

EXHIBIT A

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

Pursuant to the Texas Rules of Civil Procedure, Defendants Titan Operating, L.L.C. and The Caffey Group, L.L.C., collectively ("Defendants") serve their First Set of Integrated Discovery on Plaintiffs ("Defendants' First Discovery Requests"). Each individual Plaintiff is instructed to serve his or her response and any responsive documents on Defendants' counsel at the offices of Kelly Hart & Hallman LLP, 201 Main Street, Suite 2500, Fort Worth, Texas 76102 within (30) days after receipt of service of Defendants' Answer, Request for Disclosures, and Request for Integrated Discovery (hereinafter "Defendants' Answer").

I. DEFINITIONS

1. These Requests are addressed to each of the named Plaintiffs in the above styled actions. The terms "you," "your," or "Plaintiffs," as used in these Requests, refer to Plaintiff Property Owners identified in Paragraph 3 of Plaintiffs' Original Petition.
2. The term "Titan" as used herein, refers to Defendant Titan Operating, 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 "Defendants" as used herein, refers to Titan and Caffey.

5. The term "BC-MRC" as used herein, refers to Bedford-Colleyville Mineral Rights Coalition, 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.

6. The term "Plaintiffs' Petition" or "Petition" as used herein, shall mean Plaintiffs' Original Petition filed in this case.

7. The term "document" or "documents" 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 or magnetic data and electronic communication (this includes deleted emails, text messages, and phone messages). 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.

8. "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.

9. The terms "communication(s)," "communicate," "comment," or "correspondence" shall mean and include all discussions, conversations, interviews, negotiations, cablegrams, mailgrams, telegrams, telexes, cables, electronic mail (this includes deleted emails), text messages (this includes deleted 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. The term "communication(s)," "communicate," "comment," or "correspondence" also includes any deleted communications such as emails, text messages, and phone messages.

10. 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.

11. 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."

12. 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.

II. **INSTRUCTIONS**

A. Requests for Admissions.

1. Pursuant to Texas Rule of Civil Procedure 198.2, you are instructed that when good faith requires you to qualify your answer and/or deny only a part of the matter of which an admission is requested, you shall specify the portion which is true and qualify and/or deny the remainder.

2. Pursuant to Texas Rule of Civil Procedure 198.2(b), you are instructed not to provide lack of information or knowledge as a reason for failing to admit or deny unless you have made a reasonable inquiry and the information known or easily obtainable by you is insufficient to enable you to admit or deny a request.

3. 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 Defendants' Answer you make and serve a written response to these matters as required by Texas Civil Procedure Rule 198.

4. Each of your answers shall set out the request for admission in full, and your answer shall follow and be designated as "RESPONSE".

B. Interrogatories.

1. The interrogatories are to be considered as continuing to the extent consistent with the Texas Rules of Civil Procedure, and you are requested to provide by way of supplementary answers thereto, such additional information as you or any other person acting on your behalf may hereafter obtain that will augment or otherwise modify your answers.

2. In answering interrogatories, furnish all information available to you, including information in the possession of your attorney or his or her investigators, and all persons acting on your behalf and not merely such information known of your own personal knowledge. If you cannot answer the interrogatories in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying your inability to answer the remainder, stating any, and all efforts to obtain the information necessary to answer in full, and stating whatever information or knowledge you have concerning the unanswered portions.

3. If in response to an interrogatory you answer that the information may be derived or ascertained from business records, then your answer shall include a detailed identification of the records (including type of document, Bates labels or Bates numbers, name and page numbers) and their precise location.

4. If any information requested by an interrogatory is withheld on the basis of a claim of privilege or discovery exemption, set forth: the nature of the privilege/exemption; the

basis for its assertion as to each specific piece of information withheld; the nature of the information withheld; and all recipients of such information.

5. Each of your answers shall set out the interrogatory in full, and your answer shall follow and be designated as "RESPONSE".

C. Requests for Production.

1. In responding to requests for production, Texas Rule of Civil Procedure 196.2(b) provides that you must state that:

- (a) production, inspection, or other requested action will be permitted as requested;
- (b) the requested items are being served on the requesting party with the response;
- (c) production, inspection, or other requested action will take place at a specified time and place (if the responding party is objecting to the time and place of production); or
- (d) no items have been identified—after a diligent search—that are responsive to the request.

2. Each of your responses shall set out the request in full, and your response shall follow and be designated as "RESPONSE". See TEX. R. CIV. P. 193.1.

3. If any document falling within any description contained in the following list is withheld under claim of privilege, you shall serve upon the undersigned attorney, in conjunction with their response, a written statement that: (1) information or material responsive to the request has been withheld; (2) the request to which the information or material relates; and (3) the privilege or privileges asserted. See TEX. R. CIV. P. 193.3(a). You shall also provide a

privilege log pursuant to TEX. R. CIV. P. 193.3(b) within fifteen (15) days after serving your discovery responses.

4. All responsive documents or tangible things should be produced as they are kept in the usual course of business or should be organized and labeled to correspond with the categories in the following requests. *See* TEX. R. CIV. P. 193.3.

5. The requests are intended to cover any and all documents in your possession subject to your custody or control, either directly or through your agents, representatives or partners. Any and all documents in your possession, custody or control includes constructive possession whereby you have the right to compel production of the document from a third party, including any agent, employer, partner, attorney, accountant or other representative.

6. For a document that no longer exists or that cannot be located, identify the document, state how and when it passed out of existence, or when it could no longer be located, and the reasons for the disappearance. Also, identify each person having knowledge about the disposition or loss of the document, and identify any other document evidencing the lost document's existence or any facts about the lost document.

