

CAUSE NO. 067-248936-10

ODIS J. ADAIR, JR., *et al.* § IN THE DISTRICT COURT OF
Plaintiffs, §
v. § TARRANT COUNTY, TEXAS
TITAN OPERATING, LLC, and, §
THE CAFFEY GROUP, LLC, §
Defendants. § 67TH JUDICIAL DISTRICT

CAUSE NO. 067-248989-10

ALAN D. ALLMAN, *et al.* § IN THE DISTRICT COURT OF
Plaintiffs, §
v. § TARRANT COUNTY, TEXAS
TITAN OPERATING, LLC, and, §
THE CAFFEY GROUP, LLC, §
Defendants. § 67TH JUDICIAL DISTRICT

CAUSE NO. 067-248914-10

DAVID M. BARRON, *et al.* § IN THE DISTRICT COURT OF
Plaintiffs, §
v. § TARRANT COUNTY, TEXAS
TITAN OPERATING, LLC, and, §
THE CAFFEY GROUP, LLC, §
Defendants. § 67TH JUDICIAL DISTRICT

CAUSE NO. 067-248901-10

RICHARD A. BOWDOIN, *et al.* § IN THE DISTRICT COURT OF
Plaintiffs, §
v. § TARRANT COUNTY, TEXAS
TITAN OPERATING, LLC, and, §
THE CAFFEY GROUP, LLC, §
Defendants. § 67TH JUDICIAL DISTRICT

CAUSE NO. 067-248991-10

JERRY L. VAN CAMP, <i>et al.</i>	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
TITAN OPERATING, LLC, and,	§	
THE CAFFEY GROUP, LLC,	§	
Defendants.	§	67 TH JUDICIAL DISTRICT

CAUSE NO. 067-248937-10

TIMOTHY WOODHOUSE, <i>et al.</i>	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
TITAN OPERATING, LLC, and,	§	
THE CAFFEY GROUP, LLC,	§	
Defendants.	§	67 TH JUDICIAL DISTRICT

PLAINTIFFS' GLOBAL RESPONSES TO REQUESTS FOR ADMISSION

COME NOW all Plaintiffs and file this, their global responses to Defendants Titan and Caffey's Requests for Admission.

REQUEST FOR ADMISSION NO. 1:

Admit that you did not sign an oil and gas lease concerning your property with Titan or Caffey.

RESPONSE: Admitted.

REQUEST FOR ADMISSION NO. 2:

Admit that you did not sign a contractual agreement for the development of oil, gas and/or other minerals with or in favor of Titan or Caffey.

RESPONSE: Admitted.

REQUEST FOR ADMISSION NO. 3:

Admit that there is no contractual agreement between BC-MRC and Titan or Caffey concerning an oil and gas lease covering your property.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO. 4:

Admit that BC-MRC did not have authority to bind you to an oil and gas lease.

RESPONSE: Admitted.

REQUEST FOR ADMISSION NO. 5:

Admit that BC-MRC advised you that it was a neighborhood collaboration of several homeowners and that it was your individual responsibility to read any oil and gas lease and decide if the lease agreement was right for your needs.

RESPONSE: Denied as stated. Plaintiff admits that BC-MRC advised Plaintiff that it “is a [sic] association of individual mineral rights owners who have agreed to band together and collectively negotiate for the lease of their mineral rights.” Plaintiff is unaware that BC-MRC advised that it was Plaintiff’s individual responsibility to read any oil and gas lease and decide if the lease agreement was right for Plaintiff’s needs.

REQUEST FOR ADMISSION NO. 6:

Admit that BC-MRC advised you that you were not obligated to sign any oil and gas agreement that was recommended by BC-MRC.

RESPONSE: Admitted.

REQUEST FOR ADMISSION NO. 7:

Admit that BC-MRC advised you that it was merely providing property owners with a recommendation of which oil and gas company to sign with.

RESPONSE: Denied as stated. Plaintiff admits that BC-MRC advised Plaintiff that it “simply negotiated favorable terms for Plaintiff’s individual lease.” Plaintiff is unaware that BC-MRC advised that it was merely providing property owners with a recommendation of which oil and gas company to sign with.

Respectfully submitted,

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CERTIFICATE OF SERVICE

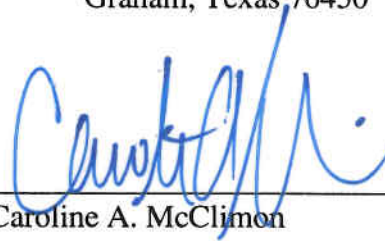
I hereby certify that a true and correct copy of the foregoing document was forwarded to all counsel of record, via *electronic mail* and/or *certified mail, return receipt requested* on this 2nd day of February, 2011.

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