

**Documents to be Produced by Vacek & Freed, PLLC and Candace L. Kunz-Freed**

**For purposes of this document request, the following definitions apply:**

"6/15/10 QBD" means the Qualified Beneficiary Designation and Exercise of Testamentary Powers of Appointment Under Living Trust Agreement signed by Nelva as founder, beneficiary, and trustee on June 15, 2010.

"8/25/10 QBD" means the Qualified Beneficiary Designation and Exercise of Testamentary Powers of Appointment Under Living Trust Agreement signed by Nelva as founder, beneficiary, and trustee on August 25, 2010.

"10/25/10 Conference Call" means the conference call arranged for and conducted by Candace Freed on or about October 25, 2010 which concerned Brunsting Issues, but in which neither Nelva nor Carl participated.

"Amy" means Amy Ruth Brunsting and "Amy's Trust" means the trust created by Nelva's death on November 11, 2011 pursuant to the 8/25/10 QBD.

"Anita" means Anita Kay Brunsting and "Anita's Trust" means the trust created by Nelva's death on November 11, 2011 pursuant to the 8/25/10 QBD.

"Brunsting Descendants" means Candace, Carole, Carl, Amy, Anita, and the children and grandchildren, if any, of Candace, Carole, Carl, Amy, and Anita.

"Brunsting Issues" means issues relating to Elmer, Nelva, or the Brunsting Descendants. This definition is intended to include estate planning issues concerning Elmer and Nelva, including any trusts Elmer and Nelva established, but is not limited to such issues. Any issue involving any member of the Brunsting family falls within this definition.

"Candace" means Candace Louise Curtis and "Candace's Trust" means the trust created by Nelva's death on November 11, 2011 pursuant to the 8/25/10 QBD.

"Carl" means Carl Henry Brunsting and "Carl's Trust" means the trust created by Nelva's death on November 11, 2011 pursuant to the 8/25/10 QBD.

"Carole" means Carole Ann Brunsting and "Carole's Trust" means the trust created by Nelva's death on November 11, 2011 pursuant to the 8/25/10 QBD.

"Decedent's Trust" means the Elmer H. Brunsting Decedent's Trust created on Elmer's death on April 1, 2009 pursuant to Article VII(B)(2) of the Family Trust.

"Elmer" means Elmer H. Brunsting.

"Family Trust" means the Brunsting Family Living Trust signed by Elmer and Nelva as both founders and trustees on October 10, 1996 and restated on January 12, 2005, including any amendments made to that trust.

**EXHIBIT A**

CONFIRMED FILE DATE: 3/9/2012

“LIT” means the life insurance trust known as the Brunsting Family Irrevocable Trust signed by Elmer and Nelva as founders and Anita as trustee on February 12, 1997.

“Nelva” means Nelva E. Brunsting.

“Survivor’s Share One” means the portion of the Survivor’s Trust defined by Article VIII(A)(1) of the Family Trust.

“Survivor’s Share Two” means the portion of the Survivor’s Trust defined in Article VIII(A)(2) of the Family Trust.

“Survivor’s Trust” means the Survivor’s Trust created on Elmer’s death on April 1, 2009 pursuant to Article VII(B)(1) of the Family Trust.

**Documents requested:**

1. All calendars reflecting appointments or phone conversations with Elmer, Nelva, or any of the Brunsting Descendants.
2. All calendars reflecting meetings or telephone conferences with any accountant, appraiser, physician, expert providing opinions of any kind, or any other third parties concerning Brunsting Issues.
3. All estate planning documents prepared for Elmer, Nelva, or any of the Brunsting Descendants, including drafts which were never signed. This request is intended to specifically include Wills, if any, signed by Nelva after January 12, 2005.
4. All powers of attorney for any purpose prepared for either Elmer or Nelva, including drafts which were never signed, as well as any revocations of such powers of attorney.
5. All memoranda, notes, or other documents memorializing tasks, conversations, or meetings concerning any Brunsting Issues.
6. All correspondence or communications, including emails, to or from Elmer or Nelva or any of the Brunsting Descendants.
7. All correspondence or communications, including emails, to or from any other third parties concerning Brunsting Issues.
8. All audio or video recordings of meetings, conversations, telephone messages, or other communications with Elmer, Nelva, or any of the Brunsting Descendants concerning Brunsting Issues.
9. All audio or video recordings of Nelva’s execution of any documents.
10. All audio or video recordings of evaluations of Nelva’s capacity.
11. All other audio or video recordings of any Brunsting family member.

12. All transcriptions of the recordings described in numbers 8, 9, 10, and 11 above.
13. All investigations made of any Brunsting family member, including any surveillance logs or reports.
14. All documents reflecting requests made since April 1, 2009 for evaluations of Nelva's capacity.
15. All reports done or evaluations made since April 1, 2009 of Nelva's capacity.
16. All documents reflecting the reason for and arrangements made concerning the 10/25/10 Conference Call.
17. All memos or notes concerning the 10/25/10 Conference Call.
18. All documents reflecting notification to Carl, Carl's wife, or Carl's daughter of the 10/25/10 Conference Call.
19. All documents reflecting notification to Nelva of the 10/25/10 Conference Call.
20. All audio recordings of the 10/25/10 Conference Call.
21. All transcriptions of the recording described in number 20 above.
22. All documents reflecting any transfers of property owned by Elmer, Nelva, the Family Trust, the Survivor's Trust, or the Decedent's Trust.
23. All documents reflecting actions taken and transfers made through the use of any power of attorney given by either Elmer and/or Nelva.
24. All documents reflecting any notices, disclosures, or explanations provided to any of the Brunsting Descendants about Brunsting Issues.
25. All documents reflecting explanations provided to Nelva concerning Brunsting Issues.
26. All documents reflecting requests for changes in Elmer or Nelva's estate planning.
27. All documents reflecting opposition to proposed changes in Nelva's estate planning.
28. All accountings, whether in draft or final form, for any trusts resulting from Elmer or Nelva's estate planning.
29. All documents reflecting funding of or transfers to any trusts resulting from Elmer or Nelva's estate planning.
30. All documents reflecting the value, description, characterization, and disposition of assets for any property owned by Elmer or Nelva before creation of the Family Trust.

