

**THE STATE OF TEXAS
SUBPOENA DUCES TECUM**

TO: Southwest Fort Worth Alliance
Custodian of Record
5341 Wooten Drive
Fort Worth, Texas 76133

YOU ARE COMMANDED, at the instance of Vantage Energy, L.L.C. and The Caffey Group, L.L.C., Defendants in Cause No. 067-245438-10; *David Agee v. Vantage Energy, LLC et al*; Cause No. 067-244353-10, *Ricardo Amalla et al v. Vantage Energy, LLC et al*; Cause No. 067-246501-10; *Lisa Attaway et al v. Vantage Energy, LLC et al*; Cause No. 067-246410-10; *Alvin Barron v. Vantage Energy, LLC et al*; Cause No. 067-246411-10; *Lowell Baxter et al v. Vantage Energy, LLC et al*; Cause No. 067-246412-10; *Leslie Carnahan et al v. Vantage Energy, LLC et al*; Cause No. 067-246508-10; *Charles Childress et al v. Vantage Energy, LLC et al*; Cause No. 067-245437-10; *Renee Coppenger et al v. Vantage Energy, LLC et al*; Cause No. 067-245439-10; *Evalyn Ellis v. Vantage Energy, LLC et al*; Cause No. 067-246143-10; *Steven Epstein et al v. Vantage energy, LLC et al*; Cause No. 067-246503-10; *Donald Hanna et al v. Vantage Energy, LLC et al*; Cause No. 067-246506-10; *Terri House et al v. Vantage Energy LLC et al*; Cause No. 067-246504-10; *Dean Hubbard et al v. Vantage Energy, LLC et al*; Cause No. 067-245436-10; *Dean Hummann et al v. Vantage Energy, LLC et al*; Cause No. 067-244347-10; *Winston Johnson et al v. Vantage energy, LLC et al*; Cause No. 067-245443-10; *Zijad Kapic et al v. Vantage Energy, LLC et al*; Cause No. 067-245435-10; *Silas Klaassen et al v. Vantage Energy, LLC et al*; Cause No. 067-246502-10; *Grady Lemons et al v. Vantage Energy, LLC et al*; Cause No. 067-243797-10; *Joseph Maddox et al v. Vantage Energy, LLC et al*; Cause No. 067-245444-10; *Robert Poisson et al v. Vantage Energy, LLC et al*; Cause No. 067-246505-10; *Gordon Roesch et al v. Vantage Energy, LLC et al*; Cause No. 067-246507-10; *Luclan Steptelski et al v. Vantage Energy, LLC et al*; Cause No. 067-245442-10; *Leonard Taylor et al v. Vantage Energy, LLC et al*; Cause No. 067-244352-10; *Raymond Wadsworth et al v. Vantage Energy, LLC et al*, pending in the 67th District Court, Tarrant County, Texas, to produce and permit inspection and copying of the following documents or tangible things in your possession, custody, or control, to-wit:

See Exhibit A attached hereto and incorporated herein by reference.

You are commanded to produce such documents to Donald E. Herrmann, on or before the 30th day after service of the Subpoena Duces Tecum at Kelly Hart & Hallman LLP, 201 Main Street, Suite 2500, Fort Worth, Texas 76102. Such documents may be used as evidence in the above-referenced cause of action.

Further, data and information responsive to this Subpoena Duces Tecum that exists in electronic or magnetic form should also be produced in paper form in accordance with this Subpoena Duces Tecum and Rule 196.4 of the Texas Rules of Civil Procedure.

FAILURE TO OBEY THIS SUBPOENA MAY BE TREATED AS A CONTEMPT OF COURT. TEXAS RULE OF CIVIL PROCEDURE 176.8(a) PROVIDES AS

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FOLLOWS: Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

This Subpoena Duces Tecum is issued at the request of Vantage Energy, L.L.C. and The Caffey Group, L.L.C. whose attorneys of record are Donald E. Herrmann (State Bar No. 9541300), and Richard T. McMillan II (State Bar No. 24055945), Kelly Hart & Hallman LLP, 201 Main Street, Suite 2500, Fort Worth, Texas 76102 and Alfred G. Allen, III (State Bar No. 01018300), Turner & Allen, A Professional Corporation, P.O. Drawer 930, Graham, Texas 76450.

