

**CAUSE NO. 067-245438-10**

DAVID WILLIAM AGEE, ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-244353-10**

RICARDO SALDANA AMALLA, ET AL	§	IN THE DISTRICT COURT
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246501-10**

LISA Y. ATTAWAY, ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246410-10**

ALVIN BARRON, ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246411-10**

LOWELL D. BAXTER ET AL           §           IN THE DISTRICT COURT OF  
   §  
 v.                                     §           TARRANT COUNTY, TEXAS  
   §  
 VANTAGE ENERGY, LLC, ET AL   §           67<sup>TH</sup> JUDICIAL DISTRICT

**CAUSE NO. 067-246412-10**

LESLIE ANN CARNAHAN, ET AL     §           IN THE DISTRICT COURT OF  
   §  
 v.                                     §           TARRANT COUNTY, TEXAS  
   §  
 VANTAGE ENERGY, LLC, ET AL   §           67<sup>TH</sup> JUDICIAL DISTRICT

**CAUSE NO. 067-24650810**

CHARLES D. CHILDRESS, ET AL     §           IN THE DISTRICT COURT OF  
   §  
 VS.                                   §           TARRANT COUNTY TEXAS  
   §  
 VANTAGE ENERGY, LLC. ET AL   §           67<sup>th</sup> DISTRICT COURT

**CAUSE NO. 67-245437-10**

REECE C. COPPENGER, ET AL       §           IN THE DISTRICT COURT OF  
   §  
 v.                                     §           TARRANT COUNTY, TEXAS  
   §  
 VANTAGE ENERGY, LLC, ET AL   §           67<sup>TH</sup> JUDICIAL DISTRICT

**CAUSE NO. 67-245439-10**

EVALYN P. ELLIS, ET AL           §           IN THE DISTRICT COURT OF  
   §  
 v.                                     §           TARRANT COUNTY, TEXAS  
   §  
 VANTAGE ENERGY, LLC, ET AL   §           67<sup>TH</sup> JUDICIAL DISTRICT

**CAUSE NO. 067-246143-10**

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STEVEN ALLEN EPSTEIN, ET AL	§	IN THE DISTRICT COURT OF
v.	§	
	§	TARRANT COUNTY, TEXAS
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246503-10**

DONALD E. HANNA, ET AL	§	IN THE DISTRICT COURT OF
v.	§	
	§	TARRANT COUNTY, TEXAS
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246506-10**

TERRI HI. HOUSE, ET AL	§	IN THE DISTRICT COURT OF
v.	§	
	§	TARRANT COUNTY, TEXAS
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246504-10**

DEAN HUBBARD ET AL	§	IN THE DISTRICT COURT OF
v.	§	
	§	TARRANT COUNTY, TEXAS
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 67-245436-10**

DEAN C. HUMANN ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-244347-10**

WINSTON CARDELL JOHNSON ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC ET AL	§	67 <sup>TH</sup> DISTRICT COURT

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**CAUSE NO. 067-245443-10**

ZIJAD KAPIC ET AL	§	IN THE DISTRICT COURT OF
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	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-245435-10**

SILAS KLAASSEN ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246502-10**

GRADY L. LEMONS ET AL                   §                   IN THE DISTRICT COURT OF  
    §  
    §  
 v.   §                   TARRANT COUNTY, TEXAS  
    §  
 VANTAGE ENERGY, LLC, ET AL       §                   67<sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-243797-10**

JOSEPH LEON MADDOX                   §                   IN THE DISTRICT COURT OF  
    §  
 v.   §                   TARRANT COUNTY, TEXAS  
    §  
 VANTAGE ENERGY LLC ET AL       §                   67<sup>TH</sup> DISTRICT COURT

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**CAUSE NO. 067-245444-10**

ROBERT A. POISSON, ET AL           §                   IN THE DISTRICT COURT OF  
    §  
 v.   §                   TARRANT COUNTY, TEXAS  
    §  
 VANTAGE ENERGY, LLC, ET AL       §                   67<sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246505-10**