31. All documents reflecting the value, description, characterization, and disposition of assets in the Family Trust at the time of Elmer's death.
32. All documents reflecting the value, description, characterization, and disposition of assets in the Family Trust, the Survivor's Trust and the Decedent's Trust at the time of Nelva's death.
33. All documents reflecting Elmer or Nelva's desire to treat any of their children differently or unequally in their estate planning.
34. All documents reflecting Elmer or Nelva's desire to treat any of their grandchildren differently or unequally in their estate planning.
35. All documents reflecting the current description and value of every asset in every trust resulting from Elmer and Nelva's estate planning.
36. All documents reflecting the involvement of any of the Brunsting Descendants in Elmer and Nelva's estate planning.
37. All documents reflecting knowledge of any of the Brunsting Descendants concerning Elmer and Nelva's estate planning.
38. All complaints made or statements given to any agency, including, but not limited to, CPS or APS, about any Brunsting family member.
39. All reports from any agency relating to the complaints or statements described in number 38 above.
40. All communications, including emails, between Brunsting family members.
41. All gift tax returns filed by Elmer and/or Nelva since the formation of the Family Trust.
42. All income tax returns filed by Elmer and/or Nelva since the formation of the Family Trust.
43. All estate tax returns, or unfiled drafts of estate tax returns, for Elmer or Nelva.
44. All work papers for the returns described in numbers 41, 42, and 43 above.
45. All documents reflecting the parties involved in the administration of any of the trusts created by Elmer and Nelva.
46. All documents reflecting control exercised over the assets of Elmer, Nelva, and the trusts they created.
47. All lists or other documents maintained by Elmer and/or Nelva prior to their deaths reflecting funds or other assets provided to any of the Brunsting Descendants.

48. All documents reflecting the manner in which the transfers described in number 47 above were to be characterized and/or treated, as well as any return or repayments of those amounts.
49. All documents reflecting actions taken to confirm Nelva's capacity to make estate planning decisions or execute documents.
50. All documents reflecting the steps taken to deliver documents relating to legal, financial, or asset issues to Nelva.
51. All documents concerning Brunsting Issues sent to anyone other than Nelva.
52. All documents tending to establish that Nelva was not being unduly influenced in her decisions after Elmer's death.
53. All documents reflecting any efforts made to confirm that Nelva's wishes with regard to her estate planning were the ones being implemented.
54. All fee agreements you have or had with Elmer, Nelva, any Brunsting Descendant, or any trust created by any such parties, including all documents addressing any joint representation issues.
55. All documents relating to the preparation of and purpose for the net worth statement for Elmer and Nelva dated February 17, 2005 showing a net worth of \$2,244,893.26, including documents supporting the information contained in the statement.
56. All documents relating to the ownership and transfer or other disposition of the 3522.42 shares of Exxon Mobil stock listed on the February 17, 2005 net worth statement for Elmer and Nelva Brunsting, including, but not limited to, stock certificates and stock powers, summaries of account holdings and account transactions from Exxon Mobile or its transfer agent.
57. All documents provided to Elmer, Nelva, or any of the Brunsting Descendants explaining any fiduciary obligations resulting from Elmer and Nelva's estate planning or any power of attorney Elmer or Nelva may have signed.
58. All documents reflecting compliance with fiduciary obligations arising from Elmer and Nelva's estate planning or any power of attorney Elmer or Nelva may have signed.
59. All documents reflecting investigations made to determine what assets, if any, were owned by Elmer and/or Nelva's probate estate or whether either of their wills should be probated.
60. All documents reflecting actions taken to remove assets from Elmer's probate estate or to recharacterize assets as Family Trust assets after his death.
61. All documents reflecting actions taken to remove assets from Nelva's probate estate or to recharacterize assets as Family Trust assets after her death.
62. All expert opinions or reports of any kind prepared in connection with Brunsting Issues.

63. All billings from third parties paid by your firm concerning Brunsting Issues.
64. All documents reflecting any steps taken to investigate or implement possible guardianship proceedings against any Brunsting family member.
65. All bank statements, brokerage statements, or other financial institution statements for accounts in the name of Elmer or Nelva since formation of the Family Trust.
66. All signature cards, whether original or amended, for bank accounts described in number 65 above.
67. All documents relating to calculation, and support for the calculation of any trustee compensation paid from any trust established by Elmer or Nelva.
68. All statements taken from witnesses concerning Brunsting Issues.
69. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Elmer or Nelva.
70. All support documents for the items described in number 69 above.
71. All requests from any trustee of the Family Trust to receive and review any information regarding Nelva's physical or mental health and all consents to release and disclosure of such information.
72. All "Authorizations for Release of Protected Health Information" signed by Nelva or any trustee of the Family Trust.
73. Any disclaimers signed by Nelva or any Brunsting Descendant.
74. All records involving access to safety deposit boxes rented by Elmer and Nelva.
75. All inventories of property kept in or removed from the safety deposit boxes described in number 74 above.
76. The list circulated by Nelva to Brunsting Descendants after Elmer's death concerning personal property to be selected by the Descendants.
77. All documents reflecting the disposition of all personal property owned by Elmer Nelva, or the Family Trust.
78. All records reflecting storage units rented by or containing property owned by Elmer, Nelva, or the Family Trust.
79. All inventories of property located in or removed from the storage units described in number 78 above.

