

Exhibit C

IN RE: ESTATE OF	§	IN THE PROBATE COURT
	§	
MAX D. HOPPER,	§	
	§	
DECEASED	§	
<hr/>		
JO N. HOPPER,	§	NO. 3
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
JP MORGAN CHASE, N.A., STEPHEN	§	
B. HOPPER and LAURA S. WASSMER,	§	
	§	
Defendants.	§	DALLAS COUNTY, TEXAS

**JPMORGAN CHASE BANK, N.A.'S RESPONSE TO STEPHEN HOPPER'S AND
LAURA WASSMER'S REQUESTS FOR PRODUCTION**

TO: STEPHEN HOPPER and LAURA WASSMER, by their attorneys of record, Gary S. Stolbach, Mark C. Enoch and Melinda H. Sims, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Suite 500, Dallas, Texas 75254-1449.

Pursuant to TEX. R. CIV. P. 196, JPMorgan Chase Bank, N.A., in its corporate capacity (the "Bank"), serves its Response to Stephen Hopper's and Laura Wassmer's Requests for Production to JPMorgan Chase Bank, N.A.

OBJECTIONS TO INSTRUCTIONS

1. The Bank objects to Instruction No. 2 and Instruction No. 3 because they are overly broad and seek to impose obligations beyond those imposed by the Texas Rules of Civil Procedure.

2. The Bank objects to Instruction No. 5 because the electronic or magnetic data requested, including metadata, is not reasonably available to the Bank in its ordinary course of business and through reasonable efforts. The Bank will produce documents in Single Image TIFFs on compact discs.

3. The Bank objects to Instruction No. 7 because it purports to impose on the Bank an obligation to produce documents that are not in the Bank's possession, custody or control. In stating below that it will produce documents, the Bank is stating that it will produce documents that are in its possession, custody or control in its corporate capacity. JPMorgan Chase Bank, N.A., in its capacity as Independent Administrator (the "Administrator") of the Estate of Max D. Hopper has separately responded to, and produces documents responsive to the requests.

4. The Bank objects to Instruction No. 9 on the grounds that it attempts to impose an obligation that is overly broad, unduly burdensome and beyond the obligations imposed by the Texas Rules of Civil Procedure.

5. The Bank objects to Instruction No. 10 on the grounds that it attempts to impose an obligation that is overly broad, unduly burdensome and beyond the obligations imposed by the Texas Rules of Civil Procedure.

GENERAL OBJECTION

1. The Bank objects, under Texas Finance Code § 59.006, to Stephen Hopper's and Laura Wassmer's requests for production of customer records. Because this provision provides the "exclusive method" for discovery of the Bank's customer records, Stephen Hopper and Laura Wassmer must satisfy the provision's requirements by paying for the Bank's "reasonable costs of complying with the record request" before such records are produced.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: All documents identified by you in your response to any Interrogatories in this Cause.

RESPONSE: Subject to its objections to instructions, which it incorporates by reference, the Bank will produce a copy of the agreement referred to in its answers to interrogatories in this Cause.

REQUEST FOR PRODUCTION NO. 2: The engagement letter and/or fee agreement with your attorneys relating to this Cause.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 2 because it seeks documents that are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The Bank is withholding documents based upon the attorney-client privilege.

REQUEST FOR PRODUCTION NO. 3: All documents identified by you in response to any Requests for Disclosure in this Cause.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 3 on the grounds that it seeks to obtain discovery concerning testifying expert witnesses through a means other than the means specified in Texas Rule of Civil Procedure 195.1. Subject to those objections, the Bank refers you to the Administrator's response to this request and states that it will not presently be producing any documents responsive to Request No. 3 in addition to the documents produced by the Administrator or referred to in the response to Request No. 1 above.

REQUEST FOR PRODUCTION NO. 4: All photographs relating to the assets of the Estate, or any assets that Jo Hopper assert [sic] are her separate property.

RESPONSE: Subject to its objections to instructions, which it incorporates by reference, the Bank refers you to the Administrator's response to this request and states that it will not be producing any documents responsive to Request No. 4 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 5: All documents reflecting communications with anyone, save and except communications solely between you and your attorneys of record in this Cause, relating to the subject matter of this Cause.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 5 because it is overly broad and unduly burdensome. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 5 in addition to the documents produced by the Administrator. The Bank is withholding documents based upon the attorney-client privilege and the work product privilege.

