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NO. \_\_\_\_\_

IN RE: CARL HENRY BRUNSTING

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

RECORDER'S MEMORANDUM  
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Chris Daniel  
District Clerk

CARL HENRY BRUNSTING'S  
VERIFIED PETITION TO TAKE DEPOSITIONS BEFORE SUIT

MAR 09 2012

TO THE HONORABLE JUDGE OF SAID COURT:

Time: \_\_\_\_\_  
By: \_\_\_\_\_  
Harris County, Texas  
Deputy

Petitioner, Carl Henry Brunsting ("Petitioner"), asks the court for permission to take depositions by oral examination and/or on written questions to obtain testimony and documents to investigate his potential proceedings involving Anita Kay Brunsting ("Anita"), Amy Ruth Brunsting ("Amy"), Vacek & Freed, PLLC ("Vacek"), and Candace L. Kunz-Freed ("Freed") as authorized by Tex. R. Civ. P. 202.3(a), and in support thereof would show as follows:

1. Petitioner is a resident of Harris County, Texas and is one of the heirs of the estates of his parents, Elmer and Nelva Brunsting, who both resided in Harris County, Texas until their deaths. Petitioner is also one of the beneficiaries of the Brunsting Family Living Trust (the "Family Trust") and other trusts arising therefrom, as well as other trusts and estate planning tools implemented by his parents. Petitioner held a power of attorney for his mother, is the personal representative named in his mother's will, and was previously named to become the successor trustee of the Family Trust upon his mother's death.

2. The parties sought to be deposed and the documents, if any, to be requested of the witnesses are:

- A. Vacek, a professional limited liability company formed under the laws of Texas doing business in Harris County, Texas which may be served through its registered agent, Albert E. Vacek, Jr., at 11777 Katy Freeway, Suite 300,

CONFIRMED FILE DATE: 3/9/2012

Houston, Texas 77079. (Documents described in Exhibit A are sought from this witness)

- B. Freed, an attorney practicing with Vacek & Freed, PLLC, who also maintains an office at 11777 Katy Freeway, Suite 300, Houston, Texas 77079. (Documents described in Exhibit A are sought from this witness)
- C. Anita, Petitioner's sister, who resides in Victoria County, Texas at 203 Bloomingdale Circle, Victoria, Texas 77904. (Documents described in Exhibit B are sought from this witness)
- D. Amy, Petitioner's sister, who resides in Comal County, Texas at 2582 Country Ledge, New Braunfels, Texas 78132. (Documents described in Exhibit C are sought from this witness)
- E. Carole Ann Brunsting, Petitioner's sister, who resides in Harris County, Texas at 5822 Jason St., Houston, Texas 77074. (Documents described in Exhibit D are sought from this witness)
- F. Computershare Investor Services, LLC, the transfer agent for ExxonMobil Shareholder Services, a foreign limited liability company formed under the laws of Delaware, but which does business in Texas and may be served through its registered agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7<sup>th</sup> Street, Suite 620, Austin, Texas 78701. (Documents described in Exhibit E are sought from this witness)

- G. Rosewood Family Physicians I, PLLC, a professional limited liability company formed under the laws of Texas doing business in Harris County, Texas which may be served through its registered agent, Clarence F. Kendall, II, at 3318 Mercer Rd., Houston, Texas 77069. (Documents described in Exhibit F are sought from this witness)
- H. Dr. Robert White, 4843 McDermed Dr., Houston, Harris County, Texas 77035. (Documents described in Exhibit F to be produced by this witness)
- I. Medical Chest Associates, PA, a professional association formed under the laws of Texas doing business in Harris County, Texas which may be served through its registered agent, G. Thomas Keith, at 902 Frostwood Drive, Suite 188, Houston, Texas 77024. (Documents described in Exhibit F are sought from this witness)
- J. Dr. Ajay Jain, an associate with Medical Chest Associates, PA, who also maintains an office at 902 Frostwood Drive, Suite 188, Houston, Texas 77024. (Documents described in Exhibit F are sought from this witness)
- K. Tino Vasquez, a former care giver for Nelva Brunsting.
- L. Robert Cantu, a former care giver for Nelva Brunsting.
- M. Rudolf & Srikumala Suhendra, neighbors of Nelva Brunsting, who reside in Harris County, Texas at 13626 Pinerock Ln., Houston, Texas 77079.
- N. The Northern Trust Company, a trust company organized under the laws of Illinois, which has its headquarters in Illinois, but which does business in Texas and may be served through its registered agent, Texas Secretary of

State, c/o Citations Unit, P.O. Box 12079, Austin, TX 78711-2079.

