

Exhibit A

Requests, as required by TRCP 193.5.

3. If any item requested by these Requests is being withheld on the basis of a claim of privilege or discovery exemption, identify the nature of the privilege or exemption; the basis for its assertion as to each specific item withheld; the nature of the item withheld; and all recipients of the item.

4. You are required to produce the items as they are kept in the ordinary course of business or you must organize and label them to correspond with the categories in this Request.

5. Pursuant to Rule 196.4, to the extent that any documents exist in electronic format, you are instructed to produce the electronic or magnetic data including metadata on compact disc(s).

6. Copies of documents supplied in response hereto must be fully legible and complete, with no portions deleted during copying.

7. In answering these Requests, you are requested to furnish all information which is available to JPMorgan, including that which has been obtained by and that which is now in the possession of its attorneys, employees, agents and other representatives, and not merely the information known by the individuals preparing this response.

8. If JPMorgan withholds information based on any claim of privilege, JPMorgan must comply with Texas Rule of Civil Procedure 193.3 and a withholding statement must be served and must state that (1) information responsive to the written discovery request has been withheld, (2) identify the request to which the information or material relates, and (3) identify the privileges asserted.

9. If JPMorgan or any agent of JPMorgan, including JPMorgan's attorney(s), is aware of the existence of any document within the scope of these requests, which is not within the custody, possession, or control of JPMorgan, please identify any such document in a written response to the request. In identifying such a document, please provide the following

information: the name, address, and telephone number of the person who has possession, custody, or control over the document, a brief summary of the nature of the information contained in the document, the date of the document, and the name of the person who prepared the document.

10. If any document referred to in your response to these Requests was, but no longer is, in your possession, custody or control, or the control of your agents or representatives, state whether it (a) is missing or lost, (b) has been destroyed, (c) has been transferred to others, identifying the recipient; and, (d) describe the circumstances surrounding any disposition of the document.

11. Without interfering with the readability of the document, label or mark each document produced in a manner that shows the particular requests to which it is responsive.

12. If you withhold any documents subject to an objection, please clearly state that the documents are being withheld pursuant to such objection.

II.

DEFINITIONS

1. "Document," whether singular or plural, as used herein is used in the broadest sense permitted by the Texas Rules of Civil Procedure and shall include, but is not limited to any written, printed, typed, recorded or other graphic material of any kind or character in the possession or custody of JPMorgan or its attorneys, including but not limited to letters, correspondence, telegrams, teletypes, electronic mail ("email") messages, instant messages, text messages, chat logs, memoranda, records, contracts, memoranda of personal or telephone conversations or conferences, diaries, appointment and scheduling books, timesheets, day timers, desk calendars, desk mats, drawings, work papers, reports, notes, charts, slides, photographs, photo records, sound recordings (including taped conversations) or transcripts thereof, intra- or interoffice communications, microfilm, microfiche, bulletins, studies, summaries, analyses,

notices, books, pamphlets, lists, brochures, periodicals, indexes, diagrams, studies, plans, opinions, articles, press statements, recordings on other media or transcripts, agreements, proposed agreements, contracts, journals, work notes, research reports, statistics, statistical records, offers, affidavits, consultants' reports, appraisals, expense accounts, or summaries of negotiations, brochures, lists, journals, advertisements, data processing input and output, and any other tangible items, of any nature, however produced or reproduced, and other data compilations from which information can be obtained or translated, if necessary, into reasonably usable form.

“Document” also means the original, or a copy of the original if no original exists, and any and all drafts, and includes every copy of the original bearing any marking not on the original.

The term “document” is employed in its most comprehensive sense. The word “or” shall be construed either conjunctively or disjunctively, or both conjunctively and disjunctively, so as to make the greatest number of documents responsive to any request.

2. The term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a document, whether or not such draft was superseded by a later draft and whether or not the terms of the draft are the same as or different from the terms of the final document; and the term “copies” means all copies of any documents that are not identical in every respect with the documents being produced.

3. References to “JPMorgan Chase Bank, N.A.,” “JPMorgan,” “you,” and “your” are intended to refer to JPMorgan Chase Bank, N.A. in its capacity as Temporary Administrator of the Estate of Max D. Hopper, Deceased, Independent Administrator of the Estate of Max D. Hopper, Deceased, and in its corporate capacity (but not attorneys of record for JPMorgan in the Cause), as well as any other person acting on its behalf.

4. As used herein, “JPMorgan” means JPMorgan and includes all persons acting or

purporting to act on behalf of JPMorgan except JPMorgan's attorneys.

5. As used herein, "Mrs. Hopper" and "Jo Hopper" means Jo N. Hopper and includes all persons acting or purporting to act on behalf of Jo N. Hopper.

6. "Communication(s)" or "correspondence" shall mean any contact or act by which any information or knowledge is transmitted or conveyed between two or more persons and shall include, without limitation, written contact by such means as letters, memoranda, telegrams, telexes, electronic mail ("email") messages, or by any documents, and oral contact by such means as face-to-face meetings or telephone conversations.

7. "Person" or "individual" or "entity" means the plural as well as the singular and includes any natural person, firm, corporation, association or partnership, governmental entity or subdivision thereof, or any other form of organization, association or entity.

8. "Reflect", "reflecting", "relate", or "relating" when used with respect to a document, agreement, subject or fact, means embodying, containing, evidencing, concerning, pertaining to, regarding, reciting, recording, supporting, refuting or referring to such matter.

9. "Statement" as used in this request, refers to a written statement signed or adopted by the person making it (sworn or unsworn) as well as oral statements recorded by any stenographic, mechanical, electrical or other type of recording, or any transcription thereof which is a substantial verbatim recital of a statement made by a person and contemporaneously recorded.

10. "Cause," as used herein, refers to this Cause No. NO. PR-11-3238-3, in Probate Court No. 3 of Dallas County, Texas.

11. "Identify" shall have the meaning set forth below according to the context in which the term is used:

a. When used in connection with natural persons, "identify" shall mean state the person's full name, present address, and phone number.

b. When used in connection with corporations, partnerships, associations, or organizational units, “identify” shall mean state the full name of the corporation, partnership, association, or organizational unit, its present business address, and its telephone number(s).

c. When used in connection with documents, “identify” shall mean to provide, when applicable, (i) the identity of each person who wrote, signed, initialed, dictated, authorized, or otherwise participated in the creation of the document, (ii) the identity of each person who directed preparation of the document, (iii) the identity of each addressee or recipient of the document, (iv) the title or nature of the document (e.g., memorandum or letter), (v) the date of the document, (vi) a general description of the subject matter contained in the document, (vii) the present location of the original, and (viii) the custodian of the document.

d. When used in connection with statements, “identify” shall mean to describe any oral or written exchange of words, thoughts, or ideas among two or more persons whether person-to-person, in a group, in writing, by telephone, by email, voice mail, or any other process, electronic or otherwise. In describing communications (i) identify by name, last known address, and phone number all persons present when the communication was spoken, heard, written, or read, (ii) identify the form of the communication (e.g., written, oral, in person, or by electronic means), (iii) state the date of the communication, and (iv) identify all documents that refer or relate to the communication.

e. When used in connection with an event or incident, “identify” shall mean to describe the date, time, duration, location, participants, and actions that transpired or are associated with the event or incident.

12. As used herein, “Decedent” shall mean Max D. Hopper.

13. As used herein, “Estate” shall mean the Estate of Max D. Hopper, Deceased, including the one-half community property interest of Mrs. Hopper.

14. References to “Stephen Hopper” and “S. Hopper” are intended to refer to Stephen

Hopper and shall include the agents and related persons, as well as any other person acting on his behalf.

15. References to “Laura Wassmer” and “L. Wassmer” are intended to refer to Laura Wassmer and shall include the agents and related persons, as well as any other person acting on her behalf.

III.

DOCUMENTS TO BE PRODUCED

1. All documents identified by you in your response to any Interrogatories in this Cause.
2. The engagement letter and/or fee agreement with your attorneys relating to this Cause.
3. All documents identified by you in response to any Requests for Disclosure in this Cause.
4. All photographs relating to the assets of the Estate, or any assets that Jo Hopper assert are her separate property.
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.
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.
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.
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 involvement in the administration of the Estate.
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.
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.

11. All documents evidencing any gift of property, real or personal, from Decedent to Jo Hopper.
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.
13. All documents relating to any assets of Decedent transferred to Jo Hopper or for her benefit, for the past ten years.
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.
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.
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.
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.
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.
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.
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.
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.
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.
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.

24. All documents that reflect charges by JPMorgan or its lawyers with respect to the administration of the Estate.
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 Hopper's companies, or Decedent's companies, for the past ten years.
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.
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.
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.
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, Appraisal 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.

Respectfully submitted,

GLAST, PHILLIPS & MURRAY, P.C.

By: Melinda H. Sims

Gary S. Stolbach, Esq.
State Bar No. 19277700
Mark C. Enoch, Esq.
State Bar No. 06630360
Melinda H. Sims, Esq.
State Bar No. 24007388

14801 Quorum Drive, Suite 500
Dallas, Texas 75254-1449
Telephone: 972-419-8300
Facsimile: 972-419-8329

ATTORNEYS FOR STEPHEN HOPPER AND
LAURA WASSMER


CERTIFICATE OF SERVICE

On this the 28th day of October, 2011, I hereby certify that a true and correct copy of the foregoing was sent via facsimile to the following counsel of record:

Mr. Thomas H. Cantrill
Mr. John C. Eichman
Hunton & Williams
1445 Ross Avenue, Suite 3700
Dallas, Texas 75202

Mr. James Albert Jennings
Gerhard & Jennings, P.C.
1601 Elm Street, Suite 4242
Dallas, Texas 75201

Mr. Michael L. Graham
The Graham Law Firm, P.C.
100 Highland Park Village, Suite 200
Dallas, Texas 75205



Melinda H. Sims