

CAUSE NO. 07-12-14420CV

THE ENCINITOS RANCH,
MCGILL RANCH, LTD.,
MARY DRUCILLA BURNS,
INDIVIDUALLY, AS THE EXECUTRIX
OF THE ESTATE OF FRANCIS MCGILL
STEWART, DECEASED, AS TRUSTEE
FOR THE MARY DRU MCGILL BURNS
TESTAMENTARY TRUST, AS TRUSTEE
FOR THE STEPHEN H. BURNS TRUST,
AS TRUSTEE FOR THE ANASTASIA
STEWART TRUST, AND AS TRUSTEE
FOR THE LAURA KATHERINE BURNS
TRUST,
KATHLEEN MCGILL ENYART,
INDIVIDUALLY AND AS TRUSTEE FOR
THE KATHLEEN MCGILL ENYART
TRUST,
LINDA JANE MCGILL WEAKLY,
INDIVIDUALLY AND AS TRUSTEE FOR
THE LINDA JANE MCGILL WEAKLY
TRUST,
ANN MCGILL ERCK,
SCOTT MCGILL, JR. AND
STEPHANIE DAWN MCGILL
Plaintiffs,

vs.

EXXON MOBIL CORPORATION,
EXXON MOBIL PRODUCTION
COMPANY, CHEVRON CORPORATION,
TEXACO INC., CHEVRONTEXACO E&P
COMPANY, PEOPLES ENERGY
PRODUCTION-TEXAS, L.P., PEOPLES
ENERGY PRODUCTION CO., EL PASO
EXPLORATION & PRODUCTION
COMPANY, EL PASO CORPORATION,
SIERRA RESOURCES, LLC,
Defendants.

IN THE DISTRICT COURT OF

BROOKS COUNTY, TEXAS

79TH JUDICIAL DISTRICT

EXXON MOBIL CORPORATION AND EXXONMOBIL PRODUCTION
COMPANY'S FIRST REQUEST FOR PRODUCTION TO ALL PLAINTIFFS

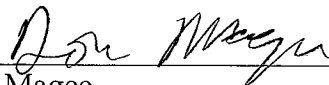
TO: Plaintiffs, by and through their attorney of record, Roger S. Braugh, Jr., SICO, WHITE &

BRAUGH L.L.P., 900 Frost Bank Plaza, 802 N. Carancahua, Corpus Christi, Texas 78470.

Pursuant to Texas Rule of Civil Procedure 196 and other applicable authority, Defendant Exxon Mobil Corporation and ExxonMobil Production Company (collectively "ExxonMobil") serves its First Requests for Production to all Plaintiffs. Plaintiffs are directed to produce the documents requested at the law offices of McGinnis, Lochridge & Kilgore, L.L.P., 600 Congress Avenue, Suite 2100, Austin, Texas 78701.

Respectfully submitted,

MCGINNIS, LOCHRIDGE & KILGORE, L.L.P.
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By: 
Don Magee

**ATTORNEY FOR DEFENDANTS
EXXON MOBIL CORPORATION AND
EXXONMOBIL PRODUCTION COMPANY**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been sent to all counsel of record in the manner indicated below, on February 26th, 2009:

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Corpus Christi, Texas 78470
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Production and El Paso Corporation
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Corpus Christi, Texas 78470-0177
Fax: 361-884-7261
Counsel for Dirnett, Inc.
Via First Class Mail



Don Magee

I.
INSTRUCTIONS

1. The documents requested herein are not restricted to your personal knowledge, but includes all documents in the possession of any of your agents, representatives, attorneys or experts.
2. The following rules of construction apply to each request for production:
 - (a) The terms "and" and "or" shall be construed in the conjunctive or in the disjunctive to bring within the scope of the request any information that might otherwise be construed to be outside its scope; and
 - (b) The use of the singular includes the plural, the masculine gender includes the feminine and neuter, and vice versa.
3. If you refuse to provide a document requested on the basis of a privilege of any kind, please (a) state the nature of the claim of privilege and (b) state the facts relied upon in support of the claim of privilege.
4. These requests for production are continuous in nature and your responses should be supplemented as required by the Texas Rules of Civil Procedure.