7. 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."

III.
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:

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:

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:

REQUEST FOR ADMISSION NO. 4:

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

RESPONSE:

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.

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:

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:

**IV.
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 terms of such an agreement, state all facts upon which you rely to support such beliefs, and identify the relevant parties who have sufficient knowledge of such facts.

RESPONSE:

INTERROGATORY NO. 2:

If your response to Request for Admission Nos. 3 is anything other than an unqualified admission, please explain in reasonable detail who BC-MRC signed an oil and gas lease and/or contractual agreement with, when, the circumstances surrounding such execution, the terms of such an agreement, state all facts upon which you rely to support such beliefs, and identify the relevant parties who have sufficient knowledge of such facts.

RESPONSE:

INTERROGATORY NO. 3:

If your response to Request for Admission Nos. 4 is anything other than an unqualified admission, please explain in reasonable detail what authority BC-MRC had to bind you to oil and gas leases, the extent of such authority, when that authority was given, state all facts upon which you rely to support such beliefs, and identify the relevant parties who have sufficient knowledge of such facts.

RESPONSE

INTERROGATORY NO. 4:

If your response to Request for Admission No. 5-7 is anything other than an unqualified admission, please explain in reasonable detail what representations, if any, BC-MRC made to the contrary, and state all facts upon which you rely to support your beliefs.

RESPONSE:

INTERROGATORY NO. 5:

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

RESPONSE:

INTERROGATORY NO. 6:

With respect to your fraudulent misrepresentation claim as alleged in your Petition:

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, including when it was made;
3. Describe in detail how you relied on the alleged false representations; and
4. Identify all persons with knowledge of the facts supporting these allegations.

RESPONSE

INTERROGATORY NO. 7:

With respect to your third party beneficiary claim as alleged in your Petition:

1. Identify the terms of the alleged agreement between BC-MRC and Titan or Caffey;
2. Identify all persons who notified you of the alleged agreement between BC-MRC and Titan or Caffey;
3. State whether BC-MRC had the authority to bind you to any such alleged agreement between BC-MRC and Titan or Caffey; and
4. Describe how you are a beneficiary of the alleged agreement between BC-MRC and Titan or Caffey.

RESPONSE:

INTERROGATORY NO. 8:

Identify the damages you are seeking in regards to each of the claims you are asserting against Defendants in your Petition. In your answer:

1. Describe each type of damage you are seeking (e.g., benefit-of-the bargain, out-of-pocket, consequential, reliance etc...);
2. State the amount you believe you are entitled for each type of damage;
3. Describe, in reasonable detail, how you calculated the respective amounts;
4. Identify all facts upon which you rely on to support such beliefs; and
5. Identify all documents that support your respective damage model.

RESPONSE:

INTERROGATORY NO. 9:

To the extent authorized by Rule 192.3, identify by name, address, and telephone number each and every person you expect to call to testify at the trial of this case.

RESPONSE:

V.

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. 1-7 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:

Provide any and all documents supporting your answers to the above Interrogatories.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3:

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

RESPONSE:

REQUEST FOR PRODUCTION NO. 4:

All written memoranda, notes, and/or other documents reflecting or evidencing any agreement between you and Titan or Caffey including any alleged agreement for or concerning the development of oil, gas and other minerals concerning your 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 BC-MRC.

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 any alleged, potential or possible agreements for or concerning the development of oil, gas and other minerals concerning your 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 Titan or Caffey, including any regarding an alleged contractual agreement for the development of oil, gas and other minerals between you and Titan or Caffey.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8:

All documents reflecting or concerning negotiations between Titan or Caffey and you regarding any alleged contractual agreement for the development of oil, gas and other minerals between you and Titan 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, memoranda or notes showing or reflecting any communications or conversations between you and BC-MRC.

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 were received,

reviewed, distributed, created, and/or prepared by BC-MRC that are in your possession, custody or control.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12:

All documents, including presentations, invitations, handouts, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video recordings that that Plaintiffs' received from or provided to BC-MRC.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13:

All documents reflecting or containing any communications between you and any person or entity other than Defendants relating to any offers you received to lease your property for the production of oil, gas and other minerals.

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 any of the Defendants.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15:

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 BC-MRC.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16:

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

RESPONSE:

REQUEST FOR PRODUCTION NO. 17:

All transcripts, minutes or recordings, including audio or video recordings, of any kind involving Titan or Caffey that are in your possession, custody or control.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18:

All transcripts, minutes or recordings, including audio or video recordings, of any kind involving BC-MRC that are in your possession, custody or control.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19:

All documents supporting your contention that you are a third party intended beneficiary to an alleged agreement between BC-MRC and Titan or Caffey.

RESPONSE:

REQUEST FOR PRODUCTION NO. 20:

All documents reflecting the organizational leadership of BC-MRC.

RESPONSE:

REQUEST FOR PRODUCTION NO. 21:

All documents demonstrating that BC-MRC had the authority to bind you to any alleged agreement between BC-MRC and Titan or Caffey.

RESPONSE:

REQUEST FOR PRODUCTION NO. 22:

All documents demonstrating that BC-MRC had the authority to negotiate on your behalf.

RESPONSE:

REQUEST FOR PRODUCTION NO. 23:

All documents supporting your contention that Defendants made false or fraudulent representations to you.

RESPONSE:

REQUEST FOR PRODUCTION NO. 24:

All documents supporting your contention that you detrimentally relied on Defendants alleged false or fraudulent representations.

RESPONSE:

REQUEST FOR PRODUCTION NO. 25:

All documents supporting the damages you are seeking in this case.

RESPONSE: