

pg-3

**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.

Unofficial Copy Office of Marilyn Burgess District Clerk