

Documents requested:

1. All calendars reflecting appointments or phone conversations with Elmer, Nelva, or any of the Brunsting Descendants about Brunsting Issues.

RESPONSE: None in my possession.

2. All calendars reflecting meetings or telephone conferences with any attorney, accountant, appraiser, physician, expert providing opinions of any kind, or any other third parties concerning Brunsting Issues.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession.

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.

RESPONSE: Attached as 4-A. ✓

5. All memoranda, notes, or other documents memorializing tasks, conversations, or meetings concerning any Brunsting Issues.

RESPONSE: None in my possession.

6. All correspondence or communications, including emails, to or from Elmer or Nelva or any of the Brunsting Descendants concerning Brunsting Issues.

RESPONSE: None in my possession.

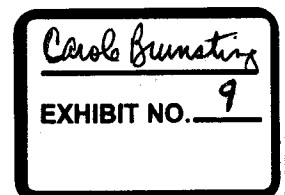
7. All correspondence or communications, including emails, to or from any other third parties concerning Brunsting Issues.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession.

9. All audio or video recordings of Nelva's execution of any documents.



RESPONSE: None in my possession.

10. All audio or video recordings of evaluations of Nelva's capacity.

RESPONSE: None in my possession.

11. All other audio or video recordings of any Brunsting family member.

RESPONSE: None in my possession.

12. All transcriptions of the recordings described in numbers 8, 9, 10, and 11 above.

RESPONSE: None in my possession.

13. All investigations made of any Brunsting family member, including any surveillance logs or reports.

RESPONSE: None in my possession.

14. All documents reflecting requests made since April 1, 2009 for evaluations of Nelva's capacity.

RESPONSE: None in my possession.

15. All reports done or evaluations made since April 1, 2009 of Nelva's capacity.

RESPONSE: None in my possession.

16. All documents reflecting the reason for and arrangements made concerning the 10/25/10 Conference Call.

RESPONSE: Attached as 16-A. ✓

17. All memos or notes concerning the 10/25/10 Conference Call.

RESPONSE: Attached as 16-A. ✓

18. All documents reflecting notification to Carl, Carl's wife, or Carl's daughter of the 10/25/10 Conference Call.

RESPONSE: None in my possession.

19. All documents reflecting notification to Nelva of the 10/25/10 Conference Call.

RESPONSE: Attached as 16-A ✓

20. All audio recordings of the 10/25/10 Conference Call.

RESPONSE: None in my possession.

21. All transcriptions of the recording described in number 20 above.

RESPONSE: N/A

22. All documents reflecting any transfers of property owned by Elmer, Nelva, the Family Trust, the Survivor's Trust, or the Decedent's Trust.

RESPONSE: None in my possession.

23. All documents reflecting actions taken and transfers made through the use of any power of attorney given by either Elmer and/or Nelva.

RESPONSE: None in my possession.

24. All documents reflecting any notices, disclosures, or explanations provided to any of the Brunsting Descendants about Brunsting Issues.

RESPONSE: Overly broad.

25. All documents reflecting explanations provided to Nelva concerning Brunsting Issues.

RESPONSE: None in my possession.

26. All documents reflecting requests for changes in Elmer or Nelva's estate planning.

RESPONSE: None in my possession.

27. All documents reflecting opposition to proposed changes in Nelva's estate planning.

RESPONSE: None in my possession.

28. All accountings, whether in draft or final form, for any trusts resulting from Elmer or Nelva's estate planning.

RESPONSE: None in my possession.

29. All documents reflecting funding of or transfers to any trusts resulting from Elmer or Nelva's estate planning.

RESPONSE: None in my possession.

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.

RESPONSE: I have no knowledge of any such documents.

31. All documents reflecting the value, description, characterization, and disposition of assets in the Family Trust at the time of Elmer's death.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession.

33. All documents reflecting Elmer or Nelva's desire to treat any of their children differently or unequally in their estate planning.

RESPONSE: None in my possession.

34. All documents reflecting Elmer or Nelva's desire to treat any of their grandchildren differently or unequally in their estate planning.