80. All time records and other documentation concerning the identity, as well as the dates and time worked, of all caregivers helping Nelva since January 1, 2010.
81. All documents relating to any IRA, 401K, or other retirements or pension accounts owned by Elmer, Nelva, or the Family Trust, including, but not limited to, statements and beneficiary designation forms.
82. All information concerning savings bonds purchased and/or owned by Elmer, Nelva, or the Family Trust, including, but not limited to, documents reflecting the purchase and the liquidation of such bonds.
83. All communications, including emails, with Carl concerning Nelva's estate.
84. All appraisals of personal or real property owned by Elmer or the Family Trust at Elmer's death.
85. All appraisals of personal or real property owned by Nelva or the Family Trust at Nelva's death.
86. The trust notebook maintained by Elmer and Nelva.
87. All letters of instruction from either Elmer or Nelva since formation of the Family Trust.
88. All photographs of property owned by Elmer, Nelva, or the Family Trust since formation of the Family Trust.
89. All documents removed by Anita or Amy from Nelva's home or safe deposit box since Elmer's death.

**Unless otherwise included above, with regard to the Family Trust produce the following:**

1. All documents transferring assets to the Family Trust.
2. All documents reflecting assets purchased by the Family Trust.
3. All documents reflecting transfers of assets at any time from the Family Trust.
4. All invoices, statements, or other support documents for expenses incurred by the Family Trust since April 1, 2009.
5. All documents reflecting disbursements from the Family Trust since April 1, 2009.
6. All documents reflecting funds received by the Family Trust since April 1, 2009.
7. All documents providing support for the right of the Family Trust to receive funds since April 1, 2009.

8. All documents establishing relationships of any type resulting in obligations owed by the Family Trust since April 1, 2009.
9. All documents establishing accounts of any type in the name of the Family Trust.
10. All bank account statements in the name of the Family Trust or into which funds of the Family Trust was deposited since April 1, 2009.
11. All signature cards and beneficiary designation forms, whether original or amended, for bank accounts described in number 10 above.
12. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 10 above.
13. All deposits or other documents reflecting credits to accounts described in number 10 above.
14. All brokerage account statements in the name of the Family Trust or which held stock, mutual funds, cash, or any other assets of the Family Trust since April 1, 2009.
15. All signature cards or authorization forms and beneficiary designation forms, whether original or amended, for the accounts described in number 14 above.
16. All documents reflecting deposits or credits into accounts described in number 14 above.
17. All documents reflecting withdrawals from or debits to the accounts described in number 14 above.
18. All documents reflecting stock transactions in the accounts described in number 14 above.
19. All income tax returns for the Family Trust.
20. All income tax returns for Elmer and/or Nelva which reported income or expenses of the Family Trust.
21. All tax work papers for the tax returns described in numbers 19 and 20 above.
22. All appraisals of real or personal property owned at any time by the Family Trust.
23. All inventories, accountings, or other documents listing real or personal property owned by the Family Trust.
24. All support documents for the items described in number 23 above.
25. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to the Family Trust.
26. All support documents for the items described in number 25 above.



27. All documents reflecting analysis or calculation of changes to Family Trust's assets as a result of Elmer's death.
28. All documents reflecting analysis or calculation of changes to Family Trust's assets as a result of Nelva's death.
29. All documents reflecting analysis or calculation concerning amounts transferred from the Family Trust to other trusts.
30. All correspondence or other communications, including emails, relating to the Family Trust.
31. The original Family Trust instrument.
32. All restatements of the Family Trust.
33. All amendments to the Family Trust.
34. All drafts of amendments to the Family Trust which were prepared but never signed.
35. All appointments of trustees for the Family Trust.
36. All resignations of trustees of the Family Trust.
37. All acceptances by trustees of the Family Trust.
38. All disclosures, notices, or accountings of the Family Trust provided to any of the Brunsting Descendants.
39. All consents, receipts, or acknowledgments concerning the Family Trust signed by any of the Brunsting Descendants.
40. All Affidavits of Authority to Act signed by any trustee of the Family Trust.
41. All affidavits of succession signed by any successor trustee of the Family Trust.
42. All affidavits described in numbers 40 and 41 above which were recorded in the real property records of any county.
43. All fee agreements relating to the preparation of and any other work done with regard to the Family Trust.
44. All time records for legal services, special co-trustee work, or trust protector work provided in connection with the Family Trust.
45. All invoices for attorney's fees, special co-trustee work, trust protector work, or expenses billed in connection with the Family Trust.
46. All documents prepared by any accountant relating to the Family Trust.

47. All expert reports relating to the Family Trust.
48. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to the Family Trust.
49. All invoices from investigators concerning work done for or about the Family Trust.
50. All investigator's reports concerning work done for or about the Family Trust.
51. All inventories, accountings, evaluations, or calculations done in connection with the formation of the Family Trust.
52. All inventories, accountings, evaluations, calculations, or other documents listing Family Trust assets done in connection with Elmer's death.
53. All inventories, accountings, evaluations, calculations, or other documents listing Family Trust assets done in connection with Nelva's death.
54. All inventories, accountings, evaluations, or calculations done in connection with any other events resulting in changes in the Family Trust's structure.
55. All support documents for the items described in numbers 51, 52, 53, and 54 above.
56. All documents evidencing or describing any trustee compensation, trust protector compensation, or reimbursement paid by the Family Trust.
57. All documents providing support for any trustee compensation or reimbursement paid by the Family Trust, including time records for time spent in the administration of the Family Trust and proof of expenses incurred.
58. All requests for distributions from the Family Trust.
59. All analysis of and responses to requests for distributions from the Family Trust.
60. All written financial reports to beneficiaries required by XII (Section E) of the Family Trust.
61. All waivers by beneficiaries of the requirements of the reports described in number 60 above.
62. All written notices to beneficiaries of the merger of any trusts as discussed in XII (Section L) of the Family Trust.
63. All Memoranda of Distribution or other instructions signed by Elmer or Nelva pursuant to the terms of XXIV (Section A) of the Family Trust.
64. All appointments, designations, acceptances, or removals of trust protectors for the Family Trust.
65. All documents reflecting and supporting compensation paid to any trust protectors.

