

THOMPSON COE

Thompson, Coe, Cousins & Irons, L.L.P.
Attorneys and Counselors

Cory S. Reed
Direct Dial: (713) 403-8213
creed@thompsoncoe.com

Austin
Dallas
Houston
Los Angeles
New Orleans
Saint Paul

February 26, 2019

VIA EMAIL

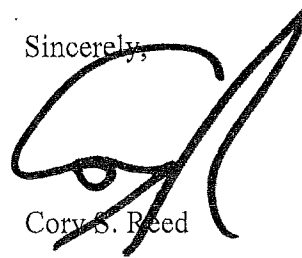
Carole Brunsting
5822 Jason Street
Houston, Texas 77074

Re: Cause No. 412,249-401; *Estate of Nelva E. Brunsting, Deceased*; In the Probate Court Number Four of Harris County, Texas.

Dear Ms. Brunsting:

In order to alleviate any privilege issues with respect to the documents responsive to Anita Brunsting's Subpoena for Documents and Tangible Things and potential testimony in Ms. Kunz-Freed's upcoming deposition, we are trying to obtain formal waivers of all claimed privileges from the parties. In that regards, please find the enclosed proposed waiver. After reviewing the document, please give us a call with any questions. We are hoping to have waivers in place for all interested parties prior to March 1, 2019.

Sincerely,



Cory S. Reed

Enclosure

6741016v1
00520.415

1



ESTATE OF	§	IN PROBATE COURT
NELVA E. BRUNSTING,	§	NUMBER FOUR (4) OF
DECEASED	§	HARRIS COUNTY, TEXAS

CARL HENRY BRUNSTING, et al	§	
V.	§	
ANITA KAY BRUNSTING, et al	§	

PRIVILEGE WAIVER AGREEMENT

I, Carole Brunsting, hereby voluntarily waive any claimed privileges (including but not limited to attorney-client and work-product) and consent to allow Candace L. Kunz-Freed, Albert E. Vacek Jr., and Vacek & Freed, PLLC the right to disclose any information and/or documents which might be properly withheld pursuant to the Texas Rules of Civil Procedure, Texas Rules of Evidence, and the Texas Disciplinary Rules of Professional Conduct.

As a heir to the Estate of Nelva E. Brunsting, I, fully and forever release, acquit, and discharge Candace L. Kunz-Freed, Vacek & Freed, PLLC, and Albert E. Vacek Jr. from any and all claims, actions, causes of action, demands, rights, damages, costs of whatsoever kind or nature related to any disclosure of confidential or privileged information pursuant to the attorney-client and work-product privilege between Candace L. Kunz-Freed, Albert E. Vacek Jr., Vacek & Freed, PLLC and the Estate of Nelva E. Brunsting.

I understand prior to the disclosure of any confidential or privileged information have the right to withdraw my agreement to this waiver and instruct my representative(s) to invoke the applicable privilege on my behalf.

Nothing in this agreement precludes any party's right to invoke the rights and remedies available under Texas Rule of Civil Procedure 193.3(d).

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Carole Brunsting and acknowledged that she is duly authorized and empowered to make this Privilege Waiver Agreement on behalf of herself, that she has read the foregoing Agreement, and fully understands it to be a complete release of all privileges as described therein, and that she has executed the same for the purposes expressed therein, in the capacities stated therein.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this _____ day of February, 2019.

AFFIANT: CAROLE BRUNSTING

THOMPSON COE

Thompson, Coe, Cousins & Irons, L.L.P.
Attorneys and Counselors

Cory S. Reed
Direct Dial: (713) 403-8213
creed@thompsoncoe.com

Austin
Dallas
Houston
Los Angeles
New Orleans
Saint Paul

February 26, 2019

VIA EMAIL

Bobbie Bayless
Bayless & Stokes
2931 Ferndale Street
Houston, Texas 77098

Re: Cause No. 412,249-401; *Estate of Nelva E. Brunsting, Deceased*; In the Probate Court Number Four of Harris County, Texas.

Dear Ms. Bayless:

In order to alleviate any privilege issues with respect to the documents responsive to Anita Brunsting's Subpoena for Documents and Tangible Things and potential testimony in Ms. Kunz-Freed's upcoming deposition, we are trying to obtain formal waivers of all claimed privileges from the parties. In that regards, please find the enclosed proposed waiver. After reviewing the document, please give us a call with any questions. We are hoping to have waivers in place for all interested parties prior to March 1, 2019.

Sincerely,



Cory S. Reed

Enclosure

ESTATE OF	§	IN PROBATE COURT
NELVA E. BRUNSTING,	§	NUMBER FOUR (4) OF
DECEASED	§	HARRIS COUNTY, TEXAS
<hr/>		
CARL HENRY BRUNSTING, et al	§	
V.	§	
ANITA KAY BRUNSTING, et al	§	

PRIVILEGE WAIVER AGREEMENT

I, Carl Brunsting, hereby voluntarily waive any claimed privileges (including but not limited to attorney-client and work-product) and consent to allow Candace L. Kunz-Freed, Albert E. Vacek Jr., and Vacek & Freed, PLLC the right to disclose any information and/or documents which might be properly withheld pursuant to the Texas Rules of Civil Procedure, Texas Rules of Evidence, and the Texas Disciplinary Rules of Professional Conduct.

As a heir to the Estate of Nelva E. Brunsting, I, fully and forever release, acquit, and discharge Candace L. Kunz-Freed, Vacek & Freed, PLLC, and Albert E. Vacek Jr. from any and all claims, actions, causes of action, demands, rights, damages, costs of whatsoever kind or nature related to any disclosure of confidential or privileged information pursuant to the attorney-client and work-product privilege between Candace L. Kunz-Freed, Albert E. Vacek Jr., Vacek & Freed, PLLC and the Estate of Nelva E. Brunsting.

I understand prior to the disclosure of any confidential or privileged information have the right to withdraw my agreement to this waiver and instruct my representative(s) to invoke the applicable privilege on my behalf.

Nothing in this agreement precludes any party's right to invoke the rights and remedies available under Texas Rule of Civil Procedure 193.3(d).

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Carl Brunsting and acknowledged that he is duly authorized and empowered to make this Privilege Waiver Agreement on behalf of himself, that he has read the foregoing Agreement, and fully understands it to be a complete release of all privileges as described therein, and that he has executed the same for the purposes expressed therein, in the capacities stated therein.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this _____ day of February, 2019.

AFFIANT: CARL BRUNSTING

THOMPSON COE

Thompson, Coe, Cousins & Irons, L.L.P.
Attorneys and Counselors

Cory S. Reed
Direct Dial: (713) 403-8213
creed@thompsoncoe.com

Austin
Dallas
Houston
Los Angeles
New Orleans
Saint Paul

February 26, 2019

VIA EMAIL

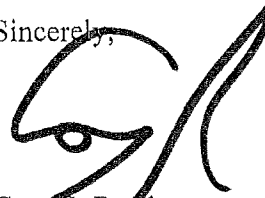
Stephen A. Mendel
Timothy J. Jadloski
The Mendel Law Firm, L.P.
1155 Dairy Ashford, Suite 104
Houston, Texas 77079

Re: Cause No. 412,249-401; *Estate of Nelva E. Brunsting, Deceased*; In the Probate Court Number Four of Harris County, Texas.

Dear Mr. Jadloski:

As you are aware, my clients Candace L. Kunz-Freed and Vacek & Freed, PLLC (collectively "V&F") previously represented Anita Brunsting as the Trustee to the Estate of Nelva E. Brunsting. In order to alleviate any privilege issues with respect to the documents responsive to the Subpoena for Documents and Tangible Things and potential testimony in Ms. Kunz-Freed's deposition, we will require a formal waiver of all claimed privileges from Ms. Brunsting. In that regards, please find the enclosed proposed waiver. After reviewing the document with your client, please give us a call to discuss. We are hoping to have waivers in place for all interested parties prior to March 1, 2019.

Sincerely,



Cory S. Reed

Enclosure

ESTATE OF	§	IN PROBATE COURT
NELVA E. BRUNSTING,	§	NUMBER FOUR (4) OF
DECEASED	§	HARRIS COUNTY, TEXAS

CARL HENRY BRUNSTING, et al	§
V.	§
ANITA KAY BRUNSTING, et al	§

PRIVILEGE WAIVER AGREEMENT

I, Anita Brunsting, Individually and as Trustee to the Estate of Nelva E. Brunsting hereby voluntarily waive any claimed privileges (including but not limited to attorney-client and work-product) and consent to allow Candace L. Kunz-Freed, Albert E. Vacek Jr., and Vacek & Freed, PLLC the right to disclose any information and/or documents which might be properly withheld pursuant to the Texas Rules of Civil Procedure, Texas Rules of Evidence, and the Texas Disciplinary Rules of Professional Conduct.

As a heir to the Estate of Nelva E. Brunsting, I, fully and forever release, acquit, and discharge Candace L. Kunz-Freed, Vacek & Freed, PLLC, and Albert E. Vacek Jr. from any and all claims, actions, causes of action, demands, rights, damages, costs of whatsoever kind or nature related to any disclosure of confidential or privileged information pursuant to the attorney-client and work-product privilege between Candace L. Kunz-Freed, Albert E. Vacek Jr., Vacek & Freed, PLLC and the Estate of Nelva E. Brunsting.

I understand prior to the disclosure of any confidential or privileged information have the right to withdraw my agreement to this waiver and instruct my representative(s) to invoke the applicable privilege on my behalf.

Nothing in this agreement precludes any party's right to invoke the rights and remedies available under Texas Rule of Civil Procedure 193.3(d).

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Anita Brunsting and acknowledged that she is duly authorized and empowered to make this Privilege Waiver Agreement on behalf of herself, that she has read the foregoing Agreement, and fully understands it to be a complete release of all privileges as described therein, and that she has executed the same for the purposes expressed therein, in the capacities stated therein.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this _____ day of February, 2019.

AFFIANT: ANITA BRUNSTING

THOMPSON COE

Thompson, Coe, Cousins & Irons, L.L.P.
Attorneys and Counselors

Cory S. Reed
Direct Dial: (713) 403-8213
creed@thompsoncoe.com

Austin
Dallas
Houston
Los Angeles
New Orleans
Saint Paul

February 26, 2019

VIA EMAIL

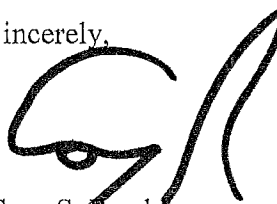
Candace Louise Curtis
218 Landana Street
American Canyon, California 94503

Re: Cause No. 412,249-401; *Estate of Nelva E. Brunsting, Deceased*; In the Probate Court Number Four of Harris County, Texas.

Dear Ms. Curtis:

In order to alleviate any privilege issues with respect to the documents responsive to Anita Brunsting's Subpoena for Documents and Tangible Things and potential testimony in Ms. Kunz-Freed's upcoming deposition, we are trying to obtain formal waivers of all claimed privileges from the parties. In that regards, please find the enclosed proposed waiver. After reviewing the document, please give us a call with any questions. We are hoping to have waivers in place for all interested parties prior to March 1, 2019.

Sincerely,



Cory S. Reed

Enclosure

ESTATE OF	§	IN PROBATE COURT
NELVA E. BRUNSTING,	§	NUMBER FOUR (4) OF
DECEASED	§	HARRIS COUNTY, TEXAS
<hr/>		
CARL HENRY BRUNSTING, et al	§	
V.	§	
ANITA KAY BRUNSTING, et al	§	

PRIVILEGE WAIVER AGREEMENT

I, Candace Louise Curtis, hereby voluntarily waive any claimed privileges (including but not limited to attorney-client and work-product) and consent to allow Candace L. Kunz-Freed, Albert E. Vacek Jr., and Vacek & Freed, PLLC the right to disclose any information and/or documents which might be properly withheld pursuant to the Texas Rules of Civil Procedure, Texas Rules of Evidence, and the Texas Disciplinary Rules of Professional Conduct.

