

# EXHIBIT A

# GLAST, PHILLIPS & MURRAY

A PROFESSIONAL CORPORATION

ATTORNEYS AND  
COUNSELORS

**MELINDA H. SIMS**  
(972) 419-7174  
msims@gpm-law.com

14801 QUORUM DRIVE SUITE 500  
DALLAS, TX 75254-1449  
(972) 419-8300  
TELECOPIER (972) 419-8329

HOUSTON  
(713) 237-3111

October 21, 2011

**CMRRR # 7010 0290 0000 4548 5876**

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

**CMRRR # 7010 0290 0000 4548 5883**

Mr. James Albert Jennings  
Erhard & Jennings, P.C.  
1601 Elm Street, Suite 4242  
Dallas, Texas 75201

**CMRRR # 7010 0290 0000 4548 5890**

Mr. Michael L. Graham  
The Graham Law Firm, P.C.  
100 Highland Park Village, Suite 200  
Dallas, Texas 75205

Re: Cause No. PR-11-3238-3; *In Re: Estate of Max D. Hopper, Deceased/ Jo N. Hopper v. JPMorgan Chase, N.A., Stephen Hopper, and Laura Wassmer*; In the Probate Court No. 3, Dallas County, Texas.

Dear Counsel:

Enclosed is a copy of Stephen Hopper's and Laura Wassmer's Responses to Jo N. Hopper's Request for Disclosure in the above-referenced matter.

Very truly yours,

**GLAST, PHILLIPS & MURRAY, P.C.**

By: Melinda H. Sims  
Melinda H. Sims, Esq.

IN RE: ESTATE OF	§	IN THE PROBATE COURT
	§	
MAX D. HOPPER,	§	NO. 3
	§	
DECEASED	§	DALLAS COUNTY, TEXAS

**STEPHEN HOPPER'S AND LAURA WASSMER'S RESPONSES TO JO N. HOPPER'S  
REQUEST FOR DISCLOSURE**

TO: Jo N. Hopper, by and through her attorneys of record, James Albert Jennings, Erhard & Jennings, P.C., 1601 Elm Street, Suite 4242, Dallas, Texas 75201, and Michael Graham, The Graham Law Firm, P.C., 100 Highland Park Village, Suite 200, Dallas, Texas 75205.

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Stephen Hopper and Laura Wassmer serve their Responses to Jo No. Hopper's Request for Disclosure as follows:

- 1. Rule 194.2(a): State the correct names of the parties to the lawsuit.**

**RESPONSE:**

Stephen B. Hopper

Laura Wassmer

Jo N. Hopper

JPMorgan Chase Bank, N.A., in its capacity as Independent Administrator of the Estate of Max D. Hopper, Deceased, and individually (in its corporate capacity)

- 2. Rule 194.2(b): State the name, address, and telephone number of any potential parties to the lawsuit.**

**RESPONSE:**

No other parties are known to Stephen B. Hopper and Laura Wassmer.

**3. Rule 194.2(c): State the legal theories and, in general, the factual bases of the responding party's claim or defenses.**

**RESPONSE:**

The legal theories and, in general, the factual bases of Stephen Hopper's and Laura Wassmer's claims and defenses are as follows:

**Inventory and Estate Administration**

The Inventory, Appraisement, and List of Claims filed by JPMorgan Chase Bank, N.A., as Independent Administrator ("Independent Administrator") of the Estate of Max D. Hopper, Deceased (the "Estate"), is incorrect. The Independent Administrator has failed to act with due diligence and filed an incorrect Inventory, Appraisement, and List of Claims. These errors include but are not limited to (a) failing to include items on the Inventory that belong to the Estate, (b) mischaracterizing the separate and community property nature of the assets, and (c) listing incorrect values for assets.

Because of the Independent Administrator's lack of due diligence and its errors in compiling the Inventory, Appraisement, and List of Claims, there might be additional errors in the Inventory, Appraisement, and List of Claims.