66. All documents reflecting actions taken by any trust protectors and any advance notice of those actions which were provided to the Brunsting Descendants.
67. All documents setting forth the qualifications of all trust protectors.
68. All documents creating liens against property owned by the Family Trust.
69. All documents reflecting the agreement of the trustees of the Family Trust to take action.
70. All letters of instruction from Elmer or Nelva since formation of the Family Trust.
71. All withdrawals from the Family Trust exercised by either Elmer or Nelva.
72. All other books and records of the Family Trust.

**Unless otherwise included above, with regard to the LIT produce the following:**

1. All documents transferring assets to the LIT.
2. All documents reflecting assets owned by the LIT.
3. All documents reflecting transfers of assets from the LIT.
4. All invoices, statements, or other support documents for expenses incurred by the LIT.
5. All documents reflecting disbursements for expenses from the LIT.
6. All documents reflecting funds received by the LIT.
7. All documents establishing the right of the LIT to receive insurance proceeds or otherwise providing support for any insurance proceeds received by the LIT.
8. All documents establishing accounts of any type in the name of the LIT since April 1, 2009.
9. All bank account statements in the name of the LIT or into which funds of the LIT were deposited since April 1, 2009.
10. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 9 above.
11. All deposits or other documents reflecting credits to accounts described in number 9 above.
12. All income tax returns for the LIT.
13. All gift tax returns filed by Elmer and/or Nelva because of the existence of the LIT.
14. All tax work papers for the tax returns described in numbers 12 and 13 above.

15. All correspondence or other communications, including emails, relating to the LIT.
16. The original LIT instrument.
17. All disclosures, notices, or accountings provided to any of the Brunsting Descendants of the LIT.
18. All consents, receipts, or acknowledgments signed by any of the Brunsting Descendants of the LIT.
19. All fee agreements relating to preparation of and any other work done with regard to the LIT.
20. All time records for legal services provided in connection with the LIT.
21. All invoices for attorney's fees and expenses billed in connection with the LIT.
22. All documents prepared by any accountant relating to the LIT.
23. All invoices from accountants relating to the LIT.
24. All documents evidencing any trustee compensation paid by the LIT.
25. All documents supporting any trustee compensation paid by the LIT.
26. All other books and records of the LIT.

**Unless otherwise included above, with regard to the 6/15/10 QBD produce the following:**

1. All documents requesting or relating to preparation of the 6/15/10 QBD.
2. All writings signed by Nelva as described in I.A. of the 6/15/10 QBD.
3. All documents evidencing the advance of funds resulting in the writings described in number 2 above.
4. All correspondence relating to the 6/15/10 QBD or any advances the 6/15/10 QBD addresses.
5. All drafts of amendments to the 6/15/10 QBD which were never signed.
6. All notices to any beneficiaries of the Family Trust that the 6/15/10 QBD had been signed.
7. All notices to any beneficiaries of advances established by the terms of the 6/15/10 QBD.
8. All records reflecting gifts, loans, or other transfers of funds resulting in advances.
9. All actions taken to determine Nelva's capacity on 6/15/10.

10. All actions taken to determine whether Nelva was unduly influenced in connection with the 6/15/10 QBD.
11. All documents describing the events which triggered the 6/15/10 QBD.

**Unless otherwise included above, with regard to the 8/25/10 QBD produce the following:**

1. All documents reflecting transfers of assets from the Family Trust based upon the terms of the 8/25/10 QBD.
2. All documents reflecting assets transferred to any trust established by the terms of the 8/25/10 QBD.
3. All supporting calculations for the transfers described in numbers 1 and 2 above.
4. All invoices, statements, or other support documents for expenses incurred by any trust established by the terms of the 8/25/10 QBD.
5. All documents reflecting disbursements made by the Family Trust based upon the terms of the 8/25/10 QBD.
6. All documents reflecting funds received by any other entity based upon the terms of the 8/25/10 QBD.
7. All signature cards, whether original or amended, for any bank account for any trust established by the terms of the 8/25/10 QBD.
8. All bank statements for the accounts described in number 7 above.
9. All cancelled checks, debits, or other documents reflecting withdrawals from any bank accounts described in number 7 above.
10. All deposits or other documents reflecting credits to any bank accounts described in number 7 above.
11. All brokerage account statements for any trust established because of the terms of the 8/25/10 QBD.
12. All signature cards or authorization forms, whether original or amended, for the accounts described in number 11 above.
13. All documents reflecting deposits or transfers into accounts described in number 11 above.
14. All documents reflecting stock transactions in the accounts described in number 11 above.
15. All accounting work done relating to the execution of the 8/25/10 QBD.

16. All accounting work done relating to the 8/25/10 QBD as a result of Nelva's death.
17. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of the 8/25/10 QBD.
18. All inventories, accountings, evaluations, or other asset listings done in connection with the 8/25/10 QBD as a result of Nelva's death.
19. All balance sheets, profit and loss statements, general ledgers, or other financial summaries prepared based upon the terms of the 8/25/10 QBD.
20. All support documents for the items described in numbers 17, 18, and 19 above.
21. All documents reflecting analysis or calculation of changes based upon the terms of the 8/25/10 QBD assets as a result of Nelva's death.
22. All correspondence or other communications, including emails, relating to the 8/25/10 QBD.
23. The original 8/25/10 QBD instrument.
24. All restatements of the 8/25/10 QBD.
25. All drafts of the 8/25/10 QBD or any amendments thereto which were prepared but never signed.
26. All appointments of trustees for the 8/25/10 QBD.
27. All resignations of trustee for the 8/25/10 QBD.
28. All acceptances by trustees for the 8/25/10 QBD.
29. All notices, disclosures, or accountings provided to any of the Brunsting Descendants concerning the 8/25/10 QBD.
30. All consents, receipts, or acknowledgments signed by any of the Brunsting Descendants concerning the 8/25/10 QBD.
31. All Affidavits of Authority to Act signed by any trustee of the 8/25/10 QBD.
32. All affidavits of succession signed by any successor trustee of the 8/25/10 QBD.
33. All affidavits described in numbers 31 and 32 above which were recorded in the real property records of any county.
34. All fee agreements relating to the preparation of and any other work done with regard to the 8/25/10 QBD.