As a heir to the Estate of Nelva E. Brunsting, I, fully and forever release, acquit, and discharge Candace L. Kunz-Freed, Vacek & Freed, PLLC, and Albert E. Vacek Jr. from any and all claims, actions, causes of action, demands, rights, damages, costs of whatsoever kind or nature related to any disclosure of confidential or privileged information pursuant to the attorney-client and work-product privilege between Candace L. Kunz-Freed, Albert E. Vacek Jr., Vacek & Freed, PLLC and the Estate of Nelva E. Brunsting.

I understand prior to the disclosure of any confidential or privileged information have the right to withdraw my agreement to this waiver and instruct my representative(s) to invoke the applicable privilege on my behalf.

THOMPSON COE

Thompson, Coe, Cousins & Irons, L.L.P.
Attorneys and Counselors

Cory S. Reed
Direct Dial: (713) 403-8213
creed@thompsoncoe.com

Austin
Dallas
Houston
Los Angeles
New Orleans
Saint Paul

February 26, 2019

VIA EMAIL

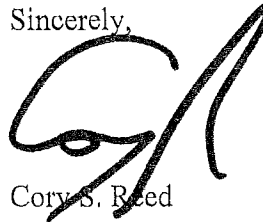
Neal E. Spielman
Griffin & Matthews
1155 Dairy Ashford, Suite 300
Houston, Texas 77079

Re: Cause No. 412,249-401; *Estate of Nelva E. Brunsting, Deceased*; In the Probate Court Number Four of Harris County, Texas.

Dear Mr. Spielman:

As you are aware, my clients Candace L. Kunz-Freed and Vacek & Freed, PLLC (collectively "V&F") previously represented Amy Brunsting as the Trustee to the Estate of Nelva E. Brunsting. In order to alleviate any privilege issues with respect to the documents responsive to the Subpoena for Documents and Tangible Things and potential testimony in Ms. Kunz-Freed's deposition, we will require a formal waiver of all claimed privileges from Ms. Brunsting. In that regards, please find the enclosed proposed waiver. After reviewing the document with your client, please give us a call to discuss. We are hoping to have waivers in place for all interested parties prior to March 1, 2019.

Sincerely,



Cory S. Reed

Enclosure

ESTATE OF	§	IN PROBATE COURT
NELVA E. BRUNSTING,	§	NUMBER FOUR (4) OF
DECEASED	§	HARRIS COUNTY, TEXAS
<hr/>		
CARL HENRY BRUNSTING, et al	§	
V.	§	
ANITA KAY BRUNSTING, et al	§	

PRIVILEGE WAIVER AGREEMENT

I, Amy Brunsting, Individually and as Trustee to the Estate of Nelva E. Brunsting hereby voluntarily waive any claimed privileges (including but not limited to attorney-client and work-product) and consent to allow Candace L. Kunz-Freed, Albert E. Vacek Jr., and Vacek & Freed, PLLC the right to disclose any information and/or documents which might be properly withheld pursuant to the Texas Rules of Civil Procedure, Texas Rules of Evidence, and the Texas Disciplinary Rules of Professional Conduct.

As a heir to the Estate of Nelva E. Brunsting, I, fully and forever release, acquit, and discharge Candace L. Kunz-Freed, Vacek & Freed, PLLC, and Albert E. Vacek Jr. from any and all claims, actions, causes of action, demands, rights, damages, costs of whatsoever kind or nature related to any disclosure of confidential or privileged information pursuant to the attorney-client and work-product privilege between Candace L. Kunz-Freed, Albert E. Vacek Jr., Vacek & Freed, PLLC and the Estate of Nelva E. Brunsting.

I understand prior to the disclosure of any confidential or privileged information have the right to withdraw my agreement to this waiver and instruct my representative(s) to invoke the applicable privilege on my behalf.

Nothing in this agreement precludes any party's right to invoke the rights and remedies available under Texas Rule of Civil Procedure 193.3(d).

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Amy Brunsting and acknowledged that she is duly authorized and empowered to make this Privilege Waiver Agreement on behalf of herself, that she has read the foregoing Agreement, and fully understands it to be a complete release of all privileges as described therein, and that she has executed the same for the purposes expressed therein, in the capacities stated therein.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, this _____ day of February, 2019.

AFFIANT: AMY BRUNSTING