Further, counsel for the Independent Administrator has represented that the Inventory, Appraisement, and List of Claims is still a work in progress, meaning that the Independent Administrator incorrectly swore that the Inventory, Appraisement, and List of Claims is the Estate's complete Inventory, Appraisement, and List of Claims.

In addition, Stephen B. Hopper and Laura Wassmer object to Jo Hopper's claims that various Estate assets are Jo Hopper's separate property because such assets (a) are not separate property purchases or gifts and/or (b) there is insufficient evidence that such assets are Jo Hopper's separate property.

The above actions and inactions necessitated the filing of objections to the Inventory, Appraisal, and List of Claims by the Estate beneficiaries.

Stephen B. Hopper and Laura Wassmer incorporate herein by reference "Laura Wassmer's and Stephen Hopper's Objection to Inventory, Appraisal, and List of Claims" and all amendments and supplements thereto on file with the Court now or hereafter, as if set forth verbatim herein.

Stephen B. Hopper and Laura Wassmer further incorporate herein by reference their Interrogatory responses in Cause No. PR-10-1517-3, as if set forth verbatim herein.

### **Robledo Property**

The Robledo Property (house located at 9 Robledo Drive, Dallas, Texas 75230) should be distributed either by agreement of Jo Hopper, Stephen Hopper, and Laura Wassmer, or as part of a partition and distribution of the Estate under Texas Probate Code Sections 150 and 380. Under those statutes, the Robledo Property should be partitioned to Jo Hopper, who has chosen to exercise her homestead right, and Stephen Hopper and Laura Hopper should receive other estate assets that are equivalent in value to the fair market value of the Robledo Property (without any diminishment in value based on the homestead). If there are insufficient assets remaining in the Estate due to the Independent Administrator partitioning and distributing such assets prematurely and without court authority, then the Independent Administrator should retrieve such distributed assets from Jo Hopper so that a fair and equitable distribution results.

How the mortgage on the Robledo Property should be treated is dependent in part on whether the creditor requests that the debt be allowed and approved as a matured secured claim, or allowed, approved, and fixed as a preferred debt and lien, pursuant to Texas Probate Code Section 306. To

Stephen Hopper's and Laura Wassmer's knowledge, the creditor has not designated how it wants the debt to be treated.

### **Jo Hopper's Request for Reimbursement**

Expenses associated with the Robledo Property should be paid by Jo Hopper for the period after Decedent's death because of her responsibilities as the homestead occupant and because the Robledo Property should be partitioned and distributed to her, with equally valued assets to be distributed to Stephen Hopper and Laura Wassmer.

Stephen Hopper and Laura Wassmer are in the process of determining the amount to which Jo Hopper may or may not be entitled to reimbursement for other expenses for which she seeks reimbursement from the Estate, and will supplement their responses as further information is provided to them.

### **Family Allowance**

No family allowance should be paid to Jo Hopper unless it is shown that Jo Hopper had insufficient assets for her support for the one year following the Decedent's death, pursuant to Texas Probate Code Sections 286 *et seq.*

### **Allocation of Independent Administrator's Fees and Expenses**

The Independent Administrator should allocate its fees and expenses between the Estate and Jo Hopper, as the surviving spouse with a one-half interest in the Decedent's and Jo Hopper's community property that is being administered by the Independent Administrator. The Independent Administrator's fees and expenses should be allocated between the Estate and Jo Hopper in accordance with the extent to which the administrative work was for the benefit of or with respect to the Estate and/or Jo Hopper's one-half interest in community property.

## **Allocation of Basis**

The basis adjustment of \$1.3 million available to estates of 2010 decedents whose personal representatives elect carryover basis treatment should be allocated in full to the assets of the Estate that ultimately pass to Stephen Hopper and Laura Wassmer, rather than allocated in part (or full) to assets that are ultimately distributed or allocated as part of Jo Hopper's community property interest in the Estate. Jo Hopper has a spousal basis adjustment of \$3 million available that may be allocated exclusively to assets constituting her community property share.