35. All time records for legal services, trustee services, special co-trustee services, or trust protector services provided in connection with the 8/25/10 QBD.
36. All invoices for attorney's fees, trustee fees, special co-trustee fees, trust protector fees, and expenses billed in connection with the 8/25/10 QBD.
37. All documents prepared by any accountant relating to the 8/25/10 QBD.
38. All expert reports relating to the 8/25/10 QBD.
39. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to the 8/25/10 QBD.
40. All invoices from investigators concerning work done for or about the 8/25/10 QBD.
41. All investigator's reports concerning work done for or about the 8/25/10 QBD.
42. All documents evidencing or describing any trustee compensation or reimbursement paid by any trusts formed according to the terms of the 8/25/10 QBD.
43. All documents supporting any the payments described in number 42 above.
44. All requests for distributions from trusts created by the terms of the 8/25/10 QBD.
45. All analysis of and responses to requests for distributions from the 8/25/10 QBD.
46. All appointments, designations, acceptances, or resignations of special co-trustees for any trusts created according to the terms of the 8/25/10 QBD.
47. All documents reflecting and supporting compensation or reimbursement to any special co-trustees.
48. All documents reflecting actions taken by any special co-trustees.
49. All appointments, designations, acceptances, or resignations of trust protectors for any trusts created according to the terms of the 8/25/10 QBD.
50. All documents reflecting and supporting compensation or reimbursement to any trust protectors.
51. All documents reflecting actions taken by any trust protectors for any trust created according to the terms of the 8/25/10 QBD.
52. All notices, including, but not limited to, those required by paragraph C.1 on page 17 of the QBD provided to the Brunsting Descendants of any actions taken by any special co-trustee or any trust protector of any trusts created according to the terms of the 8/25/10 QBD.

53. All documents reflecting the qualifications of any special co-trustee or trust protector for any trust created according to the terms of the 8/25/10 QBD.
54. All documents creating liens against any property owned by any trust created by the 8/25/10 QBD.
55. All actions taken to determine Nelva's capacity on 8/25/10.
56. All actions taken to determine whether Nelva was unduly influenced in connection with the 8/25/10 QBD.
57. All letters of instruction from Nelva as contemplated by paragraph c on page 9 of the 8/25/10 QBD.
58. All withdrawals from trust property exercised by Nelva.
59. All documents describing the events which triggered the 8/25/10 QBD.
60. All other books and records relating to the 8/25/10 QBD.

**Unless otherwise included above, with regard the Survivor's Trust produce the following:**

1. All documents reflecting a transfer of assets to the Survivor's Trust.
2. All documents reflecting assets owned at any time by the Survivor's Trust.
3. All documents reflecting a transfer of assets at any time from the Survivor's Trust.
4. All invoices, statements, or other support documents for expenses incurred by the Survivor's Trust.
5. All documents reflecting disbursements from the Survivor's Trust.
6. All documents reflecting funds received by the Survivor's Trust.
7. All bank account statements in the name of the Survivor's Trust or into which funds of the Survivor's Trust were deposited.
8. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 7 above.
9. All deposits or other documents reflecting credits to accounts described in number 7 above.
10. All brokerage account statements in the name of the Survivor's Trust or which held assets of the Survivor's Trust.
11. All documents reflecting deposits or credits into accounts described in number 10 above.



12. All documents reflecting debits to the accounts described in number 10 above.
13. All documents reflecting stock transactions in the accounts described in number 10 above.
14. All income tax returns for the Survivor's Trust.
15. All income tax returns for Nelva which reported income or expenses of the Survivor's Trust.
16. All tax work papers for the tax returns described in numbers 14 and 15 above.
17. All appraisals of real or personal property owned by the Survivor's Trust.
18. All inventories, accountings, or other documents listing real or personal property owned by the Survivor's Trust.
19. All support documents for the items described in number 18 above.
20. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to the Survivor's Trust.
21. All support documents for the items described in number 20 above.
22. All correspondence or other communications, including emails, relating to the Survivor's Trust.
23. All notices, disclosures, or accountings provided to any of the Brunsting Descendants concerning the Survivor's Trust.
24. All other books and records of the Survivor's Trust.

**Unless otherwise included above, with regard to the Survivor's Share One and Survivor's Share Two produce the following:**

1. All inventories, characterizations, accountings, or other documents listing property owned by the Survivor's Share One.
2. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to the Survivor's Share One.
3. All support documents for the items described in numbers 1 and 2 above.
4. All inventories, characterizations, accountings, or other documents listing used to determine no property would be placed in Survivor's Share Two.
5. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to the Survivor's Share Two.

6. All support documents for the items described in number 4 and 5 above.
7. All inventories, accountings, evaluations, or other documents listings done in connection with the formation of the Survivor's Share One.
8. All inventories, accountings, evaluations, or other documents listings done in connection with the formation of the Survivor's Share Two.
9. All support documents for the items described in numbers 7 and 8 above.
10. All correspondence or other communications, including emails, relating to the Survivor's Share One.
11. All correspondence or other communications, including emails, relating to the Survivor's Share Two.
12. All disclosures, notices, or accountings provided to any of the Brunsting Descendants relating to Survivor's Share One.
13. All disclosures, notices, or accountings provided to any of the Brunsting Descendants relating to Survivor's Share Two.
14. All other books and records of the Survivor's Share One.
15. All other books and records of the Survivor's Share Two.

**Unless otherwise included above, with regard to the Decedent's Trust produce the following:**

1. All documents reflecting a transfer of assets to the Decedent's Trust.
2. All documents reflecting assets owned at any time by the Decedent's Trust.
3. All documents reflecting a transfer of assets at any time from the Decedent's Trust.
4. All invoices, statements, or other support documents for expenses incurred by the Decedent's Trust.
5. All documents reflecting disbursements from the Decedent's Trust.
6. All documents reflecting funds received by the Decedent's Trust.
7. All bank account statements in the name of the Decedent's Trust or into which funds of the Decedent's Trust were deposited.
8. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 7 above.

