

TAB 15

NO. 412.248

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

INVENTORY, APPRAISEMENT AND LIST OF CLAIMS

Date of Death: April 1, 2009

The following is a full, true, and complete Inventory and Appraisement of all personal property and of all real property situated in the State of Texas, together with a List of Claims due and owing to this Estate as of the date of death, which have come to the possession or knowledge of the undersigned.

INVENTORY AND APPRAISEMENT

ASSETS	VALUE	ESTATE INTEREST
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- 1. **Real Estate:**
See List of Claims
- 2. **Stocks and Bonds**
See List of Claims
- 3. **Mortgages, Notes and Cash:**
See List of Claims
- 4. **Insurance Payable to Estate**
See List of Claims
- 5. **Jointly Owned Property**
See List of Claims

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 COUNTY CLERK
 HARRIS COUNTY, TEXAS

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LIST OF CLAIMS

1. Based upon the information currently available to the personal representative of the estate, it is not possible to determine with certainty what assets were in the estate at the Decedent's death. That determination will have to be made the subject of further judicial proceedings. After that judicial determination is made, to the extent it becomes necessary, this Inventory, Appraisalment and List of Claims will be amended to reflect the descriptions and values of assets later determined to have been estate assets at the time of Decedent's death.

2. The estate has asserted a claim against Candace L. Kunz-Freed and Vacek & Freed, PLLC f/k/a The Vacek Law Firm, PLLC relating to actions taken and omissions made in the course of their representation of decedent and his wife which may result in additional estate assets. That case is pending under Cause No. 2013-05455, styled *Carl Henry Brunsting, Independent Executor of the Estates of Elmer H. Brunsting and Nelva E. Brunsting v. Candace L. Kunz-Freed and Vacek & Freed, PLLC f/k/a The Vacek Law Firm, PLLC*, in the 164th Judicial District Court of Harris County, Texas.

3. The Brunsting Family Living Trust was signed by Decedent and his wife on October 10, 1996 and was restated on January 12, 2005 (the "Family Trust"). The Family Trust purported by its terms to provide for the creation of successor and/or subsequent trusts. The Family Trust also described other documents which, if created in compliance with the terms of the Family Trust, could impact the assets and status of the Family Trust. Attempts were made by various parties to change the terms and control of the Family Trust through later instruments which have been or will be challenged. The estate also asserts claims against Anita Brunsting and Amy Brunsting, the current purported trustees of the successor trusts or trusts arising from the Family Trust or documents

Candace L. Kunz-Freed



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allegedly created pursuant to the terms of the Family Trust. Those claims will be the subject of separate proceedings and may result in additional estate assets.

4. The estate also asserts a claim against Anita Brunsting, Amy Brunsting, and Carole Brunsting in their individual capacities for amounts paid and assets believed to also include, among other things, stocks and bonds which were removed from the Family Trust and/or the estate. This was accomplished either through the use of a power of attorney for Decedent's wife, through their position as trustees, through their position as joint signatories on accounts and safe deposit boxes, or because they otherwise had access to the assets. Those claims will also be the subject of a separate proceeding and may result in additional estate assets.

There are no known claims due or owing to the Estate other than those shown on the foregoing Inventory and Appraisalment.

The foregoing Inventory, Appraisalment and List of Claims should be approved and ordered entered of record.

Carl Henry Brunsting
CARL HENRY BRUNSTING,
Independent Executor of the Estate of
Elmer H. Brunsting

BAYLESS & STOKES

By: *Bobbie G. Bayless*
Dalia B. Stokes
Bobbie G. Bayless
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Houston, Texas 77098
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Attorneys for Independent Executor

Linda M. Hays



2022 JUN 20 10:53:50

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing instrument was forwarded to the following interested parties as specified below on the 26th day of March, 2013, as follows:

Maureen Kuzik McCutchen
Mills Shirley, LLP
2228 Mechanic, Suite 400
P.O. Box 1943
Galveston, Texas 77553-1943
Houston, Texas 77056
sent via Telecopier

Candace Louise Curtis
1215 Ulfian Way
Martinez, California 94553
sent via U.S. First Class Mail

Carole Ann Brunsting
5822 Jason St.
Houston, Texas 77074
sent via U.S. First Class Mail


BOBBIE G. BAYLESS



Shawn M. Teague



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THE STATE OF TEXAS §
 §
COUNTY OF HARRIS §

I, CARL HENRY BRUNSTING, having been duly sworn, hereby state on oath that the foregoing Inventory, Appraisalment and List of Claims is a true and complete statement of all the property and claims of the Estate that have come to my knowledge.

Carl Henry Brunsting
CARL HENRY BRUNSTING
*Independent Executor of the Estate of
Elmer H. Brunsting, Deceased*

SWORN TO and SUBSCRIBED BEFORE ME by the said CARL HENRY BRUNSTING,
on this 26th day of March, 2013, to certify which witness my hand and seal of office.



Shawn M. Teague
Notary Public in and for the
State of TEXAS
Printed Name: *Shawn M. Teague*
My Commission Expires: 4-3-2015





I, Teneshia Hudspeth, County Clerk of Harris County, Texas certify that these pages are a true and correct copy of the original record filed and recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office
This June 20, 2022

Teneshia Hudspeth, County Clerk
Harris County, Texas

Confidential information may have been redacted from the document in compliance with the Public Information Act.



PROBATE COURT 4

NO. 412.249

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

ORDER APPROVING INVENTORY,
APPRAISEMENT AND LIST OF CLAIMS

3930 (b)
EFF 9-1-83

The foregoing Inventory, Appraisement and List of Claims of the above Estate, having been filed and presented, and the Court, having considered and examined the same and being satisfied that it should be approved and there having been no objections made thereto, it is in all respects APPROVED and ORDERED entered of record.

SIGNED on this 4 day of April, 2013.

Clementine Bonin
JUDGE PRESIDING

APPROVED:

BAYLESS & STOKES

By: Bobbie G. Bayless
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Attorneys for Independent Executor

FILED
2013 APR -5 AM 10:01
St. J. Bonin
COUNTY CLERK
HARRIS COUNTY, TEXAS

APR 05 2013





I, Teneshia Hudspeth, County Clerk of Harris County, Texas certify that these pages are a true and correct copy of the original record filed and recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office
This June 20, 2022

Teneshia Hudspeth, County Clerk
Harris County, Texas

Confidential information may have been redacted from the document in compliance with the Public Information Act.

