

CANDACE L. CURTIS
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American Canyon CA 94503

February 21, 2020

Anita Brunsting
c/o Stephen Mendel
The Mendel Law Firm
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Houston, TX 77079
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Amy Brunsting
c/o Neal Spielman
Griffin & Matthews
1155 Dairy Ashford, Suite 300
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RE: DEMAND FOR SPECIFIC PERFORMANCE

Dear Anita and Amy,

As successor co-trustees of the Brunsting Family Trusts, a position you accepted willingly, you have failed to perform any of the duties required of that office, including but not limited to:

The duty of undivided loyalty
The duty of candor
The duty to disclose all transactions affecting the trusts or any beneficial interest therein
The duty to account
The duty to avoid unnecessary tax liabilities
The duty to avoid self dealing or comingling

I hereby demand that you perform the duties of successor co-trustees of the Brunsting Family Trusts by distributing the assets to the beneficiaries, per the attached spreadsheet, as follows:

\$106,000 to each beneficiary within 14 days of the date of this demand

\$140,000 to each beneficiary within 30 days of the date of this demand

These figures are based on the most recent accounting information and are subject to change based upon market values and cost of liquidation, if any.

Demand for Specific Performance
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Auction sale of the farm must be completed within 90 days from the date of this demand, with one exception. The farm will not be sold unless the bid is equal to or greater than the 2019 appraisal of \$2,125,000. Auction proceeds will be immediately paid directly to the individual beneficiary, minus their share of the fees.

The assets will be distributed in five equal portions, as our parents intended, and this demand is not negotiable.

If you perform your duties as set forth herein, we can talk about the excessive damages with Vacek & Freed.

Sincerely,

Your Big Sister Candy

Cc:
Carl Brunsting
bayless@baylessstokes.com

Carole Brunsting
cbrunsting@sbcglobal.net

ST	2019	Candy	Carole	Carl	Amy	Anita	
B of A	186,685.08	37,337.02	37,337.02	37,337.02	37,337.02	37,337.02	
B of A	168,617.36	33,723.47	33,723.47	33,723.47	33,723.47	33,723.47	
Deere	1,649.53	329.91	329.91	329.91	329.91	329.91	
XOM	61,106.18	12,221.24	12,221.24	12,221.24	12,221.24	12,221.24	
XOM	357.07	71.41	71.41	71.41	71.41	71.41	
Chev	5,832.28	1,166.46	1,166.46	1,166.46	1,166.46	1,166.46	
MetLife	424,247.50						
DT							
B of A	178,585.47	35,717.09	35,717.09	35,717.09	35,717.09	35,717.09	
EJ	389,742.04	77,948.41	77,948.41	77,948.41	77,948.41	77,948.41	
Chev	192,683.24	38,536.65	38,536.65	38,536.65	38,536.65	38,536.65	
XOM	52,419.63	10,483.93	10,483.93	10,483.93	10,483.93	10,483.93	
XOM	267.78	53.56	53.56	53.56	53.56	53.56	
Chev	751.72	150.34	150.34	150.34	150.34	150.34	
Chev	754.35	150.87	150.87	150.87	150.87	150.87	
	815,204.23						
	1,239,451.73	247,890.35	247,890.35	247,890.35	247,890.35	247,890.35	1,239,451.73
		-106,000.00	-106,000.00	-106,000.00	-106,000.00	-106,000.00	
		141,890.35	141,890.35	141,890.35	141,890.35	141,890.35	
		-140,000.00	-140,000.00	-140,000.00	-140,000.00	-140,000.00	
Farm	2,125,000.00	1,890.35	1,890.35	1,890.35	1,890.35	1,890.35	9,451.73
		425,000.00	425,000.00	425,000.00	425,000.00	425,000.00	
		671,000.00	671,000.00	671,000.00	671,000.00	671,000.00	

1. Keep accounts open to receive dividends until stocks liquidated
2. Transfer all funds to Survivors checking and write checks to each beneficiary for 106,000
3. Liquidate the stock and EJ into the checking accounts and then write checks to each beneficiary for \$140,000
4. Keep the \$9,451.73 for expenses in connection with selling the farm. It should be enough but if more is required the beneficiaries can each contribute 1/5