(Documents described in Exhibit G are sought from this witness)

- O. The Frost National Bank, NA, a Texas financial institution, which may be served through its registered agent, Stan McCormick, 100 West Houston St., San Antonio, Texas 78205. (Documents described in Exhibit H are sought from this witness)
- P. Bank of America, NA, a financial institution organized under the laws of Delaware, which has its headquarters in North Carolina, but which does business in Texas and may be served through its registered agent, CT Corporation System, 350 N. Saint Paul, Suite 2900, Dallas, Texas 75201-4234 (Documents described in Exhibit I are sought from this witness)

3. Petitioner seeks to take these depositions to investigate the need for potential legal proceedings. Petitioner is attempting to determine whether claims belonging to his mother's estate exist and should be pursued. Petitioner also anticipates being the plaintiff in a lawsuit seeking declaratory relief concerning the interpretation, rights, and responsibilities relating to the Family Trust and his mother's estate, including issues relevant to his role as his mother's attorney-in-fact and as the named executor and trustee in his mother's will, as well as the interplay of the various estate planning tools prepared for his mother by Freed and Vacek. The standard of care exercised by Freed and Vacek must also be examined. The investigation of the circumstances and relevant transactions resulting from documents Freed and Vacek prepared, the use of which they also supervised, may lead to possible additional actions for which just cause exists. That depends, to

some extent, on whether the following actions, among others, have been taken by his sisters Anita and Amy, with the assistance of Freed and Vacek:

- (A) unduly influencing Petitioner's mother concerning changes made to certain documents at a time when her capacity was also in question;
- (B) obtaining control over certain entities and assets for their own benefit and to the specific detriment of Petitioner and other heirs;
- (C) improperly transferring assets belonging to one or more of Petitioner's deceased parents or trusts they created by improperly using either a power of attorney or their position as a trustee;
- (D) mismanaging or otherwise improperly depleting his parents' assets or the Family Trust's assets, preventing the administration of probate assets, and otherwise breaching fiduciary duties;
- (E) preventing Petitioner from exercising his rights and responsibilities as his mother's attorney-in-fact and as personal representative of his mother's estate; and
- (F) interfering with Petitioner's inheritance rights and the inheritance rights of other heirs.

4. Depending on the facts, a number of causes of action may exist as a result of the actions being investigated. Anita, whose phone number is 361.576.5732; Amy, whose phone number is 830.625.8352; Vacek, whose number is 281.531.5800; and Freed, whose phone number is also 281.531.5800, may have interests adverse to Petitioner in any anticipated suits.

5. This petition is filed in Harris County, Texas, where the anticipated suit(s) would be filed, where potential improper actions would have taken place, where the majority of the deponents reside or do business, and where Petitioner's parents both resided until their deaths.

6. Petitioner asks the court to issue an order authorizing him to examine the witnesses named above by oral and/or written deposition and to obtain the documents specified in the exhibits attached hereto for certain of those witnesses.

7. Petitioner has not brought or been a party to a suit that arises out of the facts that are the subject of this verified petition.

8. The discovery is needed to investigate, among other things:

- (A) Petitioner's mother's capacity when changes were made concerning her estate, including changes to her interests in and position of authority over the Family Trust, which ultimately resulted in the transfer of assets and authority;
- (B) circumstances surrounding the changes made to Petitioner's mother's interest in the Family Trust, including whether she made those changes because of undue influence exercised by Anita, Amy and/or any other third party;
- (C) whether power(s) of attorney were signed and/or revoked by Petitioner's mother, and if so, what the circumstances were and what was done using any such power(s) of attorney;
- (D) actions which have been taken to transfer or disburse assets owned by Petitioner's parents, outside of the Family Trust;
- (E) actions which have been taken to transfer or disburse assets owned by the Family Trust and other trusts resulting from its terms;
- (F) current status of all such trusts;
- (G) current status of assets formerly owned by Petitioner's parents or the Family Trust;
- (H) disbursements made from Petitioner's mother's individual or trust assets;