**4. Rule 194.2(d): State the amount and any method of calculating economic damages.**

**RESPONSE:**

The Inventory, Appraisement, and List of Claims should be corrected so that Stephen B. Hopper and Laura Wassmer receive the assets and value of assets to which they are entitled as beneficiaries of the Estate.

The Decedent's assets should be partitioned and distributed equitably among Jo Hopper, Stephen Hopper, and Laura Hopper pursuant to agreement of those parties or otherwise through partition and distribution under Texas Probate Code Sections 150 and 380.

If JPMorgan Chase Bank, N.A. has improperly reimbursed Jo Hopper out of the Estate, then such disbursements should be returned to the Estate.

The Independent Administrator's allocation of its fees and expenses solely to the Estate should be changed to an allocation between the Estate and Jo Hopper, as explained in Paragraph "3" above, to avoid economic damage to the Estate, Stephen Hopper, and Laura Wassmer.

Stephen B. Hopper and Laura Wassmer have incurred reasonable and necessary attorneys' fees, expenses, and costs in this proceeding. Stephen B. Hopper and Laura Wassmer are entitled to

reimbursement from JPMorgan Chase Bank, N.A. of their reasonable and necessary attorneys' fees, expenses, and costs of this proceeding because they have had to hire attorneys to conduct work that the Independent Administrator has failed to do and to correct the Independent Administrator's errors. Further, if successful, Stephen B. Hopper and Laura Wassmer will be entitled to recover from opposing parties (which may include JPMorgan Chase Bank, N.A. and Jo N. Hopper) all costs incurred in this proceeding, pursuant to Texas Rule of Civil Procedure 131. Stephen Hopper and Laura Wassmer are also entitled to reimbursement of their attorneys' fees, expenses, and costs pursuant to Texas Civil Practice & Remedies Code Section 37.009.

JPMorgan Chase Bank, N.A. is not entitled to charge the Estate or its beneficiaries for the attorneys' fees, expenses, and costs that it incurs in the estate administration and litigation where such fees were not necessary and were not reasonable. JPMorgan Chase Bank, N.A. has incurred attorneys' fees, expenses, and costs that are not necessary and are not reasonable due to its lack of due diligence and incorrect administration of the Estate, including but not limited to the incorrect Inventory, Appraisement, and List of Claims, court proceedings associated with its lack of due diligence and errors, incorrect partition and distribution of estate assets without court authority, incorrect positions taken on the proper way to partition and distribute remaining estate assets (including the Robledo Property and its contents), and its allocation of administration expenses to the Estate.

JPMorgan Chase Bank, N.A. is not entitled to charge the Estate or its beneficiaries for fiduciary fees that are associated with JPMorgan Chase Bank, N.A.'s lack of due diligence, incorrect administration of the Estate, incorrect compiling of the Inventory, Appraisement, and List of Claims, and the court proceedings connected with those actions and inactions.



JPMorgan Chase Bank, N.A. should not charge the Estate for the fiduciary fees that are for the benefit of Jo Hopper's community property and separate property interests.

**5. Rule 194.2(e): State the name, address, and telephone number of each person having knowledge of relevant facts, and provide a brief statement of each identified person's connection with the case.**

**RESPONSE:**

Jo N. Hopper  
9 Robledo Drive  
Dallas, Texas 75230  
(214) 696-5621

Surviving spouse of Decedent Max D. Hopper

Laura Wassmer  
8005 Roe Avenue  
Prairie Village, Kansas 66208

Surviving adult child of Decedent Max D. Hopper

Stephen B. Hopper  
501 NW 41<sup>st</sup> Street  
Oklahoma City, Oklahoma 73118

Surviving adult child of Decedent Max D. Hopper

Sarah Williamson  
5646 Milton, Suite 920  
Dallas, Texas 75206  
(214) 361-2509

Accountant for Decedent Max D. Hopper, Jo N. Hopper, and Estate of Max D. Hopper, Deceased