Date of Issuance: August __, 2010

SUBPOENA ISSUED BY:

Donald E. Herrmann
State Bar No. 09541300
Richard T. McMillan II
State Bar No. 24055945
Roel J. Fabela
State Bar No. 24069691
KELLY HART & HALLMAN LLP
201 Main Street, Suite 2500
Fort Worth, Texas 76102
Telephone: (817) 332-2500
Facsimile: (817) 878-9280

Alfred G. Allen, III
State Bar No. 01018300
TURNER & ALLEN
A Professional Corporation
P.O. Drawer 930
Graham, Texas 76450
Telephone: (940) 549-3456
Facsimile: (940) 549-5691

ATTORNEYS FOR DEFENDANTS VANTAGE ENERGY, LLC AND THE CAFFEY GROUP, LLC

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OFFICER'S RETURN

I hereby certify that I received the annexed Subpoena Duces Tecum on the ____ day of August 2010, at ____ o'clock ____ m., and executed same by delivering a copy of the Subpoena Duces Tecum to the Southwest Fort Worth Alliance by serving its Custodian of Record. 5341 Wooten Drive, Fort Worth, Texas 76133, on the ____ day of August, 2010, at ____ o'clock ____ m. I have tendered a witness fee of \$1.00 in cash. My fee for execution of this Subpoena Duces Tecum was paid in advance.

By: _____
Person who is not a party to the suit, and is not less than 18 years of age.

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EXHIBIT A**A. INSTRUCTIONS**

1. This Subpoena *duces tecum* requires the recipient to produce all responsive documents that are in its or its attorney's or agent's actual or constructive possession, custody, or control.
2. This Request is continuing and requires supplemental production in accordance with the Texas Rules of Civil Procedure.
3. If you maintain that any document requested herein is protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other privilege or doctrine, then:
 - a. specify the nature of the privilege or doctrine you claim and the grounds for claiming it; and
 - b. identify the document, including its date, subject, author(s), recipient(s), and all other persons whom you believe have seen it.
4. If you object to any Request or part thereof, produce all documents to which your objection does not apply.
5. If in answering this Request you claim any ambiguity in either the Request or a definition or instruction applicable thereto, identify in your response the language you consider ambiguous and state the interpretation you are using in responding.
6. In the event that multiple copies of a document exist, produce every copy on which appear any notations or markings of any sort not appearing on any other copy.
7. If you or your attorneys know of the existence, past or present, of any document described in this Request, but such document is not presently in the possession, custody, or control of you or your agents, representatives, or attorneys, so state in response to this Request, identify such document in response to the Request, and identify the individual in whose possession, custody, or control the document was last known to reside. If such document no longer exists, state when, how, and why such document ceased to exist.
8. The singular form of a word shall be interpreted as plural and the plural form of a word shall be interpreted as singular whenever appropriate, in order to bring within the scope of this Request any document which might otherwise be considered beyond its scope.
9. The documents produced in response to this request shall be produced as they are maintained in the normal course of business.
10. The present tense shall be construed to include the past tense, and vice versa.

11. Capital letters shall be construed to include lowercase letters, and vice versa.

In addition, all associated file labels, file headings, and file folders shall be produced together with the responsive documents from each file, and each file shall be identified as to its owner or custodian. All documents that cannot be legibly copied shall be produced in their original form; otherwise, you may produce photocopies. Each page shall be given a discrete production number.

B. DEFINITIONS

The following definitions and instructions apply to the requests listed below:

1. The terms "SWFA," "you," "your," or "yourself" 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.

2. The term "Vantage" as used herein, refers to 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 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 "Property" shall mean the property area/neighborhoods covered by the Southwest Fort Worth Alliance including, but not limited to, the following neighborhoods: Candleridge, Candle Ridge West, Foster park, Kelliss Park, Hallmark Camelot-Highland Terrace, Meadow Creek, Meadow Creek South, Meadow Creek Southgate, Meadows, Meadows of

CandleRidge, Overton South, Overton Woods, Ridgeview Estates, South Hills Gas Group, Southgate, Stone Meadow, Summer Creek Meadows, Summer Creek Ranch, Summer Creek South, Tanglewood Park Homes, Trail Lake Estates, Villages of Sunset Pointe, Wedgwood, Wedgwood Central, Wedgwood East, Wedgwood Middle, Wedgwood Square NEZ, Wedgwood West, Westcliff, Westcliff West, Westcliffe, Western Trails, Wilshire, Windsor Park, Windsor Place, and Woodmont.

5. The term "SWFA Mineral Owners" shall mean mineral owners whose property is located in the Property covered by SWFA.

6. 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.

7. "And" and "or" shall be construed as conjunctive or disjunctive to ensure the provision of additional information or more complete answers and to avoid the questions herein being considered ambiguous, inaccurate or confusing.

