

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	§	

**CANDACE L. KUNZ-FREED’S FIRST SUPPLEMENTAL RESPONSES TO ANITA
KAY BRUNSTING’S SUBPOENA DUCES TECUM**

TO: Defendant, Anita Kay Brunsting, by and through her counsel of record, Stephen A. Mendel and Timothy J. Jadloski, The Mendel Law Firm, L.P., 1155 Dairy Ashford, Suite 104, Houston, Texas 77079.

Pursuant to Rule 176 of the TEXAS RULES OF CIVIL PROCEDURE, Candace L. Kunz-Freed hereby submits her First Supplemental Responses to Defendant Anita Kay Brunsting’s Subpoena Duces Tecum as follows:

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

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**ATTORNEYS FOR NON-PARTY WITNESS
CANDACE KUNZ-FREED**

CERTIFICATE OF SERVICE

I hereby certify that pursuant to the Texas Rules of Civil Procedure, on this the 19th day of March, 2019, a true and correct copy of this document has been forwarded by certified mail, facsimile and/or e-filing to all counsel.

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Cory S. Reed

Cory S. Reed

RESPONSES TO SUBPOENA DUCES TECUM

REQUEST NO. 3: Any billing records, invoices, or other similar documents, regarding estate planning services provided to Nelva Brunsting by Candace Kunz-Freed and/or Vacek & Freed, PLLC.

RESPONSE: follows: Please see the attached documents and the documents previously produced.

REQUEST NO. 6: Candace Kunz-Freed's notary book for the years 2010-2011, but only those entries signed by Nelva Brunsting.

RESPONSE: Please see the attached documents.

REQUEST NO. 7: All powers of attorney, or other similar documents, prepared by Candace Kunz-Freed and/or Vacek & Freed, PLLC concerning Nelva Brunsting.

RESPONSE: Please see the attached documents and the documents previously produced.

REQUEST NO. 11: All written correspondence, including electronic correspondence, between Candace Kunz-Freed and/or Vacek & Freed, PLLC and Anita Brunsting and/or Amy Brunsting.

RESPONSE: Please see the attached documents and the documents previously produced.

REQUEST NO. 12: All written correspondence, including electronic correspondence, between Candace Kunz-Freed and/or Vacek & Freed, PLLC and any other person or entity regarding Nelva Brunsting, her estate, and/or the Brunsting family trust(s).

RESPONSE: Please see the attached documents and the documents previously produced.