Susan Novak  
Other personnel  
JPMorgan Chase Bank, N.A.  
2200 Ross Avenue, 5<sup>th</sup> Floor  
Dallas, Texas 75201  
(214) 965-3465

Officers and employees who have worked on the administration of the Estate of Max D. Hopper,  
Deceased

Gary Stolbach  
Melinda H. Sims  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Suite 500  
Dallas, Texas 75254-1449  
(972) 419-8300

Attorneys for Stephen B. Hopper and Laura Wassmer

Lyle D. Pishny  
Lathrop & Gage LLP  
Building 82, Suite 1000  
10851 Mastin Boulevard  
Overland Park, Kansas 66210-1669  
(913) 451-5100

Attorneys for Stephen B. Hopper and Laura Wassmer

Thomas H. Cantrill  
John C. Eichman  
Hunton & Williams LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202-2799  
(214) 468-3311

Attorneys for JPMorgan Chase Bank, N.A., and former attorneys for Decedent Max D. Hopper and  
Jo N. Hopper

James Albert Jennings  
Kenneth B. Tomlinson  
Erhard & Jennings, P.C.  
1601 Elm Street, Suite 4242  
Dallas, Texas 75201  
(214) 720-4001

Attorneys for Jo N. Hopper

Michael L. Graham  
Janet P. Strong  
The Graham Law Firm, P.C.  
100 Highland Park Village, Suite 200  
Dallas, Texas 75205  
(214) 599-7000

Attorneys for Jo N. Hopper

Martah Byars

Affiant for Proof of Death

Celia Doris King  
1045 d'Or Drive  
Dallas, Texas 75230  
(214) 334-7570

Affiant for Proof of Death and Decedent Max. D. Hopper's personal assistant

Marilyn J. Hickethier

Former wife of Decedent Max D. Hopper

James J. Hartnett, Sr.  
The Hartnett Law Firm  
2920 North Pearl Street  
Dallas, Texas 75201  
(214) 742-4655

Attorney Ad Litem for unknown heirs of Decedent Max D. Hopper

David M. Taylor  
Thompson Coe Cousins & Iron L.L.P.  
700 N. Pearl, 25<sup>th</sup> Floor  
Dallas, Texas 75201

Attorneys for Sarah Williamson

Michael van den Akker  
Baker Street Advisors  
50 Fremont Street, 16<sup>th</sup> Floor  
San Francisco, California 94105  
(415) 344-6182

Wealth Manager for Decedent Max D. Hopper and Jo N. Hopper

Judy Poole  
1715 Badford  
Irving, Texas 75061  
(972) 254-7433

Jo N. Hopper's sister and has knowledge of assets owned by Decedent Max D. Hopper and/or Jo N. Hopper

Eula & Bill Malson  
79 N. Floral Leaf Circle  
The Woodlands, Texas 77381  
(936) 321-3872

Friends of Jo N. Hopper and have knowledge of assets owned by Decedent Max D. Hopper and/or Jo N. Hopper

Kathy Holman  
1820 Weanne Drive  
Richardson, Texas 75082  
(972) 497-9393

Friend of Jo N. Hopper and has knowledge of assets owned by Decedent Max D. Hopper and/or Jo N. Hopper

Ann Fortescue  
801 Box Canyon Road  
Wimberly, Texas 78676  
(214) 679-6765

Interior decorator and has knowledge of assets owned by Decedent Max D. Hopper and/or Jo N. Hopper

Bob Banks  
Banks Fine Art  
1313 Slocum Street  
Suite 103  
Dallas, Texas 75207  
(214) 352-1811

Art dealer and has knowledge of art located at 9 Robledo Drive, Dallas, Texas 75230

Carol Matesic  
P.O. Box 12824  
Dallas, Texas 75225  
(214) 244-0903

Tangible property appraiser who appraised home contents and business warehouse contents