- (I) assets received by any of the other Brunsting descendants from their parents' individual or trust assets;
- (J) when and how assets were handled both before and after Petitioner's parents' deaths and whether that was done improperly;
- (K) the current status of the assets in the Family Trust, as well as any and all trusts established by its terms;
- (L) the current status of the assets held for any of the Brunsting children, whether in trust or otherwise, which were either received from Petitioner's parents or were paid because of their deaths;
- (M) all actions taken by Freed, Vacek, Anita and/or Amy to comply with their fiduciary obligations;
- (N) all actions taken by Freed, Vacek, Anita and/or Amy in violation of their fiduciary obligations;
- (O) all actions taken by Freed, as a representative of Vacek in representing the interests of Petitioners' parents and whether those actions were within the standard of care required of a reasonably prudent attorney performing such services; and
- (P) conflicts of interest which were not disclosed or were improperly addressed by Freed, as a representative of Vacek.

9. Petitioner expects to obtain documents and/or elicit testimony from these witnesses concerning, among other things,

- (A) Petitioner's mother's capacity during the relevant period;
- (B) contacts with Petitioner's mother;

- (C) the circumstances surrounding changes made by Petitioner's mother in estate planning arrangements;
- (D) the treatment of payments made by Petitioner's parents to their children;
- (E) Petitioner's mother's powers of attorney, if any, and transactions thereunder;
- (F) the exercise of control over and disposition of Petitioner's parents' individual or trust assets;
- (G) how that control was obtained and used;
- (H) the disposition of assets;
- (I) a current evaluation and accounting of those assets;
- (J) inventories and valuations of assets;
- (K) compliance, or lack thereof, with fiduciary obligations; and
- (L) the standard of care exercised by Freed and Vacek.

10. Petitioner requests that the court order the witnesses to appear for their deposition at a time and place established by Petitioner and, unless obtained by deposition on written questions, that the applicable documents specified in the exhibits attached hereto be produced by those witnesses to Petitioner's counsel 7 days prior to the oral deposition of that witness.

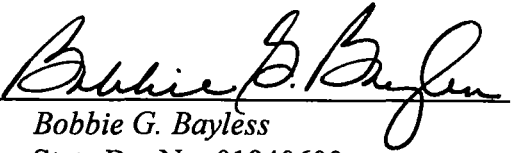
11. The requested depositions may prevent the filing of an action or may prevent a failure or delay of justice if a suit is warranted. The likely benefit of allowing the Petitioner to take the requested depositions to investigate potential claims far outweighs the burden or expense of the procedure.

12. Petitioner asks the court to set this petition for hearing and, after the hearing, order the depositions and production of documents identified herein. Petitioner also seeks such other relief to which he may be entitled.



Respectfully submitted,

BAYLESS & STOKES

By: 

*Bobbie G. Bayless*

State Bar No. 01940600

2931 Ferndale

Houston, Texas 77098

Telephone: (713) 522-2224

Telecopier: (713) 522-2218

*Attorneys for Petitioners*

THE STATE OF TEXAS   §  
  §  
COUNTY OF HARRIS   §

BEFORE ME, the undersigned authority, on this day personally appeared CARL HENRY BRUNSTING, who being duly sworn on oath deposed and said that he is the Petitioner in the above-entitled and numbered cause; that he has read the above petition; and that the statements contained therein are within his personal knowledge and are true and correct.

*Carl Henry Brunsting*  
CARL HENRY BRUNSTING

SUBSCRIBED AND SWORN TO before me, on this 8<sup>th</sup> day of March, 2012, to certify which witness my hand and seal of office.



*Shawn M. Teague*  
Notary Public, in and for the  
State of T E X A S  
Printed Name Shawn M. Teague  
My Commission Expires 4-3-2015

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing instrument was forwarded to counsel of record via Certified Mail, Return Receipt Requested on the 9<sup>th</sup> day of March, 2012, as follows:

Albert E. Vacek, Jr.  
Vacek & Freed, PLLC  
11777 Katy Freeway, Suite 300  
Houston, TX 77079

Medical Chest Associates, PA  
c/o G. Thomas Keith  
902 Frostwood Drive, Suite 188  
Houston, TX 77024

Candace L. Kunz-Freed  
Vacek & Freed, PLLC  
11777 Katy Freeway, Suite 300  
Houston, TX 77079

Dr. Ajay Jain  
902 Frostwood Drive, Suite 188  
Houston, TX 77024

Anita Kay Brunsting  
203 Bloomingdale Circle  
Victoria, TX 77904

Rudolf & Srikumala Suhendra  
13626 Pinerock Ln.  
Houston, TX 77079

Amy Ruth Brunsting  
2582 Country Ledge  
New Braunfels, TX 78132

Tino Vasquez  
c/o 13630 Pinerock Ln.  
Houston, TX 77079

Carole Ann Brunsting  
5822 Jason St.  
Houston, TX 77074

The Northern Trust Company  
c/o Texas Secretary of State  
Citations Unit  
P.O. Box 12079  
Austin, TX 78711-2079

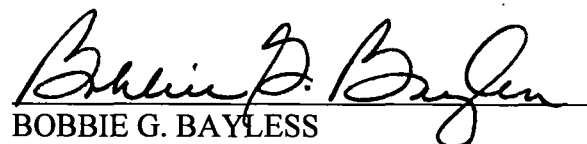
Computershare Investor Services, LLC  
c/o CSC-Lawyers Incorporating Service Company  
211 E. 7<sup>th</sup> Street, Suite 620  
Austin, TX 78701

The Frost National Bank, NA  
c/o Stan McCormick  
100 West Houston St.  
San Antonio, TX 78205

Rosewood Family Physicians I, PLLC  
c/o Clarence F. Kendall, II  
3318 Mercer Rd.  
Houston, TX 77069

Bank of America, NA  
c/o CT Corporation System  
350 N. Saint Paul, Suite 2900  
Dallas, TX 75201-4234

Dr. Robert White  
4843 McDermid Dr.  
Houston, TX 77035

  
BOBBIE G. BAYLESS

**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.

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**Documents to be Produced by Anita Kay Brunsting**

**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 medical, legal, and financial issues relating to Elmer, Nelva, or the Brunsting Descendants since formation of the Family Trust. 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 medical, legal, or financial matters relating to any member of the Brunsting family falls within this definition. Also included within this definition are any gifts or loans received by any Brunsting Descendant from Elmer, Nelva, or the Family Trust since formation of the Family Trust. Birthday and Christmas gifts which do not result in annual gifts exceeding the annual gift exclusion are not included, but amounts, including, among other things, those related to education, divorce, adoption, satisfaction of mortgages, home improvements, purchase of vehicles, and medical expenses are included.

“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.

**EXHIBIT B**

CONFIRMED FILE DATE: 3/9/2012

“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.

“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 about Brunsting Issues.
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.
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 concerning Brunsting Issues.
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 concerning Brunsting Issues.
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 received from Nelva's attorney.
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, individually or as trustee, concerning Brunsting Issues, 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 you paid concerning Brunsting Issues relating to Nelva or any Brunsting Descendant other than yourself.
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 you or Amy have removed 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 you.
44. All powers of appointment or qualified beneficiary designations signed by you.
45. All other books and records of Anita's Trust.



**Documents to be Produced by Amy Ruth Brunsting**

**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 medical, legal, and financial issues relating to Elmer, Nelva, or the Brunsting Descendants since formation of the Family Trust. 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 medical, legal, or financial matters relating to any member of the Brunsting family falls within this definition. Also included within this definition are any gifts or loans received by any Brunsting Descendant from Elmer, Nelva, or the Family Trust since formation of the Family Trust. Birthday and Christmas gifts which do not result in annual gifts exceeding the annual gift exclusion are not included, but amounts, including, among other things, those related to education, divorce, adoption, satisfaction of mortgages, home improvements, purchase of vehicles, and medical expenses are included.

“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.

**EXHIBIT C**

“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.

“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 about Brunsting Issues.
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.
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 concerning Brunsting Issues.
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 concerning Brunsting Issues.
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 received from Nelva's attorney.
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, individually or as trustee, concerning Brunsting Issues, 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 you paid concerning Brunsting Issues relating to Nelva or any Brunsting Descendant other than yourself.
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 you or Anita have removed 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 you.
44. All powers of appointment or qualified beneficiary designations signed by you.
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.

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**Documents to be Produced by Carole Ann Brunsting**

**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 medical, legal, and financial issues relating to Elmer, Nelva, or the Brunsting Descendants since formation of the Family Trust. 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 medical, legal, or financial matters relating to any member of the Brunsting family falls within this definition. Also included within this definition are any gifts or loans received by any Brunsting Descendant from Elmer, Nelva, or the Family Trust since formation of the Family Trust. Birthday and Christmas gifts which do not result in annual gifts exceeding the annual gift exclusion are not included, but amounts, including, among other things, those related to education, divorce, adoption, satisfaction of mortgages, home improvements, purchase of vehicles, and medical expenses are included.

“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.

**EXHIBIT D**



“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.

“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 about Brunsting Issues.
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.
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 concerning Brunsting Issues.
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 concerning Brunsting Issues.
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 received from Nelva's attorney.
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, individually or as trustee concerning Brunsting Issues, 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 you paid concerning Brunsting Issues relating to Nelva or any Brunsting Descendant other than yourself.
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 you have removed 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 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 you.
44. All powers of appointment or qualified beneficiary designations signed by you.
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.
46. All other books and records of Carole's Trust.

**Documents to be Produced by Computershare  
as transfer agent for Exxon Mobil Corporation**

1. All documents reflecting the acquisition of any Exxon Mobil Corporation stock by Elmer Brunsting, Nelva Brunsting, and/or The Brunsting Family Living Trust.
2. All documents reflecting any transfers of all or any portion of the stock described in number 1 above.
3. All documents reflecting any sale or other liquidation of all or any portion of the stock described in number 1 above.
4. All documents reflecting the current ownership of all or any portion of the stock described in number 1 above.
5. All communications, including emails, concerning the stock described in number 1 above or any transfers of all or any portion of the stock described in number 1 above.
6. All documents authorizing the transfer of all or any portion of the stock described in number 1 above.
7. All documents evidencing the payment of dividends on the stock described in number 1 above.

**EXHIBIT E**

**Documents to be Produced by Rosewood Family Physicians I, PLLC, Dr. Robert White,  
Medical Chest Associates, PA, and Dr. Ajay Jain**

1. All medical records for Nelva Brunsting from January 1, 2010 until her death on November 11, 2011.
2. All documents reflecting requests for competency evaluations of Nelva Brunsting from January 1, 2010 until her death on November 11, 2011.
3. All reports concerning Nelva Brunsting's competency prepared since January 1, 2010.
4. All memoranda or notes concerning Nelva Brunsting's competency from January 1, 2010 until her death.
5. All communications, including emails, from or to any attorneys concerning Nelva Brunsting.
6. All communications, including emails, from or to any of Nelva Brunsting's children.
7. All documents reflecting the dates on which Dr. Robert White or any other physician at Rosewood Family Physicians I, PLLC met with or examined Nelva Brunsting from January 1, 2010 until her death on November 11, 2011.
8. All consent forms or other documents presented since January 1, 2010 to obtain copies of Nelva Brunsting's medical records.

**EXHIBIT F**

**Documents to be Produced by Northern Trust Company**

**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.

**EXHIBIT G**

“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.

“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 account statements, cancelled checks, deposits, and deposited items for accounts in the name of the Family Trust.
2. All account statements, cancelled checks, deposits, and deposited items for accounts in the name of any trust created as a result of the 8/25/10 QBD.
3. All documents reflecting stock or other assets purchases, sales, or transfers relating to non-cash assets of the Family Trust.
4. All documents reflecting stock or other assets purchases, sales, or transfers relating to non-cash assets of any trust created as a result of the 8/25/10 QBD.
5. All correspondence or other communications, including emails, with Nelva or any of the Brunsting Descendants relating to Brunsting Issues.
6. All correspondence or communications, including emails, with any other third parties concerning Brunsting Issues.
7. All documents identifying assets held by the Family Trust or any trust created by the 8/25/10.
8. All documents reflecting any accountings provided to Nelva or any of the Brunsting Descendants.
9. All documents reflecting any notices or disclosures provided to Nelva or any of the Brunsting Descendants.