9. All deposits or other documents reflecting credits to accounts described in number 7 above.
10. All brokerage account statements in the name of the Decedent's Trust or which held assets of the Decedent's Trust.
11. All documents reflecting deposits or credits into accounts described in number 10 above.
12. All documents reflecting debits to the accounts described in number 10 above.
13. All documents reflecting stock transactions in the accounts described in number 10 above.
14. All income tax returns for the Decedent's Trust.
15. All income tax returns for Nelva which reported income or expenses of the Decedent's Trust.
16. All tax work papers for the tax returns described in numbers 14 and 15 above.
17. All appraisals of real or personal property owned by the Decedent's Trust.
18. All inventories, accountings, or other documents listing property owned by the Decedent's Trust.
19. All support documents for the items described in number 18 above.
20. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to the Decedent's Trust.
21. All support documents for the items described in number 20 above.
22. All correspondence or other communications, including emails, relating to the Decedent's Trust.
23. All disclosures, notices, or accountings provided to any of the Brunsting Descendants concerning the Decedent's Trust.

**Unless otherwise included above, with regard to Candace's Trust produce the following:**

1. All documents reflecting a transfer of assets to Candace's Trust.
2. All documents reflecting assets owned at any time by Candace's Trust.
3. All documents reflecting a transfer of assets from Candace's Trust.
4. All invoices, statements, or other support documents for expenses incurred by Candace's Trust.
5. All documents reflecting disbursements from Candace's Trust.

6. All documents reflecting funds received by Candace's Trust.
7. All signature cards or other authorization documents, whether original or amended, and any other documents establishing accounts of any type for Candace's Trust.
8. All bank account statements in the name of Candace's Trust or into which funds of Candace's Trust were deposited.
9. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 8 above.
10. All deposits or other documents reflecting credits to accounts described in number 8 above.
11. All brokerage account statements in the name of Candace's Trust or into which assets of Candace's Trust were deposited.
12. All documents reflecting deposits or credits into accounts described in number 11 above.
13. All documents reflecting debits to the accounts described in number 11 above.
14. All documents reflecting stock transactions in the accounts described in number 11 above.
15. All appraisals of real or personal property owned by Candace's Trust.
16. All inventories, accountings, or other documents listing property owned by Candace's Trust.
17. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Candace's Trust.
18. All documents reflecting analysis or calculation of changes to Candace's Trust's assets as a result of Nelva's death.
19. All support documents for the items described in numbers 16, 17, and 18 above.
20. All correspondence or other communications, including emails, relating to Candace's Trust.
21. All notices, disclosures, or accounting provided to the beneficiary of Candace's Trust.
22. All requests for distributions from Candace's Trust.
23. All analysis of and responses to requests for distributions from Candace's Trust.
24. All documents reflecting any action taken by any trustee of Candace's Trust since Nelva's death.
25. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of Candace's Trust.

26. All documents reflecting trustee compensation or reimbursement paid by Candace's Trust.
27. All documents supporting the payments described in numbers 25 and 26 above.
28. All time records for legal services, trustee services, special co-trustee services, and trust protector services provided in connection with Candace's Trust.
29. All invoices for attorney's fees, trustee services, special co-trustee services, trust protector services, and expenses billed in connection with Candace's Trust.
30. All documents prepared by any accountant relating to Candace's Trust.
31. All expert reports relating to Candace's Trust.
32. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to Candace's Trust.
33. All invoices from investigators concerning work done for or about Candace's Trust.
34. All investigator's reports concerning work done for or about Candace's Trust.
35. All appointments, designations, acceptances, and resignations of special co-trustees for Candace's Trust.
36. All documents reflecting and supporting compensation or reimbursement to any special co-trustees.
37. All documents reflecting actions taken by any special co-trustees.
38. All appointments, designations, acceptances, and resignations of any trust protectors for Candace's Trust.
39. All documents reflecting and supporting compensation or reimbursement to any trust protectors for Candace's Trust.
40. All documents reflecting actions taken by trust protectors for Candace's Trust.
41. All documents reflecting notice of any actions taken by any special co-trustee or trust protector to Candace.
42. All documents creating liens against any property owned by Candace's Trust.
43. All documents reflecting the agreement of the trustees of Candace's Trust to take action.
44. All documents relating to any request for or scheduling of the private meeting or telephone conference with Candace contemplated by paragraph C on page 6 of the 10/25/10QBD.
45. All other books and records of Candace's Trust.

**Unless otherwise included above, with regard to Carole's Trust produce the following:**

1. All documents reflecting a transfer of assets to Carole's Trust.
2. All documents reflecting assets owned at any time by Carole's Trust.
3. All documents reflecting a transfer of assets from Carole's Trust.
4. All invoices, statements, or other support documents for expenses incurred by Carole's Trust.
5. All documents reflecting disbursements from Carole's Trust.
6. All documents reflecting funds received by Carole's Trust.
7. All signature cards or other authorization documents, whether original or amended, and other documents establishing accounts of any type for Carole's Trust.
8. All bank account statements in the name of Carole's Trust or into which funds of Carole's Trust were deposited.
9. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 8 above.
10. All deposits or other documents reflecting credits to accounts described in number 8 above.
11. All brokerage account statements in the name of Carole's Trust or into which assets of Carole's Trust were deposited.
12. All documents reflecting deposits or credits into accounts described in number 11 above.
13. All documents reflecting debits to the accounts described in number 11 above.
14. All documents reflecting stock transactions in the accounts described in number 11 above.
15. All appraisals of real or personal property owned by Carole's Trust.
16. All inventories, accountings, or other documents listing property owned by Carole's Trust.
17. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Carole's Trust.
18. All documents reflecting analysis or calculation of changes to Carole's Trust's assets as a result of Nelva's death.
19. All support documents for the items described in numbers 16, 17, and 18 above.
20. All correspondence or other communications, including emails, relating to Carole's Trust.