Brenda Simonson-Mohle  
Signet Art  
2644 Newcastle Drive  
Carrollton, Texas 75007  
(972) 306-1963

Art appraiser who appraised artwork of the Estate of Max D. Hopper, Deceased

Susan Sturdivant  
Highland Park Appraisals  
5326 Ridgedale  
Dallas, Texas 75206  
(214) 522-0460

Appraised needlework

Gary Matesic  
P.O. Box 12824  
Dallas, Texas 75225  
(214) 7040-3352

Car appraiser who appraised automobiles of the Estate of Max D. Hopper, Deceased

DW Skelton  
5952 Royal Lane, Suite 114  
Dallas, Texas 75230  
(214) 265-1037

Appraised 9 Robledo Drive, Dallas, Texas 75230

Diane Teitelbaum  
10118 Van Dyke Road  
Dallas, Texas 75218  
(214) 213-9098

Wine appraiser who appraised wine stored at 9 Robledo Drive, Dallas, Texas 75230

Rives McBee  
19 Canyon Oak  
Irving, Texas 75061  
(972) 254-6969

Retired professional golfer from the PGA who appraised Decedent Max D. Hopper's golf collection

Margaret Gronberg  
5924 Royal Lane, Suite 170  
Dallas, Texas 75230  
(214) 369-5361

Jewelry appraiser hired to appraise jewelry

Chris Lane  
Heritage Galleries  
3500 Maple Avenue, 17<sup>th</sup> Floor  
Dallas, Texas 75219  
(214) 409-1243

Appraised coins of Decedent Max D. Hopper

Todd Imhof  
Heritage Galleries  
3500 Maple Avenue, 17<sup>th</sup> Floor  
Dallas, Texas 75219  
(214) 409-1243

Appraised coins of Decedent Max D. Hopper

Chuck Furjanic  
3405 Briarcliff Court S  
Irving, Texas 75062-3289  
(972) 822-1826

Coin and golf appraiser who referred golf club appraisal to Rives McBee

Matthew Orsini  
Spink Smythe  
3100 Monticello Avenue, Suite 925  
Dallas, Texas 75205  
(800) 556-7826

Coin appraiser who appraised coins of the Estate of Max D. Hopper, Deceased

All persons with knowledge of relevant facts who are designated by any other party in this matter.

**6. Rules 194.2(f): For any testifying expert:**

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

**RESPONSE:**

Gary Stolbach, Esq.  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Suite 500  
Dallas, Texas 75205  
(972) 419-8300

Mark C. Enoch, Esq.  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Suite 500  
Dallas, Texas 75205  
(972) 419-8300

Melinda H. Sims, Esq.  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Suite 500  
Dallas, Texas 75205  
(972) 419-8300

Mr. Stolbach, Mr. Enoch, and Ms. Sims may testify as expert witnesses concerning the reasonableness, necessity, and reimbursement of the attorneys' fees and expenses incurred by Stephen B. Hopper and Laura Wassmer in this estate administration and litigation. The subject matter on which Mr. Stolbach, Mr. Enoch, and Ms. Sims will testify, and the general substance of their mental impressions and opinions and a brief summary of the basis for them, include the following: The necessity and reasonableness of the attorneys' fees incurred by Stephen B. Hopper and Laura Wassmer in this legal matter, including the hours worked by the attorneys, the amount the attorneys charged per hour, a description of the work performed by the attorneys, that the work was necessary to the prosecution and defense of the case, that the attorneys' fees are reasonable, the time and labor required, the novelty and difficulty of the questions involved, the skill required to perform the legal services properly, the likelihood that the acceptance of the employment prevented other employment by the attorneys, the fee customarily charged in the locality for similar legal services, the amount involved and the results obtained, the time limitations imposed by the client or by the circumstances, the nature and length of the professional relationships with the client, the experience, reputation, and ability of the attorneys performing the services, whether the fee is fixed or contingent on results obtained, and the uncertainty of collection before the legal services have been rendered.

