Ν	0. 412,249-401	
ESTATE OF	<b>§</b>	IN PROBATE COURT
NELVA E. BRUNSTING,	§ §	NUMBER FOUR (4) OF
DECEASED	§ §	HARRIS COUNTY, TEXAS
	·····	
CARL HENRY BRUNSTING, et al	§	
V.	§ 8	
v .	s §	
ANITA KAY BRUNSTING, et al	<b>§</b>	

....

## **Defendant Co-Trustee Anita Brunsting's** <u>Motion to Obtain an Appraisal(s)</u>

## I. <u>Argument</u>

1.01. Recent activity in this case has prompted settlement discussions. In order to have full and meaningful settlement discussions, the parties need current asset values.

1.02. One of the trust assets is a 143-acre tract of land in Iowa (the "Property").<sup>1</sup> The Property was last appraised in 2012. Thus, a current appraisal(s) is needed to help the parties make an informed decision about the litigation and/or settlement.

## II. <u>Relief Sought</u>

Defendant requests that she be authorized to obtain an appraisal(s) provided the cost of same does not exceed \$4,500.00, and such other and further relief, legal and equitable, general and special, to which Defendant may be entitled to receive.

<sup>&</sup>lt;sup>1</sup> The Northwest Fractional Quarter (MW Frt. 1/4) of Section Two (2), Township Ninetysix (96), Range Forty-Five (45) West of the 5th P.M. EXCEPT the North 542.5 Feet of the West 660 Feet in Sioux County, Iowa.

Respectfully submitted,

//s// Timothy J. Jadloski

Stephen A. Mendel (13930650) Timothy J. Jadloski (24085994) The Mendel Law Firm, L.P. 1155 Dairy Ashford, Suite 104 Houston, TX 77079 O: 281-759-3213 F: 281-759-3214 E: info@mendellawfirm.com

Attorneys for the Defendant, Anita Brunsting

## **<u>Certificate of Service</u>**

I certify that a true and correct copy of the foregoing was served upon the following:

Neal Spielman Griffin & Matthews 1155 Dairy Ashford, Suite 300 Houston, TX 77079 O: 281-870-1124 F: 281-870-1647 E: <u>nspielman@grifmatlaw.com</u>	Attorney for Amy Brunsting
Bobbie G. Bayless 2931 Ferndale Houston, Texas 77098 O: 713-522-2224 F: 713-522-2218 E: <u>bayless@baylessstokes.com</u>	Attorney for Drina Brunsting, Alleged Attorney in Fact for Carl Brunsting
Candace Louis Curtis 218 Landana St. American Canyon, California 94503 E: <u>occurtis@sbcglobal.net</u>	Pro Se
Carole Ann Brunsting 5822 Jason St. Houston, Texas 77074 E: <u>cbrunsting@sbcglobal.net</u>	Pro Se
via eService on this January 28, 2019.	

//s// Timothy J. Jadloski

Timothy J. Jadloski