## NO. 412.249-401

ESTATE OF	§	IN PROBATE COURT
NELVA E. BRUNSTING,	§ § §	NUMBER FOUR (4) OF
DECEASED	<b>§</b>	HARRIS COUNTY, TEXAS
CARL HENRY BRUNSTING, individually and as independent executor of the estates of Elmer H.	§ § §	IN PROBATE COURT
Brunsting and Nelva E. Brunsting vs.	& & & & & & & & & & & & & & & & & & &	
ANITA KAY BRUNSTING f/k/a ANITA KAY RILEY, individually, as attorney-in-fact for Nelva E. Brunsting, and as Successor Trustee of the Brunsting	§ § §	NUMBER FOUR (4) OF
Family Living Trust, the Elmer H. Brunsting Decedent's Trust, the Nelva E. Brunsting Survivor's Trust,	\$ \$ \$	NUMBER FOUR (4) OF
the Carl Henry Brunsting Personal Asset Trust, and the Anita Kay Brunsting Personal Asset Trust;	\$ \$ \$ \$	
AMY RUTH BRUNSTING f/k/a AMY RUTH TSCHIRHART, individually and as Successor Trustee	§ §	
of the Brunsting Family Living Trust, the Elmer H. Brunsting Decedent's Trust, the Nelva E. Brunsting Survivor's Trust, the Carl Honey Proposing Personal	§ § §	
the Carl Henry Brunsting Personal Asset Trust, and the Amy Ruth Tschirhart Personal Asset Trust; CAROLE ANN BRUNSTING, individually	\$ \$ \$	
and as Trustee of the Carole Ann Brunsting Personal Asset Trust; and as a nominal defendant only,	8 8 8	
CANDACE LOUISE CURTIS	§ §	HARRIS COUNTY, TEXAS

RESPONSE TO AMY BRUNSTING'S MOTION FOR CLARIFICATION AND/OR MOTION TO DISMISS

TO THE HONORABLE HARRIS COUNTY PROBATE COURT:

COMES NOW Drina Brunsting as attorney-in-fact for Carl Henry Brunsting, individually

("Carl"), responding to Amy Brunsting's Motion for Clarification and/or Motion to Dismiss by

incorporating by reference Carl's Objection filed on March 23, 2015 to Amy Ruth Brunsting's

Application to be Named Successor Executor.

WHEREFORE, PREMISES CONSIDERED, Carl asks that Amy Brunsting's Application

to be named Successor Executor be denied, and for such other and further relief to which Carl may

be entitled.

Respectfully submitted,

**BAYLESS & STOKES** 

By: /s/ Bobbie G. Bayless

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Attorneys for Drina Brunsting, attorney-in-

fact for Carl Henry Brunsting

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing instrument was forwarded on the 4<sup>th</sup> day of February, 2019, as follows:

Stephen A. Mendel The Mendel Law Firm, LP 1155 Dairy Ashford, Suite 104 Houston, Texas 77079 via Telecopier (281.759.3214)

Carole Brunsting, *Pro Se* 5822 Jason St. Houston, Texas 77074 *via U.S. First Class Mail*  Neal Spielman Griffin & Matthews 1155 Dairy Ashford, Suite 300 Houston, Texas 77079 via Telecopier (281.870.1647)

Candace Curtis, *Pro Se* 218 Landana St. American Canyon, California 94503 *via Email* 

/s/ Bobbie G. Bayless
BOBBIE G. BAYLESS