REQUEST FOR PRODUCTION NO. 6: All documents reflecting communications with anyone, save and except communications solely between you and your attorneys of record in this Cause, relating to JPMorgan's involvement in the administration of the Estate.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 6 because it is overly broad and unduly burdensome. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 6 in addition to the documents

produced by the Administrator. The Bank is withholding documents based upon the attorney-client privilege and the work product privilege.

REQUEST FOR PRODUCTION NO. 7: All documents reflecting communications with anyone, save and except communications solely between you and your attorneys of record in this Cause, relating to Jo Hopper's involvement in the administration of the Estate, including but not limited to the gathering of assets and the appraisal of assets.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 7 because it is overly broad and unduly burdensome. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 7 in addition to the documents produced by the Administrator. The Bank is withholding documents based upon the attorney-client privilege and the work product privilege.

REQUEST FOR PRODUCTION NO. 8: All documents reflecting communications with anyone, save and except communications solely between you and your attorneys of record in this Cause, relating to Stephen Hopper's and Laura Hopper's [sic] involvement in the administration of the Estate.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 8 because it is overly broad and unduly burdensome. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 8 in addition to the documents produced by the Administrator. The Bank is withholding documents based upon the attorney-client privilege and the work product privilege.

REQUEST FOR PRODUCTION NO. 9: All documents reflecting communications with anyone, save and except communications solely between you and your attorneys of record in this Cause, relating to Decedent's assets, the Estate, or any assets that Jo Hopper claims are her separate property, for the past ten years.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 9 because it is overly broad and unduly burdensome. Subject to its objections, the Bank refers you the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 9 in addition to the documents produced by the Administrator. The Bank is withholding documents based upon the attorney-client privilege and the work product privilege.

REQUEST FOR PRODUCTION NO. 10: All documents relating to Decedent's assets, the Estate, or assets that Jo Hopper claims are her separate property, for the past ten years, including but not limited to records of purchasing or otherwise acquiring the assets, selling or otherwise disposing of the assets, photographs, deed records, tax and accounting records, appraisals, financial statements, and insurance valuation records.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 10 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 10 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 11: All documents evidencing any gift of property, real or personal, from Decedent to Jo Hopper.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 11 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 11 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 12: All documents showing property owned by Decedent or his Estate, or assets that Jo Hopper claims are her separate property, for the past ten years.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 12 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 12 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 13: All documents relating to any assets of Decedent transferred to Jo Hopper or for her benefit, for the past ten years.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 13 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 13 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 14: All documents relating to any positions of employment or service held by Jo Hopper or the Decedent, including service on boards of directors, for the past ten years.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 14 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 14 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 15: All documents relating to the value or valuation of (before and after Decedent's death) Decedent's assets or assets that Jo Hopper claims are her separate property, for the past ten years.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 15 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 15 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 16: All documents relating to the value or valuation of (before and after Decedent's death) Decedent's non-probate assets, including but not limited to life insurance policies, retirement accounts, and accounts held at financial institutions, for the past ten years.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 16 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 16 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 17: All documents (effective as of the Decedent's death) that show who is the beneficiary, right of survivor, or payable on death designee for any of Decedent's assets, including but not limited to life insurance policies, retirement accounts, and accounts held at financial institutions.

RESPONSE: Subject to its objections to instructions, which it incorporates by reference, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 17 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 18: All documents that relate to the characterization of assets as Decedent's separate property, as Decedent's community property, or as Jo Hopper's separate property.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 18 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 18 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 19: All documents that relate to Decedent's financial interest in, or obligations to, eCivis or any other asset of Decedent or his Estate, for the ten years prior to Decedent's death.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 19 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 19 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 20: All documents that relate to Jo Hopper's financial interest in, or obligations to, any assets that Jo Hopper claims are her separate property, for the ten years prior to Decedent's death.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 20 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank.. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 20 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 21: All documents that relate to the basis of Decedent's assets, or to the basis of any assets that Jo Hopper claims are her separate property.

RESPONSE: In addition to its objections to instructions and its general objection, which it incorporates by reference, the Bank objects to Request No. 21 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 21 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 22: All documents that relate to the amount of support Jo Hopper needs from Decedent's Estate in the form of a family allowance for the

one year after Decedent's death, including but not limited to documents reflecting Jo Hopper's budget, check registers, bank statements showing fund transfers and expenditures, credit card statements, receipts, and invoices.

