Common, LP (Assignee) conveying an interest in the "STS Extension Lease" dated on or about May 11, 2010, more particularly described as the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUESTS FOR PRODUCTION NO. 4: Please produce documentation reflecting the consideration paid for the Assignment from Common Resources (Assignor) to II Common, LP (Assignee) conveying an interest in the "STS Extension Lease" dated on or about May 11, 2010, more particularly described as the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy

Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: Please produce the Assignment from Common Resources (Assignor) to II Common, LP (Assignee) conveying an interest in the "STS A Lease" dated on or about May 11, 2010, more particularly described as the lease between South Texas Syndicate (Lessor) and Petrohawk Properties, LP dated December 12, 2008 dated covering 15,456.66 acres in LaSalle and McMullen Counties, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: Please produce documentation reflecting the consideration paid for the Assignment from Common Resources (Assignor) to II Common, LP (Assignee) conveying an interest in the "STS A Lease" dated on or about May 11, 2010, more particularly described as the lease between South Texas Syndicate (Lessor) and Petrohawk Properties, LP dated December 12, 2008 dated covering 15,456.66 acres in LaSalle and McMullen Counties, Texas.

RESPONSE:

(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO STATOIL TEXAS ONSHORE PROPERTIES, LLC**

Plaintiffs serve upon:

Capital Corporate Services, Inc.
800 Brazos, Suite 400
Austin, Texas 78701

Registered Agent for:

StatOil Texas Onshore Properties, LLC
2101 City West Boulevard, Building 4, 8th Floor
Houston, Texas 77042

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY
2013 NOV -6 A 10:13
DEPUTY
Donna Kay McKinney

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request StatOil Texas Onshore Properties, LLC produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon StatOil Texas Onshore Properties, LLC after

the expiration of ten (10) days from service of this Notice.

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
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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:

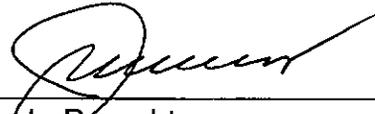
U.S. Certified Mail, Return Receipt Requested to:
 Facsimile to:
 First Class Mail to:
 Hand Delivery to:

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 4 day of November, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Assignment of Oil and Gas Lease between Talisman Energy USA, Inc. (Assignor) and StatOil Texas Onshore Properties, LLC (Assignee) dated on or about November 23, 2010 conveying an interest in the "STS Extension Lease", more particularly described as the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please produce documentation reflecting the consideration paid for the Assignment of Oil and Gas Lease between Talisman Energy USA, Inc. (Assignor) and StatOil Texas Onshore Properties, LLC (Assignee) dated on or about November 23, 2010 conveying an interest in the "STS Extension Lease", more particularly described as the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Please produce the Assignment of Oil and Gas Lease between Talisman Energy USA, Inc. (Assignor) and StatOil Texas Onshore Properties, LLC (Assignee) dated on or about November 23, 2010 conveying an interest in the "STS A Lease", more particularly described as the lease between South Texas Syndicate (Lessor) and Petrohawk Properties, LP (Lessee) dated December 12, 2008 dated covering 15,456.66 acres in LaSalle and McMullen Counties, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Please produce documentation reflecting the consideration paid for the Assignment of Oil and Gas Lease between Talisman Energy USA, Inc. (Assignor) and StatOil Texas Onshore Properties, LLC (Assignee)

dated on or about November 23, 2010 conveying an interest in the "STS A Lease", more particularly described as the lease between South Texas Syndicate (Lessor) and Petrohawk Properties, LP (Lessees) dated December 12, 2008 dated covering 15,456.66 acres in LaSalle and McMullen Counties, Texas.

RESPONSE:

(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO BP AMERICA PRODUCTION COMPANY**

Plaintiffs serve upon:

C T Corporation System
350 N. St. Paul St., Ste. 2900
Dallas, Texas 75201

Registered Agent for:

BP American Production Company
P.O. Box 1036
Warrenville, Illinois 60555

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY
2013 NOV -6 A 10:12
DEPUTY
Adrian K. ...

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request BP American Production Company produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon BP American Production Company after the expiration of ten

(10) days from service of this Notice.

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.**

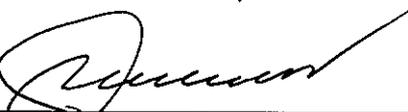
Richard Tinsman
State Bar No. 20064000
Sharon C. Savage
State Bar No. 0474200
TINSMAN & SCIANO, INC.
10107 McAllister Fwy
San Antonio, Texas 78216
Telephone: (210) 225-3121
Facsimile: (210) 225-6235

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 4 day of November, 2013.


James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Asset Exchange Agreement between BlueStone Natural Resources, LLC and BP America Production Company dated April 18, 2011.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please produce documentation reflecting what consideration was paid to acquire your interest in the Oil and Gas Lease between the South Texas Syndicate (Lessor) and Petrohawk Properties, LP (Lessee) dated December 12, 2008.

RESPONSE:

(Consolidated Under)
2010-CI-10977

JOHN K. MEYER, ET AL.,
Plaintiff,

vs.

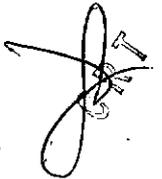
JP MORGAN CHASE BANK, N.A.
INDIVIDUALLY/CORPORATELY
AND AS TRUSTEE OF THE SOUTH
TEXAS SYNDICATE TRUST
and GARY P. AYMES,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS



**PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO TALISMAN ENERGY USA, INC.**

Plaintiffs serve upon:

C T Corporation System
350 N. St. Paul St. Ste. 2900
Dallas, Texas 75201

Registered Agent for:

Talisman Energy USA, Inc.
337 Daniel Zenker Drive
Horseheads, NY 14845

Donna Kay McKinney

DEPUTY

2013 NOV -6 A 10:12

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request Talisman Energy USA, Inc. produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon Talisman Energy USA, Inc. after the expiration of ten (10)

days from service of this Notice.

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.**

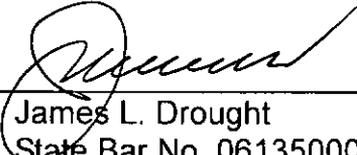
Jim L. Flegle
State Bar No. 07118600
LOEWINSOHN FLEGLE DEARY, L.L.P.
12377 Merit Dr., Suite 900
Dallas, Texas 75251
(214) 572-1700 - Telephone
(214) 572-1717 - Facsimile
**ATTORNEYS FOR PLAINTIFFS,
EMILIE BLAZE, ET AL.**

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
Mr. Kelly M. Walne
Boyer Short, A Professional Corporation
Nine Greenway Plaza, Suite 3100
Houston, Texas 77046

on this the 1st day of November, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.
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NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Assignment from Common Resources, LLC (Assignor) to Talisman Energy USA, Inc. (Assignee) dated on or about May 11, 2010 conveying an interest in the "STS Extension Lease", more particularly described as the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

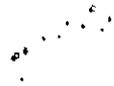
REQUEST FOR PRODUCTION NO. 2: Please produce documentation reflecting what consideration was paid for the Assignment from Common Resources, LLC (Assignor) to Talisman Energy USA, Inc. (Assignee) dated on or about May 11, 2010 conveying an interest in the "STS Extension Lease", more particularly described as the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Please produce the Assignment from Common Resources, LLC (Assignor) to Talisman Energy USA, Inc. (Assignee) dated on or about May 11, 2010 conveying an interest in the "STS A Lease", more particularly described as the lease between South Texas Syndicate (Lessor) and Petrohawk Properties, LP (Lessees) dated December 12, 2008 dated covering 15,456.66 acres in LaSalle and McMullen Counties, Texas.

RESPONSE:

REQUESTS FOR PRODUCTION NO. 4: Please produce documentation reflecting what consideration was paid for the Assignment from Common Resources, LLC (Assignor) to Talisman Energy USA, Inc. (Assignee) dated on or about May 11, 2010 conveying an interest in the "STS A Lease", more particularly described as the lease between South Texas Syndicate (Lessor) and Petrohawk Properties, LP (Lessee) dated December 12, 2008 dated covering 15,456.66 acres in LaSalle and McMullen



Counties, Texas.

RESPONSE:

(Consolidated Under)
2010-CI-10977

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,
Defendants.

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IN THE DISTRICT COURT

225TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

PLAINTIFFS' NOTICE OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO GULFTEX ENERGY, LLC

Plaintiffs serve upon:

Brad Jauer, Registered Agent
GulfTex Energy, LLC
18615 Tuscany Stone, Suite 340
San Antonio, Texas 78258

Handwritten signature: Donna Kay McKinney

DEPUTY

FILED
DONNA KAY MCKINNEY
DISTRICT CLERK
BEXAR COUNTY
2013 NOV -6 A 10:12

Pursuant to Rule 205 of the Texas Rules of Civil Procedure, Plaintiffs request GulfTex Energy, LLC produce for inspection and copying all documents responsive to the Requests attached hereto at 10:00 a.m. on November 23, 2013 at the law offices of Drought, Drought, & Bobbitt, LLP (or another mutually agreed upon location), 112 E. Pecan St., Suite 2900, San Antonio, Texas 78205. Plaintiffs will serve a Subpoena upon GulfTex Energy, LLC after the expiration of ten (10) days from service of this Notice.

Respectfully submitted,

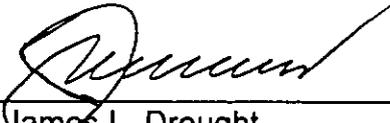
John B. Massopust (*pro hac vice*)
Matthew J. Gollinger (*pro hac vice*)
ZELLE HOFMANN VOELBEL & MASON LLP
500 Washington Avenue South, Suite 4000
Minneapolis, Minnesota 55415-1152
(612) 339-2020 - Telephone
(612) 336-9100 - Facsimile
**ATTORNEYS FOR INTERVENOR-PLAINTIFFS,
LINDA ALDRICH, ET AL.**

Jim L. Flegle
State Bar No. 07118600
LOEWINSOHN FLEGLE DEARY, L.L.P.
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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
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Mr. John C. Eichman
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Mr. Fred W. Stumpf
Mr. Kelly M. Walne
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on this the 1 day of November, 2013.



James L. Drought

INSTRUCTIONS

- a. For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reason(s) for the disappearance. Also, identify each person having knowledge about the disposition or loss and identify each document evidencing the existence or nonexistence of each document that cannot be located.
- b. Each Request below includes a request for production of data and/or information that exists in electronic and/or magnetic form. All responsive data and/or information that exists in electronic or magnetic form should be: (i) copied to a CD-ROM, DVD-ROM, or other external storage device in its native format (i.e., the format in which such data and/or information that exists in electronic and/or magnetic form was created, maintained, and/or used in the ordinary course of business) with all metadata intact; and (ii) produced in bates numbered form either (a) printed on paper or (b) electronically in either PDF or TIFF format. If any electronic or magnetic data requested cannot be produced in the form requested, please state the form in which information is regularly kept and/or can be produced.

NOTICE OF PROTECTIVE ORDER

An Agreed Protective Order has been entered in this case whereby documents produced in the case can be designated confidential. A copy of the Agreed Protective Order will be provided to you upon request.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce the Partial Assignment of Oil and Gas Lease from BB-II Operating LP (Assignor) to GulfTex Energy LLC (Assignee) dated August 1, 2009 conveying an interest in the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please produce documentation reflecting the consideration paid for the Partial Assignment of Oil and Gas Lease from BB-II Operating LP (Assignor) to GulfTex Energy LLC (Assignee) dated August 1, 2009 conveying an interest in the lease between the South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Please produce the Partial Assignment of Oil and Gas Lease from Whittier Energy Company (Assignor) to GulfTex Energy, LLC (Assignee) dated April 1, 2010 conveying an interest in the lease between South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Please produce documents reflecting the consideration paid for the Partial Assignment of Oil and Gas Lease from Whittier Energy Company (Assignor) to GulfTex Energy, LLC (Assignee) dated April 1, 2010 conveying an interest in the lease between South Texas Syndicate (Lessor) and BB-II Operating LP and Whittier Energy Company (Lessees) dated January 29, 2009 but effective February 1, 2009 covering 9,416 acres in LaSalle County, Texas.

RESPONSE: