

CAUSE NO. 067-248916-10

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

CAUSE NO. 067-248905-10

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

CAUSE NO. 067-248903-10

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

CAUSE NO. 067-248986-10

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

CAUSE NO. 067-248915-10

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

PLAINTIFFS' GLOBAL RESPONSES TO REQUESTS FOR ADMISSIONS

COME NOW all Plaintiffs and file this, their global responses to Defendants Titan and Caffey's Request For Admissions.

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 BAMCO and Titan or Caffey concerning an oil and gas lease covering your property.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO.4:

Admit that BAMCO did not have authority to bind you to an oil and gas lease.

RESPONSE: Admitted.

REQUEST FOR ADMISSION NO.5:

Admit that BAMCO 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 worded. Plaintiff admits that BAMCO advised Plaintiff that it was “a group of property owners and neighbors that have formed a cooperative association with the purpose of negotiating the best and most equitable mineral lease terms for our area.” Plaintiff is unaware that BAMCO 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 BAMCO advised you that you were not obligated to sign any oil and gas agreement that was recommended by BAMCO.

RESPONSE: Denied.

REQUEST FOR ADMISSION NO.7:

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

RESPONSE: Denied.

Respectfully submitted,

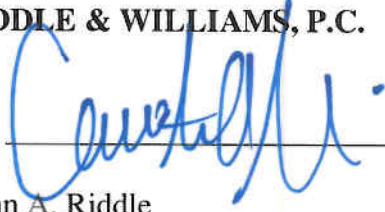
PETROFF & ASSOCIATES

Kip Petroff
State Bar No. 15851800
Carlos A. Fernandez
State Bar No. 24036555

3838 Oak Lawn Avenue, Suite 1124
Dallas, Texas 75219
Telephone: 214.526.5300
Facsimile: 214.526.5354

RIDDLE & WILLIAMS, P.C.

By: _____


Dean A. Riddle
State Bar No. 16888960
Chad E. Robinson
State Bar No. 24037373
Caroline A. McClimon
State Bar No. 24067752

3710 Rawlins Street
Suite 1400 - Regency Plaza
Dallas, Texas 75219
Telephone: 214.760.6766
Facsimile: 214.760.6765

MATHIS & DONHEISER, P.C.

Randal Mathis
State Bar No. 13194300
Mark Donheiser
State Bar No. 05974800

2575 Trammell Crow Center
2001 Ross Avenue
Dallas, Texas 75201
Telephone: 214.303.1919
Facsimile: 214.303.0399

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

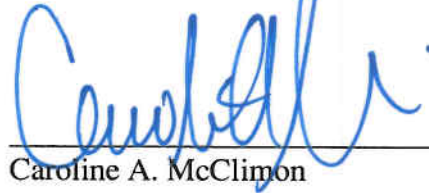
I hereby certify that a true and correct copy of the foregoing document was forwarded to all counsel of record, via *electronic mail* and/or *certified mail, return receipt requested* on this 11th day of February, 2011.

KELLY HART & HALLMAN LLP

Donald E. Herrmann
Richard T. McMillan II
Roel J. Fabela
201 Main Street, Suite 2500
Fort Worth, Texas 76102

TURNER & ALLEN, P.C.

Alfred G. Allen, III
P.O. Drawer 930
455 Elm Street, Suite 100
Graham, Texas 76450



Caroline A. McClimon