10. All inventories of any assets of the Family Trust or any trust created by the 8/25/10 QBD.
11. All appraisals of any assets of the Family Trust or any trust created by the 8/25/10 QBD.
12. All photographs of any assets of the Family Trust or any trust created by the 8/25/10 QBD.
13. All expert's reports of any assets of the Family Trust or any trust created by the 8/25/10 QBD.

CONFIRMED FILE DATE: 3/9/2012

**Documents to be Produced by Frost Bank**

**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 Cari 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.

**EXHIBIT H**

“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.

“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 account statements, cancelled checks, deposits, and deposited items for accounts in the name of the Family Trust.
2. All account statements, cancelled checks, deposits, and deposited items for accounts in the name of any trust created as a result of the 8/25/10 QBD.
3. All documents reflecting stock or other assets purchases, sales, or transfers relating to non-cash assets of the Family Trust.
4. All documents reflecting stock or other assets purchases, sales, or transfers relating to non-cash assets of any trust created as a result of the 8/25/10 QBD.
5. All correspondence or other communications, including emails, with Nelva or any of the Brunsting Descendants relating to Brunsting Issues.
6. All correspondence or communications, including emails, with any other third parties concerning Brunsting Issues.
7. All documents identifying assets held by the Family Trust or any trust created by the 8/25/10.
8. All documents reflecting any accountings provided to Nelva or any of the Brunsting Descendants.
9. All documents reflecting any notices or disclosures provided to Nelva or any of the Brunsting Descendants.



10. All inventories of any assets of the Family Trust or any trust created by the 8/25/10 QBD.
11. All appraisals of any assets of the Family Trust or any trust created by the 8/25/10 QBD.
12. All photographs of any assets of the Family Trust or any trust created by the 8/25/10 QBD.
13. All expert's reports of any assets of the Family Trust or any trust created by the 8/25/10 QBD.

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**Documents to be Produced by Bank of America**

1. All rental agreements for any safe deposit box rented by Elmer Brunsting, Nelva Brunsting, or the Brunsting Family Living Trust.
2. All signature or other authorization documents for any safe deposit box rented by Elmer Brunsting, Nelva Brunsting, or the Brunsting Family Living Trust.
3. All documents reflecting the parties accessing any safe deposit box rented by Elmer Brunsting, Nelva Brunsting, or the Brunsting Family Living Trust.
4. All inventories of items held in any safe deposit box rented by Elmer Brunsting, Nelva Brunsting, or the Brunsting Family Living Trust.
5. All billing records for any safe deposit box rented by Elmer Brunsting, Nelva Brunsting, or the Brunsting Family Living Trust.

CONFIRMED FILE DATE: 3/9/2012

NO. \_\_\_\_\_

IN RE: CARL HENRY BRUNSTING

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§  
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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

\_\_\_\_\_ JUDICIAL DISTRICT

**ORDER ON CARL HENRY BRUNSTING'S  
VERIFIED PETITION TO TAKE DEPOSITIONS BEFORE SUIT**

After considering the Petition of Carl Henry Brunsting, asking the court for permission to take oral and written depositions to investigate potential claims, the response, if any, and arguments of counsel, the court GRANTS the request and finds that allowing Petitioner to take the requested depositions may prevent a failure or delay of justice in an anticipated suit and that the likely benefit of allowing the Petitioner to take the requested depositions to investigate potential claims outweighs the burden or expense of the procedure.

It is therefore ORDERED that petitioner may take the oral and/or written deposition of

- A. Vacek & Freed, PLLC;
- B. Candace L. Kunz-Freed, an attorney practicing with Vacek & Freed, PLLC;
- C. Carole Ann Brunsting;
- D. Anita Brunsting;
- E. Amy Brunsting;
- F. Computershare Investor Services, LLC, the transfer agent for ExxonMobil Shareholder Services;
- G. Rosewood Family Physicians I, PLLC;
- H. Dr. Robert White;
- I. Medical Chest Associates, PA;

- J. Dr. Ajay Jain;
- K. Tino Vasquez;
- L. Robert Cantu;
- M. Rudolf & Srikumala Suhendra;
- N. The Northern Trust Company;
- O. The Frost National Bank, NA; and
- P. Bank of America, NA

at a time and place arranged by Petitioner's counsel.