RESPONSE: None in my possession.

35. All documents reflecting the current description and value of every asset in every trust resulting from Elmer and Nelva's estate planning.

RESPONSE: None in my possession.

36. All documents reflecting the involvement of any of the Brunsting Descendants in Elmer and Nelva's estate planning.

RESPONSE: None in my possession.

37. All documents reflecting knowledge of any of the Brunsting Descendants concerning Elmer and Nelva's estate planning.

RESPONSE: None in my possession.

38. All complaints made or statements given to any agency, including, but not limited to, CPS or APS, about any Brunsting family member.

RESPONSE: None in my possession.

39. All reports from any agency relating to the complaints or statements described in number 38 above.

RESPONSE: None in my possession.

40. All communications, including emails, between Brunsting family members concerning Brunsting Issues.

RESPONSE: Overly burdensome.

41. All gift tax returns filed by Elmer and/or Nelva since the formation of the Family Trust.

RESPONSE: None in my possession.

42. All income tax returns filed by Elmer and/or Nelva since the formation of the Family Trust.

RESPONSE: None in my possession.

43. All estate tax returns, or unfiled drafts of estate tax returns, for Elmer or Nelva.

RESPONSE: None in my possession.

44. All work papers for the returns described in numbers 41, 42, and 43 above.

RESPONSE: None in my possession.

45. All documents reflecting the parties involved in the administration of any of the trusts created by Elmer and Nelva.

RESPONSE: Attached as 45-A. ✓

46. All documents reflecting control exercised over the assets of Elmer, Nelva, and the trusts they created.

RESPONSE: Attached as 45A. ✓

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.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession.

49. All documents reflecting actions taken to confirm Nelva's capacity to make estate planning decisions or execute documents.

RESPONSE:

50. All documents reflecting the steps taken to deliver documents relating to legal, financial, or asset issues to Nelva.

RESPONSE: None in my possession.

51. All documents concerning Brunsting Issues received from Nelva's attorney.

RESPONSE: None in my possession.

52. All documents tending to establish that Nelva was not being unduly influenced in her decisions after Elmer's death.

RESPONSE: None in my possession.

53. All documents reflecting any efforts made to confirm that Nelva's wishes with regard to her estate planning were the ones being implemented.

RESPONSE: None in my possession.

54. All fee agreements you have, individually or as trustee concerning Brunsting Issues, including all documents addressing any joint representation issues.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession.

56. All documents relating to the ownership and transfer or other disposition of the 3,522.42 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.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession

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.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession.

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.

RESPONSE: None to my knowledge.

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.

RESPONSE: None to my knowledge.

62. All expert opinions or reports of any kind prepared in connection with Brunsting Issues.

RESPONSE: None in my possession.

63. All billings from third parties you paid concerning Brunsting Issues relating to Nelva or any Brunsting Descendant other than yourself.

RESPONSE: None in my possession.

64. All documents reflecting any steps taken to investigate or implement possible guardianship proceedings against any Brunsting family member.

RESPONSE: None in my possession.

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.

RESPONSE: Attached as 65-A. ✓

66. All signature cards, whether original or amended, for bank accounts described in number 65 above.

RESPONSE: None in my possession.

67. All documents relating to calculation, and support for the calculation of any trustee compensation paid from any trust established by Elmer or Nelva.

RESPONSE: None in my possession.

68. All statements taken from witnesses concerning Brunsting Issues.

RESPONSE: None in my possession.

69. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Elmer or Nelva.

RESPONSE: None in my possession.

70. All support documents for the items described in number 69 above.

RESPONSE: None in my possession.

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.

RESPONSE: None in my possession.

72. All "Authorizations for Release of Protected Health Information" signed by Nelva or any trustee of the Family Trust.

RESPONSE: None in my possession.

73. Any disclaimers signed by Nelva or any Brunsting Descendant.

RESPONSE: None in my possession.

74. All records involving access to safety deposit boxes rented by Elmer and Nelva.
RESPONSE: None in my possession.
75. All inventories of property kept in or removed from the safety deposit boxes described in number 74 above.
RESPONSE: None in my possession.
76. The list circulated by Nelva to Brunsting Descendants after Elmer's death concerning personal property to be selected by the Descendants.
RESPONSE: None in my possession. Anita would not provide when asked.
77. All documents reflecting the disposition of all personal property owned by Elmer Nelva, or the Family Trust.
RESPONSE: None in my possession.
78. All records reflecting storage units rented by or containing property owned by Elmer, Nelva, or the Family Trust.
RESPONSE: Attached as 78-A. ✓
79. All inventories of property located in or removed from the storage units described in number 78 above.
RESPONSE: None to my knowledge.
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.
RESPONSE: A calendar existed but I do not have any in my possession.
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.
RESPONSE: None in my possession.
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.
RESPONSE: None in my possession.
83. All communications, including emails, with Carl concerning Nelva's estate.
RESPONSE: None to my knowledge.
84. All appraisals of personal or real property owned by Elmer or the Family Trust at Elmer's death.

RESPONSE: None that I am aware of.

85. All appraisals of personal or real property owned by Nelva or the Family Trust at Nelva's death.

RESPONSE: None to my knowledge.

86. The trust notebook maintained by Elmer and Nelva.

RESPONSE: None to my knowledge.

87. All letters of instruction from either Elmer or Nelva since formation of the Family Trust.

RESPONSE: None to my knowledge.

88. All photographs of property owned by Elmer, Nelva, or the Family Trust since formation of the Family Trust.

RESPONSE: None to my knowledge.

89. All documents you have removed from Nelva's home or safe deposit box since Elmer's death.

RESPONSE: None.

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

1. All documents transferring assets to the Family Trust.

Response: None in my possession.

2. All documents reflecting assets purchased by the Family Trust.

Response: None in my possession.

3. All documents reflecting transfers of assets at any time from the Family Trust.

Response: None in my possession.

4. All invoices, statements, or other support documents for expenses incurred by the Family Trust since April 1, 2009.

Response: None in my possession.

5. All documents reflecting disbursements from the Family Trust since April 1, 2009.

Response: None in my possession.

6. All documents reflecting funds received by the Family Trust since April 1, 2009.

Response: None in my possession.

7. All documents providing support for the right of the Family Trust to receive funds since April 1, 2009.

Response: None in my possession.

8. All documents establishing relationships of any type resulting in obligations owed by the Family Trust since April 1, 2009.

Response: None in my possession.

9. All documents establishing accounts of any type in the name of the Family Trust.

Response: None in my possession.

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.

Response: None in my possession.

11. All signature cards and beneficiary designation forms, whether original or amended, for bank accounts described in number 10 above.

Response: None in my possession.

12. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 10 above.

Response: None in my possession.

13. All deposits or other documents reflecting credits to accounts described in number 10 above.

Response: None in my possession.

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.

Response: None in my possession.

15. All signature cards or authorization forms and beneficiary designation forms, whether original or amended, for the accounts described in number 14 above.

Response: None in my possession.

16. All documents reflecting deposits or credits into accounts described in number 14 above.

Response: None in my possession.

17. All documents reflecting withdrawals from or debits to the accounts described in number 14 above.

Response: None in my possession.

18. All documents reflecting stock transactions in the accounts described in number 14 above.

Response: None in my possession.

19. All income tax returns for the Family Trust.

Response: None in my possession.

20. All income tax returns for Elmer and/or Nelva which reported income or expenses of the Family Trust.

Response: None in my possession.

21. All tax work papers for the tax returns described in numbers 19 and 20 above.

Response: None in my possession.

22. All appraisals of real or personal property owned at any time by the Family Trust.

Response: None in my possession.

23. All inventories, accountings, or other documents listing real or personal property owned by the Family Trust.

Response: None in my possession.

24. All support documents for the items described in number 23 above.

Response: None in my possession.

25. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to the Family Trust.

Response: None in my possession.

26. All support documents for the items described in number 25 above.

Response: None in my possession.

27. All documents reflecting analysis or calculation of changes to Family Trust's assets as a result of Elmer's death.

Response: None in my possession.

28. All documents reflecting analysis or calculation of changes to Family Trust's assets as a result of Nelva's death.

Response: None in my possession.

29. All documents reflecting analysis or calculation concerning amounts transferred from the Family Trust to other trusts.

Response: None in my possession.

30. All correspondence or other communications, including emails, relating to the Family Trust.

Response: Attached as 30-A.

31. The original Family Trust instrument.

Response: Attached as 45-A.

32. All restatements of the Family Trust.

Response: None in my possession.

33. All amendments to the Family Trust.

Response: None in my possession.

34. All drafts of amendments to the Family Trust which were prepared but never signed.

Response: None in my possession.

35. All appointments of trustees for the Family Trust.

Response: Attached as 45-A.

36. All resignations of trustees of the Family Trust.

Response: None in my possession.

37. All acceptances by trustees of the Family Trust.

Response: None in my possession.

38. All disclosures, notices, or accountings of the Family Trust provided to any of the Brunsting Descendants.

Response: None in my possession.

39. All consents, receipts, or acknowledgments concerning the Family Trust signed by any of the Brunsting Descendants.

Response: None in my possession.

40. All Affidavits of Authority to Act signed by any trustee of the Family Trust.

Response: None in my possession.

41. All affidavits of succession signed by any successor trustee of the Family Trust.

Response: None in my possession.

42. All affidavits described in numbers 40 and 41 above which were recorded in the real property records of any county.

Response: None in my possession.

43. All fee agreements relating to the preparation of and any other work done with regard to the Family Trust.

Response: None in my possession.

44. All time records for legal services, special co-trustee work, or trust protector work provided in connection with the Family Trust.

Response: None in my possession.

45. All invoices for attorney's fees, special co-trustee work, trust protector work, or expenses billed in connection with the Family Trust.

Response: None in my possession.

46. All documents prepared by any accountant relating to the Family Trust.

Response: None in my possession.

47. All expert reports relating to the Family Trust.

Response: None in my possession.

48. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to the Family Trust.

Response: None in my possession.

49. All invoices from investigators concerning work done for or about the Family Trust.

Response: None in my possession.

50. All investigator's reports concerning work done for or about the Family Trust.

Response: None in my possession.

51. All inventories, accountings, evaluations, or calculations done in connection with the formation of the Family Trust.

Response: None in my possession.

52. All inventories, accountings, evaluations, calculations, or other documents listing Family Trust assets done in connection with Elmer's death.

Response: None in my possession.

53. All inventories, accountings, evaluations, calculations, or other documents listing Family Trust assets done in connection with Nelva's death.

Response: None in my possession.

54. All inventories, accountings, evaluations, or calculations done in connection with any other events resulting in changes in the Family Trust's structure.

Response: None in my possession.

55. All support documents for the items described in numbers 51, 52, 53, and 54 above.

Response: None in my possession.

56. All documents evidencing or describing any trustee compensation, trust protector compensation, or reimbursement paid by the Family Trust.

Response: None in my possession.

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.

Response: None in my possession.

58. All requests for distributions from the Family Trust.

Response: None in my possession.

59. All analysis of and responses to requests for distributions from the Family Trust.

Response: None in my possession.

60. All written financial reports to beneficiaries required by XII (Section E) of the Family Trust.

Response: None in my possession.

61. All waivers by beneficiaries of the requirements of the reports described in number 60 above.

Response: None in my possession.

62. All written notices to beneficiaries of the merger of any trusts as discussed in XII (Section L) of the Family Trust.

Response: None in my possession.

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.

Response: None in my possession.

64. All appointments, designations, acceptances, or removals of trust protectors for the Family Trust.

Response: None in my possession.

65. All documents reflecting and supporting compensation paid to any trust protectors.

Response: None in my possession.

66. All documents reflecting actions taken by any trust protectors and any advance notice of those actions which were provided to the Brunsting Descendants.

Response: None in my possession.

67. All documents setting forth the qualifications of all trust protectors.

Response: None in my possession.

68. All documents creating liens against property owned by the Family Trust.

Response: None in my possession.

69. All documents reflecting the agreement of the trustees of the Family Trust to take action.

Response: None in my possession.

70. All letters of instruction from Elmer or Nelva since formation of the Family Trust.

Response: None in my possession.

71. All withdrawals from the Family Trust exercised by either Elmer or Nelva.

Response: None in my possession.

72. All other books and records of the Family Trust.

Response: None in my possession.

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

1. All documents transferring assets to the LIT.

Response: None in my possession.

2. All documents reflecting assets owned by the LIT.

Response: None in my possession.

3. All documents reflecting transfers of assets from the LIT.

- Response: None in my possession.
4. All invoices, statements, or other support documents for expenses incurred by the LIT.
- Response: None in my possession.
5. All documents reflecting disbursements for expenses from the LIT.
- Response: None in my possession.
6. All documents reflecting funds received by the LIT.
- Response: None in my possession.
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.
- Response: None in my possession.
8. All documents establishing accounts of any type in the name of the LIT since April 1, 2009.
- Response: None in my possession.
9. All bank account statements in the name of the LIT or into which funds of the LIT were deposited since April 1, 2009.
- Response: None in my possession.
10. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 9 above.
- Response: None in my possession.
11. All deposits or other documents reflecting credits to accounts described in number 9 above.
- Response: None in my possession.
12. All income tax returns for the LIT.
- Response: None in my possession.
13. All gift tax returns filed by Elmer and/or Nelva because of the existence of the LIT.
- Response: None in my possession.
14. All tax work papers for the tax returns described in numbers 12 and 13 above.
- Response: None in my possession.

15. All correspondence or other communications, including emails, relating to the LIT.
Response: None in my possession.
16. The original LIT instrument.
Response: None in my possession.
17. All disclosures, notices, or accountings provided to any of the Brunsting Descendants of the LIT.
Response: None in my possession.
18. All consents, receipts, or acknowledgments signed by any of the Brunsting Descendants of the LIT.
Response: None in my possession.
19. All fee agreements relating to preparation of and any other work done with regard to the LIT.
Response: None in my possession.
20. All time records for legal services provided in connection with the LIT.
Response: None in my possession.
21. All invoices for attorney's fees and expenses billed in connection with the LIT.
Response: None in my possession.
22. All documents prepared by any accountant relating to the LIT.
Response: None in my possession.
23. All invoices from accountants relating to the LIT.
Response: None in my possession.
24. All documents evidencing any trustee compensation paid by the LIT.
Response: None in my possession.
25. All documents supporting any trustee compensation paid by the LIT.
Response: None in my possession.
26. All other books and records of the LIT.
Response: None in my possession.

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. NONE
2. All writings signed by Nelva as described in I.A. of the 6/15/10 QBD. NONE
3. All documents evidencing the advance of funds resulting in the writings described in number 2 above. NONE
4. All correspondence relating to the 6/15/10 QBD or any advances the 6/15/10 QBD addresses. NONE
5. All drafts of amendments to the 6/15/10 QBD which were never signed. NONE
6. All notices to any beneficiaries of the Family Trust that the 6/15/10 QBD had been signed. NONE
7. All notices to any beneficiaries of advances established by the terms of the 6/15/10 QBD. NONE
8. All records reflecting gifts, loans, or other transfers of funds resulting in advances. NONE
9. All actions taken to determine Nelva's capacity on 6/15/10. NONE
10. All actions taken to determine whether Nelva was unduly influenced in connection with the 6/15/10 QBD. NONE
11. All documents describing the events which triggered the 6/15/10 QBD. NONE

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. NONE
2. All documents reflecting assets transferred to any trust established by the terms of the 8/25/10 QBD. NONE
3. All supporting calculations for the transfers described in numbers 1 and 2 above. NONE
4. All invoices, statements, or other support documents for expenses incurred by any trust established by the terms of the 8/25/10 QBD. NONE
5. All documents reflecting disbursements made by the Family Trust based upon the terms of the 8/25/10 QBD. NONE