8. As used herein, the terms "relate(s) to," "refer(s) to," "regarding," "relating to," "concerning," or "evidence" mean any and all information which refer to, pertain to, reflect upon, or are in any way logically or factually connected with or may afford any information regarding the matters discussed.

9. For all words, the singular form of a word shall be construed to mean the plural and the plural to mean the singular when doing so would ensure the provision of additional information or more complete answers and to avoid the questions herein being considered ambiguous, inaccurate or confusing. The masculine gender of any word used herein includes the feminine and vice versa. The past tense of a verb used herein includes the present tense and vice versa.

10. 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.

11. 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.

12. You are to produce all documents, as defined above, and tangible things that are in your possession, control, or custody, or in the possession, control, or custody of any attorney for you. Without limiting the term "control," a document or tangible thing is deemed to be within in your control if you have ownership, possession, or custody of the document or tangible thing, or the right to secure the document or tangible thing or copy thereof from any person or public or private entity having physical possession thereof.

C. REQUESTS FOR DOCUMENTS TO BE PRODUCED

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

1. Any and all documents exchanged between you and the SWFA Mineral Owners concerning Vantage or Caffey.
2. Any and all documents exchanged between you and Vantage or Caffey.
3. Any and all documents exchanged between you and any member of the SWFA member association concerning Vantage or Caffey.
4. Any and all documents exchanged between the SWFA Mineral Owners and you concerning any aspect of the Property as it pertains to the development of oil, gas and other minerals.
5. Any and all documents exchanged between you and any member of the SWFA member association concerning the development of oil, gas and other minerals.
6. Any and all documents exchanged between you and any member of the current or prior board of directors of SWFA (or any other leadership group of SWFA).
7. Any and all documents exchanged between you and any other neighborhood associations concerning the development of oil, gas and other minerals.
8. Any and all documents exchanged between you and any other neighborhood associations concerning Vantage or Caffey.
9. A copy of any agreement entered into, if any, and/or any potential or possible agreements by or between you and Vantage or Caffey.
10. A copy of any agreement entered into, if any, and/or any potential or possible agreements by or between you and the SFWA Mineral Owners.
11. A copy of any agreement entered into, if any, and/or any potential or possible agreements by or between you and any member of the SWFA member association.

12. Any and all documents, including presentations, invitations, handouts, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video relating or concerning any negotiations between you and Vantage or Caffey regarding the development of oil, gas and other minerals between you and Vantage or Caffey.
13. Any and all documents, including presentations, invitations, handouts, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video recordings that you received, reviewed, distributed, and/or prepared concerning the development of oil, gas and other minerals.
14. Any and all documents, including presentations, initiations, handouts, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video recordings that you received, reviewed, distributed, and/or prepared relating to the Barnett Shale litigation.
15. Any and all documents, including presentations, initiations, handouts, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video recordings that you received, reviewed, distributed, and/or prepared by SWFA.
16. Any and all documents, including presentations, initiations, handouts, drawings, graphs, charts, photographs, tape or electronic recordings, and audio/video recordings that you reviewed, distributed, 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.

17. A copy of any documents that you were shown, received and/or were given at any SWFA 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.
18. Any and all documents reflecting the organizational leadership of SWFA.
19. All communications, correspondence, e-mails, memoranda or notes showing or reflecting any communications or conversations between you and Vantage or Caffey.
20. All communications, correspondence, e-mails, memoranda or notes showing or reflecting any communications or conversations between you and the SWFA Mineral Owners.
21. All communications, correspondence, e-mails, memoranda or notes showing or reflecting any communications or conversations between you and any member of the SWFA member association.
22. All communications, correspondence, e-mails, memoranda or notes showing or reflecting any communications or conversations between you and any other oil and gas company.
23. All communications, correspondence, e-mails, memoranda or notes showing or reflecting any communications or conversations between SWFA and any member of the current or prior board of directors of SWFA or any other leadership group of SWFA.

24. 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 Vantage or Caffey.
25. 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 the SWFA Mineral Owners.
26. 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 member of the SWFA member association.
27. All transcripts, minutes or recordings, including audio or video recordings, of any kind involving Vantage or Caffey.
28. All transcripts, minutes or recordings, including audio or video recordings, of any kind involving the SWFA Mineral Owners.
29. All transcripts, minutes or recordings, including audio or video recordings, of any kind involving any member of the SWFA member association.
30. All transcripts, minutes or recordings, including audio or video recordings, of any and all meetings held by SWFA.