DCO issued June 10, 2021	Only Previous DCO issued February 20, 2015
8/6/2021 Rule 166a(i) Motions may not be	6/1/2015 Rule 166a(i) Motions may not be
filed before this date	filed before this date (6 yrs. 2 mo's)
	2021-07-19 Bill of Review Submission
	2015-03-12 Case 412249 Amy's Application to
	Be Appointed Executrix
	Amy filed an Application to be appointed
	representative of Nelva's Estate with her
	Response to Carl's Resignation and Ostrom's
Pending >>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	Application to appoint Candace.
	2015-06-26 Defendant Amy Brunsting and
	Defendant Anita Brunsting "No Evidence Motion for Partial Summary Judgment"
	<u>2015-07-08,</u> Case 412249-401 Carl Brunsting
	Motion for Partial Summary Judgment
	2015-07-13, Case 412249-401, Candace Curtis
	Response to No-evidence Motion with
	Demand to Produce Evidence PBT-2015-
	227757.
	2015-07-20 Case 412249-401 Drina Brunsting
	individual Motion For Protective Order – re
	Wiretap Recordings
	Hearing was had August 3, 2015 on Drina
	Brunstings individual Motion For Protective
	Order – re Wiretap Recordings. No finding of
	fact, conclusions of law and order after hearing
	has yet been issued.
	This motion remains pending after hearing.
	This charade was apparently intended to
	produce nothing which is exactly what it
	appears to have produced. Once having been
	used to dissolve the only docket control order
	ever entered in the case the "emergency" was
	no longer useful.
	2015-07-20 HC Dist Ct 164 Def estate planning
	attorneys file Response to Vacancy of Party
	with Motion to Abate & Sanctions. Case is now
	in Harris county probate Court No. 4 No.
	412249-403 with no plaintiff.
	2016-01-25 Candace Curtis' Motion for Partial
	Summary Judgment. Candace Curtis unwillingly

participated in the mock dispositive motions parade with her Motion for Partial Summary
Judgment.
2020-08-04 Drina's Reply to Defendants' Response to Motion for Partial Summary Judgment.
2019-06-2019 412249, 412249-401 Candace Curtis Petition for declaratory Judgement. RESPONSE TO THE FIDUCIARY'S APPLICATION FOR THE BENEFICIARY TO BE HELD IN CONTEMPT FOR SEEKING TO ENFORCE THE INJUNCTION COMMANDING THE TRUSTEE TO PERFORM A FIDUCIARY DUTY OWED TO THE BENEFICIARY WITH PETITION FOR PARTIAL SUMMARY OR DECLARATORY JUDGMENT
2015-05-27 Vacek & Freed Defendants Motion for Summary Judgment
Case 65561098 HC District Ct 164 the Vacek & Freed Defendants Motion for Traditional and No-Evidence Summary Judgment. Filed in District Court with no Plaintiff to answer as independent executor Carl Brunsting resigned Feb. 19, 2015 and no replacement has been appointed.
District Court Case dragged and dropped to create probate case No. 412249-403
2019-01-25 DEFENDANTS' MOTION TO DISMISS FOR WANT OF PROSECUTION
2019-07-07 Memorandum re Appointment of Administrator
2019-10-16 Kunz-Freed's M' Appoint Personal Rep.
2019-10-18 Kunz-Freed files NOH on Motion to Appoint
2019-11-04 Response to Mtn. to Appoint
2019-11-22 412249-404 Statutory Bill of Review. Jurisdiction is a fundamental question that must be settled at the onset. There is no estate, there is no probate, there is no

 ${\tt Page}2$ 

	executor, and there are no pleadings invoking the jurisdiction of a statutory probate court.
	Gov't Code 25.0021
	2020-07-02 Freed files NOH – re Mtn to
	Appoint Personal Rep or Admin.
	2020-08-04 Response to Freed's Motion to
	Appoint Personal Representative.
10/15/2021 PLEADINGS: All amendments	8/4/2015 PLEADINGS: All amendments and
and supplements must be filed by this date	supplements must be filed by this date
11/5/2021 Experts for parties seeking	7/1/2015 Experts for parties seeking
affirmative relief	affirmative relief
11/19/2021 All other experts	8/1/2015 All other experts
12/31/2021 Dispositive Motions or Pleas	8/3/2015 Dispositive Motions or Pleas subject
subject to interlocutory appeal must be heard	to interlocutory appeal must be heard by this
by this date	date
1/14/2022 Challenges to Expert Testimony	9/1/2015
02/07/2022 Summary Judgment motions not	
subject to an interlocutory appeal must be	
heard by this date	8/3/2015 Challenges to Expert Testimony
2/14/2022 Discovery Period Ends	8/4/2015 Discovery Period Ends
2/21/2022 by Noon JOINT PRE-TRIAL ORDER.	- / / /
Parties shall provide to the Court, by fax,	9/4/2015 by Noon JOINT PRE-TRIAL ORDER.
email, or delivery to our offices, a copy of the	Parties shall provide to the Court, by fax,
signed Agreed Joint Pretrial Order by this	email, or delivery to our offices, a copy of the
date. Parties shall bring the original Agreed	signed Agreed Joint Pretrial Order by this
Joint Pretrial Order to the Pretrial	date. Parties shall bring the original Agreed
Conference.	Joint Pretrial Order to the Pretrial Conference.
02/24/2022, at 10 a.m. PRETRIAL	0/44/2045
CONFERENCE.	9/11/2015
04/04/2022 at 9:00 a.m. TRIAL	9/14-18/2015

Vacek advertised his products as "asset protection" and claimed his products and services would protect you from "*people who want to take what you have*". Vacek also gave specific assurances that his products and service would avoid probate and guardianship.

## Who are these "people who want to take what you have"?

- 1. Family Trust Co-beneficiaries Anita Brunsting and Amy Brunsting
- 2. Vacek associate Candace Kunz-Freed, Texas State Bar Number: 24041282
- 3. Vacek associate Bernard Lyle Matthews III, Texas State Bar Number: 13187450
- 4. Attorney Bobbie G. Bayless, State Bar No. 01940600
- 5. Attorney Jason B. Ostrom, Texas Bar #2402771 0 Fed. Id. #33680
- 6. Attorney Stephen A. Mendel, Texas State Bar No. 13930650
- 7. Attorney Neal Spielman, Texas State Bar No. 00794678
- 8. Attorney Darlene Payne Smith , State Bar No. 18643525
- 9. Attorney Gregory Lester, State Bar No. 12235700
- 10. Attorney Jill Willard-Young, State Bar Card Number: 00797670
- 11. By and through: Harris County Texas et al.,
  - a. Clarinda Comstock Esq. Associate Judge (County employee/appointee) Texas Bar Card Number: 00790492
  - b. Tamorah Christine Butts, Former Judge Harris County Probate Court No. 4, Texas Bar Card Number: 24004222. Board Certified in Estate Planning and Probate Law in Texas.
  - c. Laura Beckman Hedge, Assistant County Attorney Texas State Bar No. 00790288, Federal Bar No. 23243

Why did Vacek associate Candace Kunz-Freed have Vacek's client, Nelva Brunsting, subjected to a <u>competency evaluation</u> if not to have her declared incompetent so the predators could loot the family trust using the Guardianship protection racket?

Why have the cestui que' of the Brunsting family trust had their property held hostage in Harris County Probate Court No. 4, for more than eight years without a single dispositive issue being ruled upon?

If this is not an estate planning attorney bait and switch fed money cow hostage / ransom scheme, what is it?