6. All documents reflecting funds received by any other entity based upon the terms of the 8/25/10 QBD. NONE
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. NONE
8. All bank statements for the accounts described in number 7 above. NONE
9. All cancelled checks, debits, or other documents reflecting withdrawals from any bank accounts described in number 7 above. NONE
10. All deposits or other documents reflecting credits to any bank accounts described in number 7 above. NONE
11. All brokerage account statements for any trust established because of the terms of the 8/25/10 QBD. NONE
12. All signature cards or authorization forms, whether original or amended, for the accounts described in number 11 above. NONE
13. All documents reflecting deposits or transfers into accounts described in number 11 above. NONE
14. All documents reflecting stock transactions in the accounts described in number 11 above. NONE
15. All accounting work done relating to the execution of the 8/25/10 QBD. NONE
16. All accounting work done relating to the 8/25/10 QBD as a result of Nelva's death. NONE
17. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of the 8/25/10 QBD. NONE
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. NONE
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. NONE
20. All support documents for the items described in numbers 17, 18, and 19 above. NONE
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. NONE
22. All correspondence or other communications, including emails, relating to the 8/25/10 QBD. NONE
23. The original 8/25/10 QBD instrument. NONE
24. All restatements of the 8/25/10 QBD. NONE

25. All drafts of the 8/25/10 QBD or any amendments thereto which were prepared but never signed. NONE
26. All appointments of trustees for the 8/25/10 QBD. NONE
27. All resignations of trustee for the 8/25/10 QBD. NONE
28. All acceptances by trustees for the 8/25/10 QBD. NONE
29. All notices, disclosures, or accountings provided to any of the Brunsting Descendants concerning the 8/25/10 QBD. NONE
30. All consents, receipts, or acknowledgments signed by any of the Brunsting Descendants concerning the 8/25/10 QBD. NONE
31. All Affidavits of Authority to Act signed by any trustee of the 8/25/10 QBD. NONE
32. All affidavits of succession signed by any successor trustee of the 8/25/10 QBD. NONE
33. All affidavits described in numbers 31 and 32 above which were recorded in the real property records of any county. NONE
34. All fee agreements relating to the preparation of and any other work done with regard to the 8/25/10 QBD. NONE
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. NONE
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. NONE
37. All documents prepared by any accountant relating to the 8/25/10 QBD. NONE
38. All expert reports relating to the 8/25/10 QBD. NONE
39. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to the 8/25/10 QBD. NONE
40. All invoices from investigators concerning work done for or about the 8/25/10 QBD. NONE
41. All investigator's reports concerning work done for or about the 8/25/10 QBD. NONE
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. NONE
43. All documents supporting any the payments described in number 42 above. NONE
44. All requests for distributions from trusts created by the terms of the 8/25/10 QBD. NONE
45. All analysis of and responses to requests for distributions from the 8/25/10 QBD. NONE

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. NONE
47. All documents reflecting and supporting compensation or reimbursement to any special co-trustees. NONE
48. All documents reflecting actions taken by any special co-trustees. NONE
49. All appointments, designations, acceptances, or resignations of trust protectors for any trusts created according to the terms of the 8/25/10 QBD. NONE
50. All documents reflecting and supporting compensation or reimbursement to any trust protectors. NONE
51. All documents reflecting actions taken by any trust protectors for any trust created according to the terms of the 8/25/10 QBD. NONE
52. All notices, including, but not limited to, those required by paragraph C.1 on page 17 of the QBD provide 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. NONE
53. All documents creating liens against any property owned by any trust created by the 8/25/10 QBD. NONE
55. All actions taken to determine Nelva's capacity on 8/25/10. NONE
56. All actions taken to determine whether Nelva was unduly influenced in connection with the 8/25/10 QBD. NONE
57. All letters of instruction from Nelva as contemplated by paragraph c on page 9 of the 8/25/10 QBD. NONE
58. All withdrawals from trust property exercised by Nelva. NONE
59. All documents appointments, designations, acceptances, or resignations of trust protectors for any trusts created according to the terms of the 8/25/10 QBD. NONE
60. All other books and records relating to the 8/25/10 QBD. NONE

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.
Not created yet.
2. All documents reflecting assets owned at any time by Carole's Trust. Trust not funded yet.