Unless the documents are being obtained by deposition on written questions, the following witnesses are also directed to deliver the documents specified in the applicable exhibits attached hereto to the offices of Petitioner's counsel at least 7 days prior to their deposition:

- A. Vacek & Freed, PLLC (Documents described in Exhibit A to be produced by this witness)
- B. Candace L. Kunz-Freed (Documents described in Exhibit A to be produced by this witness)
- C. Anita Brunsting (Documents described in Exhibit B to be produced by this witness)
- D. Amy Brunsting (Documents described in Exhibit C to be produced by this witness)
- E. Carole Ann Brunsting (Documents described in Exhibit D to be produced by this witness)

- F. Computershare Investor Services, LLC, the transfer agent for ExxonMobil Shareholder Services (Documents described in Exhibit E to be produced by this witness)
- G. Rosewood Family Physicians I, PLLC (Documents described in Exhibit F to be produced by this witness)
- H. Dr. Robert White (Documents described in Exhibit F to be produced by this witness)
- I. Medical Chest Associates, PA (Documents described in Exhibit F to be produced by this witness)
- J. Dr. Ajay Jain (Documents described in Exhibit F to be produced by this witness)
- K. The Northern Trust Company (Documents described in Exhibit G to be produced by this witness)
- L. The Frost National Bank, NA (Documents described in Exhibit H to be produced by this witness)
- M. Bank of America, NA (Documents described in Exhibit I to be produced by this witness)

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

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PRESIDING JUDGE

CONFIRMED FILE DATE: 3/9/2012

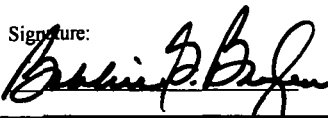
CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY) **2012 14538** COURT (FOR CLERK USE ONLY): **80**

STYLED In re: **Carl Henry Brunsting**

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing. This sheet, approved by the Texas Judicial Council, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

<b>1. Contact information for person completing case information sheet:</b>		<b>Names of parties in case:</b>	<b>Person or entity completing sheet is:</b>
Name: <b>Bobbie G. Bayless</b>	Email: <b>bayless@baylessstokes.com</b>	Plaintiff(s)/Petitioner(s): <b>Carl Henry Brunsting</b>	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other:
Address: <b>2931 Ferndale</b>	Telephone: <b>713.522.2224</b>	Defendant(s)/Respondent(s): <b>Anita Kay Brunsting; Amy Ruth Brunsting;</b> <b>Vacek &amp; Freed, PLLC; and</b> <b>Candace L. Kunz-Freed</b>	Additional Parties in Child Support Case:  Custodial Parent:  Non-Custodial Parent:  Presumed Father:
City/State/Zip: <b>Houston, TX 77098</b>	Fax: <b>713.522.2218</b>	[Attach additional page as necessary to list all parties]	
Signature: 	State Bar No: <b>01940600</b>		

**2. Indicate case type, or identify the most important issue in the case (select only 1):**

Civil		Family Law		
<b>Contract</b>	<b>Injury or Damage</b>	<b>Real Property</b>	<b>Marriage Relationship</b>	<b>Post-judgment Actions (non-Title IV-D)</b>
<input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract:  <b>Foreclosure</b> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <b>Malpractice</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability:  <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <b>Product Liability</b> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage:	<input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property:  <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other:	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children  <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other:	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other  <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order  <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent/Child:
<b>Employment</b>	<b>Other Civil</b>			
<input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:	<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property	<input type="checkbox"/> Lawyer Discipline <input checked="" type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other:	<div style="text-align: center;"> <p><b>FILED</b></p> <p>Chris Daniel District Clerk</p> <p>MAR 09 2012 4:14 PM</p> <p>Harris County, Texas</p> </div>	
<b>Tax</b>	<b>Probate &amp; Mental Health</b>			
<input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	<b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings		<input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other:	

**3. Indicate procedure or remedy, if applicable (may select more than 1):**

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
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