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NO. _____

IN RE: CARL HENRY BRUNSTING

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IN THE DISTRICT COURT OF
HARRIS COUNTY, TEXAS

RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging

80 JUDICIAL DISTRICT FILED
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