Mr. Stolbach's, Mr. Enoch's, and Ms. Sims' current resumes and bibliographies are attached hereto as Exhibits A, B, and C.



7. Rules 194.2(g): Produce any discoverable indemnity and insuring agreements;

**RESPONSE:**

None.

8. Rules 194.2(h): Produce any discoverable settlement agreements;

**RESPONSE:**

None.

9. Rules 194.2(I): Produce any discoverable witness statements.

**RESPONSE:**

None.

Respectfully submitted,

GLAST, PHILLIPS & MURRAY, P.C.

By: Melinda H. Sims  
GARY STOLBACH  
State Bar No. 19277700  
MARK C. ENOCH  
State Bar No. 06630360  
MELINDA H. SIMS  
State Bar No. 24007388

GLAST, PHILLIPS & MURRAY, P.C.  
14801 Quorum Drive  
Suite 500  
Dallas, Texas 75254-1449  
Phone: (972) 419-8312  
Fax: (972) 419-8329

ATTORNEYS FOR STEPHEN HOPPER  
AND LAURA WASSMER


**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 21<sup>st</sup> day of October, 2011, a true and correct copy of the above and foregoing document was sent by the method indicated to the following:

Mr. John C. Eichman  
Hunton & Williams  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202  
***Via Certified Mail, Return Receipt Requested # 7010 0290 0000 4548 5876***

Mr. James Albert Jennings  
Gerhard & Jennings, P.C.  
1601 Elm Street, Suite 4242  
Dallas, Texas 75201  
***Via Certified Mail, Return Receipt Requested # 7010 0290 0000 4548 5883***

Mr. Michael L. Graham  
Ms. Janet P. Strong  
The Graham Law Firm, P.C.  
100 Highland Park Village, Suite 200  
Dallas, Texas 75205  
***Via Certified Mail, Return Receipt Requested # 7010 0290 0000 4548 5890***

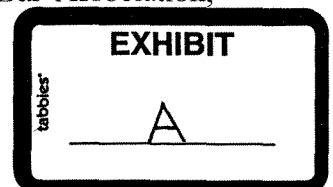
  
\_\_\_\_\_  
MELINDA H. SIMS

## Gary Stolbach

Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Suite 500  
Dallas, Texas 75254-1449

Tel: 972.419.8312  
Fax: 972.419.8329  
stolbach@gpm-law.com

Professional certification:	Board certified in Estate Planning and Probate Law, Texas Board of Legal Specialization (since 1994). Licensed to practice law in Texas, 1978; licensed to practice law in Pennsylvania, 1976.
Professional experience:	Practicing attorney in the area of complex estate planning, probate and trust since 1976. Former chairman of the estate planning section of a major regional law firm; former chairman of the Texas estate planning section of a major international law firm.
Professional memberships:	Member of the American College of Trust and Estate Counsel (ACTEC) since 1994. Member of the American, Texas and Dallas Bar Associations (former council member), Real Property, Probate and Trust Section. Member of the Dallas Estate Planning Council (former council member).
Education:	University of Pennsylvania Law School J.D., 1976  University of Pennsylvania B.A., 1971; Phi Beta Kappa
Speeches, papers, articles:	Numerous speaking engagements, including:  Property and Estate Planning Issues: Characterization and Attacking Family Trusts, Family Limited Partnerships, etc., State Bar of Texas Advanced Family Law Course - 2003  Asserting Community Property Claims: Complex Trust Issues; State Bar of Texas Advanced Family Law Course - 2002  Probate Claims and Hidden Fiduciary Liability, Dallas Bar Association,



Section of Probate, Trusts and Estates (Speech Outline, February 1989)

Publication: Journal of Partnership Taxation; New Estate Freeze Rules: Gift Leveraging Can Achieve Estate Planning Objectives; Summer, 1991.