3. All documents reflecting a transfer of assets from Carole's Trust. NONE
4. All invoices, statements, or other support documents for expenses incurred by Carole's Trust. NONE
5. All documents reflecting disbursements from Carole's Trust. NONE
6. All documents reflecting funds received by Carole's Trust. NONE
7. All signature cards or other authorization documents, whether original or amended, and other documents establishing accounts of any type for Carole's Trust. NONE
8. All bank account statements in the name of Carole's Trust or into which funds of Carole's Trust were deposited. NONE
9. All cancelled checks, debits, or other documents reflecting withdrawals from accounts described in number 8 above. NONE
10. All deposits or other documents reflecting credits to accounts described in number 8 above. NONE
11. All brokerage account statements in the name of Carole's Trust or into which assets of Carole's Trust were deposited. NONE
12. All documents reflecting deposits or credits into accounts described in number 11 above. NONE
13. All documents reflecting debits to the accounts described in number 11 above. NONE
14. All documents reflecting stock transactions in the accounts described in number 11 above. NONE
15. All appraisals of real or personal property owned by Carole's Trust. NON
16. All inventories, accountings, or other documents listing property owned by Carole's Trust. NONE
17. All balance sheets, profit and loss statements, general ledgers, or other financial summaries relating to Carole's Trust. NONE
18. All documents reflecting analysis or calculation of changes to Carole's Trust's assets as a result of Nelva's death. NONE
19. All support documents for the items described in numbers 16, 17, and 18 above. NONE
20. All correspondence or other communications, including emails, relating to Carole's Trust. NONE
21. All notices, disclosures, or accounting provided to the beneficiary of Carole's Trust. NONE
22. All requests for distributions from Carole's Trust. NONE

23. All analysis of and responses to requests for distributions from Carole's Trust. NONE
24. All documents reflecting any action taken by any trustee of Carole's Trust since Nelva's death. Trust not even funded yet.
25. All inventories, accountings, evaluations, or other asset listings done in connection with the formation of Carole's Trust. NONE
26. All documents reflecting trustee compensation or reimbursement paid by Carole's Trust. NONE
27. All documents supporting the payments described in numbers 25 and 26 above. NONE
28. All time records for legal services, trustee services, special co-trustee services, and trust protector services provided in connection with Carole's Trust. NONE
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. NONE
30. All documents prepared by any accountant relating to Carole's Trust. NONE
31. All expert reports relating to Carole's Trust. NONE
32. All invoices from accountants, appraisers, valuation experts, or any other expert for work relating to Carole's Trust. NONE
33. All invoices from investigators concerning work done for or about Carole's Trust. NONE
34. All investigator's reports concerning work done for or about Carole's Trust. NONE
35. All appointments, designations, acceptances, and resignations of special co-trustees for Carole's Trust. NONE
36. All documents reflecting and supporting compensation or reimbursement to any special co-trustees. NONE
37. All documents reflecting actions taken by any special co-trustees. NONE
38. All appointments, designations, acceptances, and resignations of any trust protectors for Carole's Trust. NONE
39. All documents reflecting and supporting compensation or reimbursement to any trust protectors for Carole's Trust. NONE
40. All documents reflecting actions taken by trust protectors for Carole's Trust. NONE
41. All documents reflecting notice of any actions taken by any special co-trustee or trust protector to Carole. NONE
42. All documents creating liens against any property owned by Carole's Trust. NONE

43. All disclaimers signed by you. NONE
44. All powers of appointment or qualified beneficiary designations signed by you. NONE
45. All documents relating to any request for or scheduling of the private meeting or telephone conference with you as contemplated by paragraph C on page 6 of the 10/25/10QBD. NONE
46. All other books and records of Carole's Trust. NONE