GORDON A. ROESCH ET AL           §                   IN THE DISTRICT COURT OF  
    §  
 v.   §                   TARRANT COUNTY, TEXAS  
    §  
 VANTAGE ENERGY, LLC, ET AL       §                   67<sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-245438-10**

DAVID WILLIAM AGEE, ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

**CAUSE NO. 067-244353-10**

RICARDO SALDANA AMALLA, ET AL	§	IN THE DISTRICT COURT
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

**CAUSE NO. 067-246501-10**

LISA Y. ATTAWAY, ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

**CAUSE NO. 067-246410-10**

ALVIN BARRON, ET AL	§	IN THE DISTRICT COURT OF
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
VANTAGE ENERGY, LLC, ET AL	§	67 <sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-246507-10**

LUCIAN ANTHONY SIEPIELSKI, JR. § IN THE DISTRICT COURT OF  
 ET AL §  
 v. § TARRANT COUNTY, TEXAS  
 §  
 §  
 VANTAGE ENERGY, LLC, ET AL § 67<sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-245442-10**

LEONARD G. TAYLOR ET AL § IN THE DISTRICT COURT OF  
 v. § TARRANT COUNTY, TEXAS  
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 §  
 VANTAGE ENERGY, LLC, ET AL § 67<sup>TH</sup> JUDICIAL DISTRICT

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**CAUSE NO. 067-244352-10**

RAYMOND EARL WADSWORTH, ET AL § IN THE DISTRICT COURT  
 v. § TARRANT COUNTY, TEXAS  
 §  
 §  
 VANTAGE ENERGY, LLC, ET AL § 67<sup>TH</sup> JUDICIAL DISTRICT

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**DEFENDANTS VANTAGE AND CAFFEY'S FIRST SET OF INTEGRATED DISCOVERY TO PLAINTIFFS**

TO: Named Plaintiffs in the above styled actions, by and through their attorneys of record, Kip Petroff, Petroff & Associates, 3838 Oak Lawn Avenue, Suite 1124, Dallas, Texas 75219; Dean Riddle, Riddle & Williams, P.C., 3710 Rawlins Street, Suite 1400 – Regency Plaza, Dallas, Texas, 75219; and Randal Mathis, Mathis & Donheiser, 4600 Trammell Crow Center, 2001 Ross Avenue, Dallas, Texas 75201.

Pursuant to the Texas Rules of Civil Procedure, Defendants Vantage Energy, L.L.C. and The Caffey Group, L.L.C. serve their First Set of Integrated Discovery on Plaintiffs (“Defendants’ First Discovery Requests”). Plaintiffs are instructed to serve their responses and any responsive documents on Defendants’ counsel at the offices of Kelly Hart & Hallman LLP,

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201 Main Street, Suite 2500, Fort Worth, Texas 76102 within (30) days after receipt of these Requests.

**I.**  
**DEFINITIONS AND INSTRUCTIONS**

1. These Requests are addressed to the named Plaintiffs in the above styled actions. The terms "you," "your," or "Plaintiffs," as used in these Requests, refer to the named Plaintiffs listed in paragraph 3.0 of Plaintiffs' First Amended Original Petition.

2. The term "Vantage" as used herein, refers to Defendant Vantage Energy, L.L.C., its successors, predecessors, divisions, subsidiaries, attorneys, agents, officers, employees, representatives, or any other person acting in concert with it, on its behalf, or under its control, whether directly or indirectly.

3. The term "Caffey" as used herein, refers to Defendant The Caffey Group, L.L.C., its successors, predecessors, divisions, subsidiaries, attorneys, agents, officers, employees, representatives, or any other person acting in concert with it, on its behalf, or under its control, whether directly or indirectly.

4. The term "Vantage members" as used herein, refers to Defendants The Carlyle Group, LP, Riverstone Holdings, LLC, Quantum Energy Partners, LP, and Lime Rock Partners.

5. The term "Defendants" as used herein, refers to Vantage, Caffey, and the Vantage members.

6. "SWFA," as used herein, refers to the Southwest Fort Worth Alliance, its attorneys, participating members, representatives, agents, negotiators (lead or otherwise), committee members, or any other person acting in concert with it, on its behalf, or under its control, whether directly or indirectly, including specifically (but not limited to) Tolti Thomas, Alan Teichelman, and Chad Pierce.

7. "Property," as used herein, refers to the property specifically identified in paragraph 4.0 in Plaintiffs' First Amended Petition.

8. "Petition," as used herein, shall mean the Plaintiffs' First Amended Petition filed in the above styled actions on or about June 28, 2010 and any further subsequent supplement or amendment thereto, on file with the Court in this suit.

9. The term "document" is used with the fullest meaning recognized by the Texas Rules of Civil Procedure and Texas Rules of Evidence and refers to writings of every kind, whether originals, drafts, or non-identical copies, including without limitation: notes; data; lists; customer lists; itineraries; letters; correspondence; communications of any nature; drawings; designs; telegrams; manuals; books of accounts; purchase orders; order acknowledgements; invoices; checks; money orders; credit memoranda; debit memoranda; contracts; agreements; studies; tabulations; charts; graphs; photographs; photostats; mimeographs; typewriting; painting; graphic reproductions; film; handwriting; video tape recordings; audio tape recordings; analysis; books; articles; magazines; newspapers; booklets; circulars; bulletins; notices; instructions; computer disks; computer printouts or any form whatsoever; letters of introduction; letters of referral; summaries; questionnaires and surveys; memoranda; notebooks of any character; documents of any character; summaries or records of personal conversations; calendars; diaries; logs; routing slips or memoranda; reports; publications; internal and external emails; minutes or records of meetings; minutes of all other communications of any type, including inter- and intra-office communications; transcripts of oral testimony or statements; affidavits; reports and/or summaries of investigations; agreements and contracts, including all modifications and/or revisions thereof; working papers; reports and/or summaries of negotiations; court papers; brochures; pamphlets; press releases; drafts of and revisions of drafts of translations of any document; records and dictation belts; and, all tangible items. The term

specifically includes all forms of electronic communications. Any document with any marks on any sheet or side thereof, including by way of illustration only and not by way of limitation, initials, stamped indicia, any comment or any notation of any character and not a part of the original text, or any reproduction thereof, is to be considered a separate document for purposes of this request. If two or more identical duplicate copies of a document exist, the most legible copy should be produced for the purposes of this request.

10. "Supporting," "relating to" and/or "regarding" means relating to, evidencing, or regarding in any way, and includes not only the subject of the immediate Request, but also all documents that memorialize, describe, substantiate, support, reflect or bear upon, either directly or indirectly, any meeting, conference, conversation or communication, whether oral or written, regarding the subject of the immediate Request.

11. The terms "communication(s)," "communicate," "comment," or "correspondence" shall mean and include all discussions, conversations, interviews, negotiations, cablegrams, mailgrams, telegrams, telexes, cables, electronic mail, text messages, multimedia messages, or other forms of written or verbal interchange, however transmitted, including reports, notes, memoranda, lists, agenda, and other documents and records of communications, and when used shall require a statement of the name of the individual who made the communication, the person(s) to whom he made it, the date it was made, the form in which it was made, and whether or not it was recorded.

12. The terms "person" or "entity" mean and include any individual, governmental entity or agency, proprietorship, partnership, corporation, any other business entity, and all other forms of organization or association. When asked to identify a person or entity, you are instructed to give the name and home or business address and phone number of that person or entity.

13. The conjunction "or," as used in these Requests, does not limit any part of said request but, whenever applicable, should be given the same meaning as the word "and." For purposes of these Requests, the singular includes the plural and the plural includes the singular. "Any" includes the word "all," and "all" includes the word "any."

14. These Requests require you to respond by providing all information which is within your actual or constructive knowledge, or that of any agent, employee or other person acting or purporting to act on your behalf.

15. You must specifically admit or deny each of the following requests for admission or explain in detail the reasons why you cannot truthfully admit or deny a matter. Each of the matters will be deemed admitted by you without the necessity of a court order unless, within thirty (30) days after service of this request you make and serve a written response to these matters as required by Texas Civil Procedure Rule 198.

16. You must also answer each of the following interrogatories separately and fully, in writing and under oath, unless it is objected to, in which event the reasons for objection shall be stated in lieu of an answer. If you believe you are unable to answer any interrogatory fully and completely after exercising due diligence to do so, please answer the interrogatory as fully and completely as you can and explain why you are unable to answer the remainder of the interrogatory, including the basis for your inability to answer, and designate with particularity the discovery which you claim must be completed before you can answer.

17. These Requests are continuing in nature and require supplemental answers. In the event that Plaintiff, or any person acting on her behalf, becomes aware of additional material that is responsive to any of the following Requests at any time after providing her initial answers, Plaintiff is required to furnish such information to counsel for Defendants reasonably promptly.

Failure to do so may lead to a motion to continuance in order to investigate newly discovered material or a motion to exclude such information at trial of this matter.

18. Unless otherwise specified in any Request, or unless the context suggests otherwise, the time period covered by these Requests is from January 1, 2007 until the time of trial in this matter, which time period may be referred to herein as "the relevant time period."

**II,**  
**ADMISSIONS**

**REQUEST FOR ADMISSION NO. 1:**

Admit that you did not sign an oil and gas lease concerning the Property with Vantage or Caffey.

**RESPONSE:****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 Vantage or Caffey.

**RESPONSE:****REQUEST FOR ADMISSION NO. 3:**

Admit that SFWA 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:****REQUEST FOR ADMISSION NO. 4:**

Admit that you were contacted by Dean Riddle and/or Riddle & Williams, P.C. regarding and/or soliciting your participation in this lawsuit as plaintiff.

**RESPONSE:****REQUEST FOR ADMISSION NO. 5:**

Admit that you were contacted by Kip Petroff and/or Petroff & Associates regarding and/or soliciting your participation in this lawsuit as plaintiff.

**REQUEST FOR ADMISSION NO. 6:**

Admit that you were contacted by Randal Mathis and/or Mathis & Donheiser regarding and/or soliciting your participation in this lawsuit as plaintiff.

**RESPONSE:**

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**III.**  
**INTERROGATORIES**

**INTERROGATORY NO. 1:**

If your response to Request for Admission Nos. 1-2 is anything other than an unqualified admission, please explain in reasonable detail who you signed an oil and gas lease and/or contractual agreement with, when, the circumstances surrounding such execution, the benefits you are entitled to receive under such agreement, and state all facts upon which you rely to support such beliefs.

**RESPONSE:****INTERROGATORY NO. 2:**

If your response to Request for Admission No. 3 is anything other than an unqualified admission, please explain in reasonable detail what representations, if any, SFWA made to the contrary, and state all facts upon which you rely to support your belief to the contrary.

**RESPONSE:****INTERROGATORY NO. 3:**

With respect to your contention in the Petition that "Plaintiffs were notified of the agreement with SFWA and Vantage/Caffey, have accepted the terms that were offered, and have complied with every term of the contract":

1. State when you were notified of the agreement with SFWA and Vantage/Caffey.
2. Identify all persons who notified you of the alleged agreement with SFWA and Vantage/Caffey.
3. Describe how you "accepted the terms" that were offered.
4. Describe in detail the terms that you allegedly accepted.
5. Describe how you complied with every term of the alleged contract.

**RESPONSE:****INTERROGATORY NO. 4:**

Identify all persons or entities from whom you received offers to lease the Property for the production of oil, gas and other minerals.

**RESPONSE:**

**INTERROGATORY NO. 5:**

With respect to your contention in the Petition that Defendants "made representations to the Plaintiffs which they knew were false":

1. Identify all persons who allegedly made such false representations.
2. Describe in detail each and every representation made by those persons identified that you contend was false.
3. Identify all persons with knowledge of the facts supporting these allegations.

**RESPONSE****INTERROGATORY NO. 6:**

With respect to your contention in the Petition that "Defendants Vantage/Caffey agreed to provide goods and services":

1. Identify all the goods and services that Vantage or Caffey allegedly agreed to provide.
2. State when those goods and services were provided or scheduled to be provided to Plaintiffs.
3. Identify all persons with knowledge of the facts supporting these allegations.

**RESPONSE:****INTERROGATORY NO. 7:**

With respect to your contention in the Petition that "[e]ach of the Plaintiffs sought to acquire some or all of the services that Vantage/Caffey were to provide"

1. Identify all the goods and services that Plaintiffs sought from Vantage or Caffey.
2. Identify how you were to purchase such goods and services from Vantage or Caffey.
3. Identify all persons with knowledge of the facts supporting these allegations.

**RESPONSE:****INTERROGATORY NO. 8:**

With respect to your allegation in the Petition that Vantage is nothing more than the alter ego of the Vantage members: identify specific facts supporting this allegation and all persons with knowledge of such facts.

**RESPONSE:**

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**INTERROGATORY NO. 9:**

With respect to your allegation in the Petition that the Vantage members were each aware of the alleged contractual agreement between the Plaintiffs and Vantage/Caffey: identify specific facts supporting this allegation and all persons with knowledge of such facts.

**RESPONSE:****INTERROGATORY NO. 10:**

Identify specific facts that demonstrate that the Vantage members used Vantage for the purpose of perpetrating a fraud, and did perpetrate an actual fraud on Plaintiffs for the direct personal benefit of the Vantage members. Also, identify all persons with knowledge of such facts.

**RESPONSE:****INTERROGATORY NO. 11:**

Do you contend that that you were the beneficiary of the alleged agreement between SWFA and Vantage or Caffey? If so:

1. Identify the terms of the alleged agreement between SWFA and Vantage or Caffey.
2. Identify all persons who notified you of the alleged agreement with SFWA and Vantage or Caffey.
3. Describe how you are a beneficiary of the alleged agreement between SWFA and Vantage or Caffey.

**RESPONSE:**

IV.  
**REQUEST FOR PRODUCTION**

Unless otherwise specified, produce the following documents and tangible things from January 1, 2007 to the present:

**REQUEST FOR PRODUCTION NO. 1:**

If your response to Request for Admission Nos. 1-2 is anything other than an unqualified admission, please produce all documents supporting or related to your denial of the Request for Admission.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2:**

If your response to Request for Admission Nos. 3 is anything other than an unqualified admission, please produce all documents supporting or related to your denial of the Request for Admission.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3:**

A copy of any written agreement entered between you and Vantage or Caffey including any alleged agreement for or concerning the development of oil, gas and other minerals on the Property.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 4:**

All written memoranda, notes, and/or other documents reflecting or evidencing any agreement between you and Vantage or Caffey including any alleged agreement for or concerning the development of oil, gas and other minerals on the Property.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 5:**

A copy of any agreement entered into, if any, and/or any potential or possible agreements by or between you and SFWA.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 6:**

All written memoranda, notes, and/or other documents reflecting or evidencing any agreement between you and any person or entity other than Defendants (including specifically any other oil and gas companies and/or SFWA), including any alleged, potential or possible agreements for or concerning the development of oil, gas and other minerals on the Property.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 7:**

All communications, correspondence, e-mails, memoranda or notes showing or reflecting any communications or conversations between you and Vantage or Caffey, including any regarding an alleged contractual agreement for the development of oil, gas and other minerals between you and Vantage or Caffey.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 8:**

All documents reflecting or concerning negotiations between Vantage or Caffey and you regarding any alleged contractual agreement for the development of oil, gas and other minerals between you and Vantage or Caffey

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 9:**

All communications, correspondence, e-mails, memoranda or notes showing or reflecting any communications or conversations between you and any other oil and gas company.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 10:**

All communications, correspondence, e-mails, mcmoranda or notes showing or reflecting any communications or conversations between you and SFWA.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 11:**

All documents, including presentations, invitations, handouts, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video recordings that you received and/or were given by SFWA.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 12:**

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All documents reflecting or containing any communications between you and any person or entity other than Defendants (including but not limited to any other oil and gas companies and/or SFWA), relating to any offers you received to lease the Property for the production of oil, gas and other minerals.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 13:**

All diaries, journals, day-timers, or calendars (including any that are on hard copy or electronically stored), reflecting any meetings, communications, correspondence or conversations between you and any of the Defendants.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 14:**

All diaries, journals, day-timers, or calendars (including any that are on hard copy or electronically stored), reflecting any meetings, communications, correspondence or conversations between you and SFWA.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 15:**

All documents reflecting communications with your bank and/or any mortgage company holding a lien on the Property seeking permission or consent to enter into an oil and gas lease concerning or related to the Property.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 16:**

A copy of any documents submitted or sent by you to Vantage or Caffey and/or received by you from Vantage or Caffey

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 17:**

All transcripts, minutes or recordings, including audio or video recordings, of any kind involving Vantage or Caffey.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 18:**

All transcripts, minutes or recordings, including audio or video recordings, of any kind involving SFWA.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 19:**

All documents, including presentations, handouts, invitations, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video recordings that you reviewed, received and/or were given at any SFWA and/or other homeowner's meeting, including specifically any documents created or provided by Kip Petroff, Dean Riddle, Randal Mathis, or any person from the offices of Petroff & Associates, Riddle & Williams, P.C., or Mathis & Donheiser.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 20:**

A copy of any documents that you were shown, received and/or were given at any SFWA and/or other homeowner's meeting that were referred to as "secret documents" by Kip Petroff, Dean Riddle, Randal Mathis, or any person from the offices of Petroff & Associates, Riddle & Williams, P.C., or Mathis & Donheiser.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 21:**

All documents relating to your contention that Defendants "made representations to the Plaintiff which they knew were false."

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 22:**

All documents relating to your contention that "Defendants Vantage/Caffey agreed to provide goods and services" to Plaintiffs.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 23:**

All documents relating to your contention that the various goods and services that Vantage or Caffey allegedly agreed to provide "were bargained for and agreed to"

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 24:**

All documents relating to your contention that Vantage is the alter ego of the Vantage members.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 25:**

All documents relating to your contention that the Vantage members caused Vantage to commit an actual fraud for direct personal benefit of the Vantage members.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 26:**

If you contend that you are a beneficiary to an alleged agreement between SWFA and Vantage or Caffey, please provide all documents supporting this contention.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 27:**

A copy of your engagement letter and fee agreement with Petroff & Associates, Riddle & Williams, P.C., and/or Mathis & Donheiser.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 28:**

All documents, including billing statements or invoices, relating to or supporting your claim for attorneys' fees.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 29:**

All documents, including working papers, notes, calculations, diagrams, photographs, models, exhibits, reports and factual observations, prepared or reviewed by any expert designated by you, who will testify at trial.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 30:**

All documents prepared by or for a consulting expert whose mental impressions or opinions have been reviewed by a testifying expert.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 31:**

All treatises, rules, regulations, guidelines, statutes, policies, procedures, and any other materials considered in forming an opinion by any expert who will testify at trial.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 32:**

All demonstrative evidence and/or exhibits you intend to use at trial.

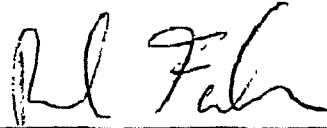
**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 33:**

All documents relevant to or supporting your computation of damages.

**RESPONSE:**

Respectfully submitted,




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Donald E. Herrmann  
 State Bar No. 09541300  
 Richard T. McMillan II  
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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 *certified mail, return receipt requested*, on this 30<sup>th</sup> day of July, 2010.

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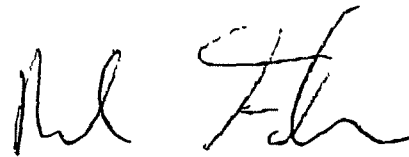
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