Publication: Journal of Partnership Taxation; New Estate Freeze Rules: Practical Issues for Gift Leveraging; Volume 8, 1992.

# GPM - Glast, Phillips & Murray: A Professional

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## MARK C. ENOCH

**E-mail:** fly63rc@verizon.net

**Location:** Dallas Office

**Telephone:** (972) 419-8366

**Contact Mark C. Enoch using the contact form on the right.**

**Legal Assistant:** Cherie Zalstein



Mr. Enoch has practiced complex commercial litigation since his admission to the Texas Bar in May of 1979 and since 1988 has been Board Certified in the field of Civil Trial Law by the Texas Board of Legal Specialization. He attended Southern Methodist University and graduated with his Master's Degree in Business Administration and Law Degree in December of 1978. In law school, he was the moot court chief justice, winner of the Russell Baker Moot Court Competition and the ABA Regional Moot Court Competition, was a finalist in the ABA National Moot Court Competition, and was elected a member of the National Order of Barristers. He has been admitted as a member of the College of the State Bar of Texas. Mr. Enoch has also been admitted to practice before the United States Court of Appeals, Fifth Circuit, Northern, Eastern and Southern districts of Texas, and Western District of Oklahoma. He is listed in Marquis' Who's Who in American Law. He is co-author of "Practice Notes: Persuasive Arguments that the Texas Comparative Responsibility Statue Does not require a 100% Allocation of Responsibility," Texas Torts and Remedies, September 1991 Supp. and co-author of "It Isn't Personal, It's Just Business - Business vs. Business; Owners vs. Owners;" speaker, State Bar of Texas, 1995, Advanced Civil Trial Seminar; speaker, State Bar of Texas, 2005, "Focused Discovery; Questions with a purpose."

Mr. Enoch was born in Wichita, Kansas, on December 27, 1953. He attended high school in Wichita and moved to Dallas to attend Southern Methodist University in 1971. He and his wife and three children have also been active in his church and community. He has served on the Board of Trustees and Administrative Board of First United Methodist Church in Rowlett, Texas. He has also served on the Park Board and City Council of Rowlett, as well as Mayor of Rowlett. He is Immediate Past Chairman of the Board of Directors of Dallas Area Rapid Transit (DART) and continues his service on the Board representing the cities of Rowlett, Garland and Farmers Branch.

### Practice Groups

### Concentration

### Education:

Southern Methodist University (1975)

Southern Methodist University (1978)

### Affiliations:

National Order of the Barristers

State Bar of Texas

Texas Association of Defense Counsel and Defense Research Institute

Who's Who in American Law

### CONTACT MARK C. ENOCH

Name\*

Email\*

Message

Select Areas of Concentration (ctrl-click to select multiple Areas)

For security purposes, please enter the solution to the basic math problem below.

3 + 1

### GPM NEWSLETTER

### GPM NEWS

EXHIBIT

B

Advanced Civil Trial Seminar  
Dallas Area Rapid Transit (DART) as Immediate Past Chair  
Rowlett Mayor, City Council and Park Board

**Representative Engagements:**

Mr. Enoch has had great success in his cases:

The noted publication of Texas Lawyer has recognized one of his victories as one of the "Ten Biggest" of that year and wrote of another subsequent win, when the Plaintiff had sought \$50,000,000 for a tragic head injury and the jury found that Mr. Enoch's client (a helmet manufacturer) was not at fault. On the Plaintiff's side of the docket, he has helped his clients obtain, by judgment or settlement, multi-million dollar amounts for cases involving wrongful termination of employment to business torts involving investments in large businesses.

Having handled cases in Pennsylvania, Illinois, California, Texas, Colorado, New Mexico, Oklahoma, Louisiana and Nevada, Mr. Enoch has experience in handling complex business litigation relating to Contracts, Oil & Gas, Securities, Refining, Derivative Shareholder claims (from both sides), Real Estate Development, Bad Faith Insurance practices, Products Liability involving wrongful death, brain injuries, extensive burns and quadriplegia (and involving products from protective headgear and dietary supplements to explosive gasses), Banking, Federal Trade Commission regulations and business interruption, Wrongful Termination of Employment (from both sides). Claims against non-subscribers to Workers' Compensation, Commercial Construction and Manufacturing.



Martindale-Hubbell Rating

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**MELINDA H. SIMS**  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Suite 500  
Dallas, Texas 75254  
Tel: 972-419-7174  
Fax: 972-419-8329  
msims@gpm-law.com

## **EDUCATION**

**WILLIAM & MARY SCHOOL OF LAW**  
*Juris Doctor, 1998.*

Williamsburg, VA

**PRINCETON UNIVERSITY**  
*Bachelor of Arts, Woodrow Wilson School of Public and International Affairs, 1995.*

Princeton, NJ

## **PRACTICE CONCENTRATION AND EXPERIENCE SUMMARY**

Melinda H. Sims is a member of Glast, Phillips & Murray, P.C. Ms. Sims has been an attorney since 1998, during which time she has practiced law at major international law firms and the Office of the Attorney General of Texas. During law school, Ms. Sims interned for the Honorable Glen E. Conrad, U.S. Magistrate Judge of the Western District of Virginia.

Ms. Sims focuses her practice on trust and estate litigation and administration, guardianships, and general civil trials and appeals.

Ms. Sims represents individuals, financial institutions, nonprofit organizations, and other entities in all facets of trust and estate administration and litigation, including independent and dependent probate proceedings, trust and estate settlement, interpretation and modification of wills and trusts, will contests, guardianships, change of estate representatives and trustees, accountings, creditor and estate claims, contested disposition of insurance and other non-probate assets, and similar proceedings. Ms. Sims regularly serves as a court-appointed attorney ad litem in guardianship and estate proceedings.

Ms. Sims' experience includes a wide variety of matters at the trial and/or appellate levels, including with respect to taxes, contracts, investments, business interests, insurance, real property, personal injury, wrongful death, survivorship claims, oil and gas, eminent domain, and employment law. Her clients have included the State of Texas, public entities and officials, individuals, financial institutions, financial advisors, corporations, charitable institutions, trustees, executors, beneficiaries, guardians, and proposed wards.

## **PROFESSIONAL ACTIVITIES AND HONORS**

- Texas Rising Star, *Texas Monthly* 2009
- State Bar of Texas, 1998 – Present (Real Estate, Probate & Trust Section; Litigation Section)
- Dallas Bar Association (Probate, Trusts & Estates Section)
- Member, Phi Delta Phi International Legal Fraternity
- Admitted in the United States Court for the Northern District of Texas
- Editor-in-Chief, *William & Mary Bill of Rights Journal*, 1997-98; Articles Editor, 1996-97
- Merit Scholarship, William & Mary School of Law; Awarded Legal Skills Program Honors for Excellence in Legal Research and Writing; CALI Award in General Mediation; Co-Chair of Law School Admissions Committee; Faculty Hiring Committee; College Executive Council on Elections

**EXHIBIT**

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## COMMUNITY SERVICE

- Vice President, The Princeton Alumni Association of Dallas-Fort Worth, 2009-Present
- Member, Junior League of Dallas
- Member, Dallas Metropolitan Ballet Guild
- Member & Volunteer, Highland Park United Methodist Church

## PUBLICATIONS AND PRESENTATIONS

- Eric G. Reis & Melinda H. Sims, *Transfer of Proceedings in Statutory Probate Courts*, THE ADVOCATE, State Bar Litigation Section Report, Winter 2007
- Speaker, *Contested Guardianships*, Collin County Bar Association Probate Section, January 8, 2010
- Author, *Pursuing Claims Involving Estates: A Top Ten List*, HEADNOTES, Dallas Bar Association, January 2011