21. All notices, disclosures, or accounting provided to the beneficiary of Carole's Trust.
22. All requests for distributions from Carole's Trust.
23. All analysis of and responses to requests for distributions from Carole's Trust.
24. All documents reflecting any action taken by any trustee of Carole's Trust since Nelva's death.
25. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of Carole's Trust.
26. All documents reflecting trustee compensation or reimbursement paid by Carole's Trust.
27. All documents supporting the payments described in numbers 25 and 26 above.
28. All time records for legal services, trustee services, special co-trustee services, and trust protector services provided in connection with Carole's Trust.
29. All invoices for attorney's fees, trustee services, special co-trustee services, and trust protector services, and expenses billed in connection with Carole's Trust.
30. All documents prepared by any accountant relating to Carole's Trust.
31. All expert reports relating to Carole's Trust.
32. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to Carole's Trust.
33. All invoices from investigators concerning work done for or about Carole's Trust.
34. All investigator's reports concerning work done for or about Carole's Trust.
35. All appointments, designations, acceptances, and resignations of special co-trustees for Carole's Trust.
36. All documents reflecting and supporting compensation or reimbursement to any special co-trustees.
37. All documents reflecting actions taken by any special co-trustees.
38. All appointments, designations, acceptances, and resignations of any trust protectors for Carole's Trust.
39. All documents reflecting and supporting compensation or reimbursement to any trust protectors for Carole's Trust.
40. All documents reflecting actions taken by trust protectors for Carole's Trust.

41. All documents reflecting notice of any actions taken by any special co-trustee or trust protector to Carole.
42. All documents creating liens against any property owned by Carole's Trust.
43. All disclaimers signed by Carole.
44. All powers of appointment or qualified beneficiary designations signed by Carole.
45. All other books and records of Carole's Trust.

**Unless otherwise included above, with regard to Carl's Trust produce the following:**

1. All documents reflecting a transfer of assets to Carl's Trust.
2. All documents reflecting assets owned at any time by Carl's Trust.
3. All documents reflecting a transfer of assets from Carl's Trust.
4. All invoices, statements, or other support documents for expenses incurred by Carl's Trust.
5. All documents reflecting disbursements from Carl's Trust.
6. All documents reflecting funds received by Carl's Trust.
7. All signature cards or other authorization documents, whether original or amended, and other documents establishing accounts of any type for Carl's Trust.
8. All bank account statements in the name of Carl's Trust or into which funds of Carl's Trust were deposited.
9. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 8 above.
10. All deposits or other documents reflecting credits to accounts described in number 8 above.
11. All brokerage account statements in the name of Carl's Trust or into which assets of Carl's Trust were deposited.
12. All documents reflecting deposits or credits into accounts described in number 11 above.
13. All documents reflecting debits to the accounts described in number 11 above.
14. All documents reflecting stock transactions in the accounts described in number 11 above.
15. All appraisals of real or personal property owned by Carl's Trust.



16. All inventories, accountings, or other documents listing property owned by Carl's Trust.
17. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Carl's Trust.
18. All documents reflecting analysis or calculation of changes to Carl's Trust's assets as a result of Nelva's death.
19. All support documents for the items described in numbers 16, 17, and 18 above.
20. All correspondence or other communications, including emails, relating to Carl's Trust.
21. All notices, disclosures, or accounting provided to the beneficiary of Carl's Trust.
22. All requests for distributions from Carl's Trust.
23. All analysis of and responses to requests for distributions from Carl's Trust.
24. All documents reflecting any action taken by any trustee of Carl's Trust since Nelva's death.
25. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of Carl's Trust.
26. All documents reflecting trustee compensation or reimbursement paid by Carl's Trust.
27. All documents supporting the payments described in numbers 25 and 26 above.
28. All time records for legal services, trustee services, special co-trustee services, and trust protector services provided in connection with Carl's Trust.
29. All invoices for attorney's fees, trustee services, special co-trustee services, and trust protector services, and expenses billed in connection with Carl's Trust.
30. All documents prepared by any accountant relating to Carl's Trust.
31. All expert reports relating to Carl's Trust.
32. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to Carl's Trust.
33. All invoices from investigators concerning work done for or about Carl's Trust.
34. All investigator's reports concerning work done for or about Carl's Trust.
35. All appointments, designations, acceptances, and resignations of special co-trustees for Carl's Trust.

36. All documents reflecting and supporting compensation or reimbursement to any special co-trustees.
37. All documents reflecting actions taken by any special co-trustees.
38. All appointments, designations, acceptances, and resignations of any trust protectors for Carl's Trust.
39. All documents reflecting and supporting compensation or reimbursement to any trust protectors for Carl's Trust.
40. All documents reflecting actions taken by trust protectors for Carl's Trust.
41. All documents reflecting notice of any actions taken by any special co-trustee or trust protector to Carl.
42. All documents creating liens against any property owned by Carl's Trust.
43. All documents reflecting the agreement of the trustees of Carl's Trust to take action.
44. All documents relating to any request for or scheduling of the private meeting or telephone conference with Carl contemplated by paragraph C on page 6 of the 10/25/10QBD.
45. All other books and records of Carl's Trust.

**Unless otherwise included above, with regard to Amy's Trust produce the following:**

1. All documents reflecting a transfer of assets to Amy's Trust.
2. All documents reflecting assets owned at any time by Amy's Trust.
3. All documents reflecting a transfer of assets from Amy's Trust.
4. All invoices, statements, or other support documents for expenses incurred by Amy's Trust.
5. All documents reflecting disbursements from Amy's Trust.
6. All documents reflecting funds received by Amy's Trust.
7. All signature cards or other authorization documents, whether original or amended, and other documents establishing accounts of any type for Amy's Trust.
8. All bank account statements in the name of Amy's Trust or into which funds of Amy's Trust were deposited.
9. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 8 above.

10. All deposits or other documents reflecting credits to accounts described in number 8 above.
11. All brokerage account statements in the name of Amy's Trust or into which assets of Amy's Trust were deposited.
12. All documents reflecting deposits or credits into accounts described in number 11 above.
13. All documents reflecting debits to the accounts described in number 11 above.
14. All documents reflecting stock transactions in the accounts described in number 11 above.
15. All appraisals of real or personal property owned by Amy's Trust.
16. All inventories, accountings, or other documents listing property owned by Amy's Trust.
17. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Amy's Trust.
18. All documents reflecting analysis or calculation of changes to Amy's Trust's assets as a result of Nelva's death.
19. All support documents for the items described in numbers 16, 17, and 18 above.
20. All correspondence or other communications, including emails, relating to Amy's Trust.
21. All notices, disclosures, or accounting provided to the beneficiary of Amy's Trust.
22. All requests for distributions from Amy's Trust.
23. All analysis of and responses to requests for distributions from Amy's Trust.
24. All documents reflecting any action taken by any trustee of Amy's Trust since Nelva's death.
25. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of Amy's Trust.
26. All documents reflecting trustee compensation or reimbursement paid by Amy's Trust.
27. All documents supporting the payments described in numbers 25 and 26 above.
28. All time records for legal services, trustee services, special co-trustee services, and trust protector services provided in connection with Amy's Trust.
29. All invoices for attorney's fees, trustee services, special co-trustee services, and trust protector services, and expenses billed in connection with Amy's Trust.
30. All documents prepared by any accountant relating to Amy's Trust.

31. All expert reports relating to Amy's Trust.
32. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to Amy's Trust.
33. All invoices from investigators concerning work done for or about Amy's Trust.
34. All investigator's reports concerning work done for or about Amy's Trust.
35. All appointments, designations, acceptances, and resignations for Amy's Trust.
36. All documents reflecting and supporting compensation or reimbursement to any special co-trustees.
37. All documents reflecting actions taken by any special co-trustees.
38. All appointments, designations, acceptances, and resignations of any trust protectors for Amy's Trust.
39. All documents reflecting and supporting compensation or reimbursement to any trust protectors for Amy's Trust.
40. All documents reflecting actions taken by trust protectors for Amy's Trust.
41. All documents reflecting notice of any actions taken by any special co-trustee or trust protector to Amy's Trust.
42. All documents creating liens against any property owned by Amy's Trust.
43. All disclaimers signed by Amy.
44. All powers of appointment or qualified beneficiary designations signed by Amy.
45. All other books and records of Amy's Trust.

**Unless otherwise included above, with regard to Anita's Trust produce the following:**

1. All documents reflecting a transfer of assets to Anita's Trust.
2. All documents reflecting assets owned at any time by Anita's Trust.
3. All documents reflecting a transfer of assets from Anita's Trust.
4. All invoices, statements, or other support documents for expenses incurred by Anita's Trust.
5. All documents reflecting disbursements from Anita's Trust.

6. All documents reflecting funds received by Anita's Trust.
7. All signature cards or other authorization documents, whether original or amended, and other documents establishing accounts of any type for Anita's Trust.
8. All bank account statements in the name of Anita's Trust or into which funds of Anita's Trust were deposited.
9. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 8 above.
10. All deposits or other documents reflecting credits to accounts described in number 8 above.
11. All brokerage account statements in the name of Anita's Trust or into which assets of Anita's Trust were deposited.
12. All documents reflecting deposits or credits into accounts described in number 11 above.
13. All documents reflecting debits to the accounts described in number 11 above.
14. All documents reflecting stock transactions in the accounts described in number 11 above.
15. All appraisals of real or personal property owned by Anita's Trust.
16. All inventories, accountings, or other documents listing property owned by Anita's Trust.
17. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Anita's Trust.
18. All documents reflecting analysis or calculation of changes to Anita's Trust's assets as a result of Nelva's death.
19. All support documents for the items described in numbers 16, 17, and 18 above.
20. All correspondence or other communications, including emails, relating to Anita's Trust.
21. All notices, disclosures, or accounting provided to the beneficiary of Anita's Trust.
22. All requests for distributions from Anita's Trust.
23. All analysis of and responses to requests for distributions from Anita's Trust.
24. All documents reflecting any action taken by any trustee of Anita's Trust since Nelva's death.
25. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of Anita's Trust.

26. All documents reflecting trustee compensation or reimbursement paid by Anita's Trust.
27. All documents supporting the payments described in numbers 25 and 26 above.
28. All time records for legal services, trustee services, special co-trustee services, and trust protector services provided in connection with Anita's Trust.
29. All invoices for attorney's fees, trustee services, special co-trustee services, and trust protector services, and expenses billed in connection with Anita's Trust.
30. All documents prepared by any accountant relating to Anita's Trust.
31. All expert reports relating to Anita's Trust.
32. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to Anita's Trust.
33. All invoices from investigators concerning work done for or about Anita's Trust.
34. All investigator's reports concerning work done for or about Anita's Trust.
35. All appointments, designations, acceptances, and resignations of special co-trustees for Anita's Trust.
36. All documents reflecting and supporting compensation or reimbursement to any special co-trustees.
37. All documents reflecting actions taken by any special co-trustees.
38. All appointments, designations, acceptances, and resignations of any trust protectors for Anita's Trust.
39. All documents reflecting and supporting compensation or reimbursement to any trust protectors for Anita's Trust.
40. All documents reflecting actions taken by trust protectors for Anita's Trust.
41. All documents reflecting notice of any actions taken by any special co-trustee or trust protector to Anita.
42. All documents creating liens against any property owned by Anita's Trust.
43. All disclaimers signed by Anita.
44. All powers of appointment or qualified beneficiary designations signed by Anita.
45. All other books and records of Anita's Trust.