RESPONSE: Subject to its objections to instructions and its general objection, which it incorporates by reference, the Bank refers you to the Administrator's response to this request and states that it will produce documents responsive to Request No. 22 once Dr. Hopper and Ms. Wassmer satisfy the requirements of Texas Finance Code § 59.006.

REQUEST FOR PRODUCTION NO. 23: All documents that relate to the amount of expenses that Jo Hopper has paid since the date of Decedent's death that Jo Hopper claims should be reimbursed to her by the Estate, including but not limited to invoices, receipts, copies of checks, and copies of credit card statements.

RESPONSE: Subject to its objections to instructions and its general objections, which it incorporates by reference, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 23 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 24: All documents that reflect charges by JPMorgan or its lawyers with respect to the administration of the Estate.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 24 because it is overly broad and unduly burdensome. Subject to its objections, the Bank refers you the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 24 in addition to the documents produced by the Administrator. The Bank is withholding documents based upon the attorney-client privilege and the work product privilege.

REQUEST FOR PRODUCTION NO. 25: All financial statements, credit requests, loan packages, promissory notes, security agreements, loan agreements, collateral agreements, and business plans prepared by or on behalf of Jo Hopper, Decedent, Ho [sic] Hopper's companies, or Decedent's companies, for the past ten years.

RESPONSE: In addition to its objections to instructions and its general objections, which it incorporates by reference, the Bank objects to Request No. 25 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 25 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 26: All check registers and bank statements (and similar records from financial and investment houses) of Jo Hopper, the Decedent, and the Estate for the past ten years.

RESPONSE: In addition to its objections to instructions and its general objections, which it incorporates by reference, the Bank objects to Request No. 26 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 26 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 27: For every asset that Jo Hopper claims to be her separate property, please provide all documents evidencing the date of acquisition of the asset, the source of funds and or credit used to acquire it, any closing binder and associated purchase and sale agreements including evidence of payment for same, if any expenses were incurred with respect to such asset after purchase (such as personal or real property taxes), and documents reflecting the source and amounts of such payments.

RESPONSE: In addition to its objections to instructions and its general objections, which it incorporates by reference, the Bank objects to Request No. 27 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. . Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 27 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 28: For every source of income to Jo Hopper or Decedent generated by services provided, dividends and/or return of capital in any calendar year for the past ten years, please produce documents sufficient to identify the nature, location, value as of date of death, purchase price and date, sale price, seller, and purchaser of the asset, as well as to identify any compensation for service as an employee, on boards of directors, as an advisor or consultant, or on management committees for businesses or other entities.

RESPONSE: In addition to its objections to instructions and its general objections, which it incorporates by reference, the Bank objects to Request No. 28 because it is overly broad and unduly burdensome, including by seeking to require the Bank to search voluminous customer records to determine the full extent of Decedent's and Mrs. Hopper's customer history, if any, with the Bank. Subject to its objections, the Bank refers you to the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 28 in addition to the documents produced by the Administrator.

REQUEST FOR PRODUCTION NO. 29: All documents that relate to JPMorgan's administration of the Estate, including but not limited to JPMorgan's investigation of assets, valuation of assets, characterization of assets as separate or community property, preparation and defense of the Inventory, Appraisalment and List of Claims and any amendments or supplements thereto, allocation of fees and expenses between the Estate and Jo Hopper's one-half community property interest, determination of exempt property to set aside for Jo Hopper, determination of any family allowance, determination of any

expenses of Jo Hopper, S. Hopper, and Wassmer to reimburse, and determination of how to partition, distribute, or sell assets.

RESPONSE: In addition to its objections to instructions, which it incorporates by reference, the Bank objects to Request No. 29 because it is overly broad and unduly burdensome. Subject to its objections, the Bank refers you the Administrator's response to this request and states that it will not be producing documents responsive to Request No. 29 in addition to the documents produced by the Administrator. The Bank is withholding documents based upon the attorney-client privilege and the work product privilege.

Respectfully submitted,

HUNTON & WILLIAMS LLP

By: 

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**ATTORNEYS FOR
JPMORGAN CHASE BANK, N.A.
IN ITS CORPORATE CAPACITY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has been served by certified mail, return receipt requested, on the following counsel of record on the 28th day of November, 2011:

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