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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.

Unofficial Copy Office of Marilyn Burgess District Clerk

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

IN RE: CARL HENRY BRUNSTING

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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