II.
DEFINITIONS

1. **"Plaintiffs," "you" or "your"** individually and collectively refers to: The Encinitos Ranch; McGill Ranch, Ltd.; Mary Drucilla Burns, Individually, as Executrix of the Estate of Francis McGill Stewart, Deceased, as Trustee for the Mary Dru McGill Burns Testamentary Trust, as Trustee for the Stephen H. Burns Trust, as Trustee for the Anastasia Stewart Trust, and as Trustee for the Laura Katherine Burns Trust; Kathleen McGill Enyart, Individually and as Trustee for the Kathleen McGill Enyart Trust; Linda Jane McGill Weakly, Individually and as Trustee for the Linda Jane McGill Weakly Trust; Ann McGill Erck; Scott McGill, Jr.; and Stephanie Dawn McGill, and their attorneys, consultants, investigators, agents, representatives, or anyone acting for Plaintiffs or on their behalf, including but not limited to Mr. Gary Holloway, Ms. Elizabeth Burns or Mr. Stephen Burns.
2. **"Petition"** refers to Plaintiffs' Second Amended Petition filed by Plaintiffs in the 79th Judicial District Court of Brooks County, Texas, or any amendment or supplement thereto.
3. **"ExxonMobil"** refers to Exxon Mobil Corporation and ExxonMobil Production Company, or any person or any person or entity that you contend was acting for or on

ExxonMobil's behalf.

4. The “**Encinitos Ranch**,” “**Property**” or “**property**” refers to the portions of the Encinitos Ranch located in Brooks, Hidalgo, Jim Hogg and Starr Counties, Texas covered by those certain oil and gas leases identified in Plaintiffs’ Petition.

5. “**Document**” or “**documents**” shall mean anything covered in Rule 1001, TEXAS RULES OF EVIDENCE and Rule 192.3(b), TEXAS RULES OF CIVIL PROCEDURE including, but not limited to the original and each non-identical copy (whether different from the original because of marginal notes or other material inserted, or attached, or otherwise) of any written or graphic matter however produced or reproduced, whether sent or received or neither, including drafts and both sides thereof, and including but not limited to: papers, books, letters, correspondence, telegrams, cables, telex messages, memoranda, typed or handwritten notes, notations, work papers, transcripts, minutes, reports and records of telephone or other conversations or of interviews or of conferences or meetings, maps, charts, plans, specifications, diagrams, photographs, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, ledgers, journals, financial statements, statistical records, desk calendars, appointment books, diaries, expense account records, lists, tabulations, and sound recordings, computer disks, servers, data backup and recovery software, computer printouts, data processing input and output, film, microfilm, electronic or E-mail, and all other records kept by electronic, photographic, magnetic, or mechanical means and items similar to any of the foregoing.

6. The “**Fire Cases**” refers collectively to the four cases styled: (1) Cause No. C-995-08-H; *Jon Christian Amberson and Mary Margaret Amberson v. Chevron U.S.A., Inc., El Paso Exploration & Production Management, Inc., El Paso Corporation, ExxonMobil Corporation, ExxonMobil Development Company, Enterprise Texas Pipeline, L.L.C., and AEP Texas Central Company*; In the District Court of Hidalgo, County, Texas; 389th Judicial District; (2) Cause No. C-997-08-H; *Rolando Cantu v. Chevron U.S.A., Inc., El Paso Exploration & Production Management, Inc., El Paso Corporation, ExxonMobil Corporation, ExxonMobil Development Company, Enterprise Texas Pipeline, L.L.C., and AEP Texas Central Company*; In the District Court of Hidalgo, County, Texas; 332nd Judicial District; (3) Cause No. C-997-08-H; *Rolando Cantu v. Chevron U.S.A., Inc., El Paso Exploration & Production Management, Inc., El Paso Corporation, ExxonMobil Corporation, ExxonMobil Development Company, Enterprise Texas Pipeline, L.L.C., and AEP Texas Central Company*; In the District Court of Hidalgo, County, Texas; 332nd Judicial District; and (4) Cause No. C-996-08-H; *Tres Hojas, LLC and James Argyle McAllen, Jr. v. Chevron U.S.A., Inc., El Paso Exploration & Production Management, Inc., El Paso Corporation, ExxonMobil Corporation, ExxonMobil Development Company, Enterprise Texas Pipeline, L.L.C., and AEP Texas Central Company*; In the District Court of Hidalgo, County, Texas; 389th Judicial District.

7. The “**Kelsey Compressor Station**” refers to the Kelsey Gas Plant or Kelsey Gas Compression Station located on two tracts of the Encinitos Ranch, which have been leased and operated by ExxonMobil or its predecessors for decades.

III.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please provide all documents that evidence, reflect or refer to the Mary Dru McGill Burns Testamentary Trust, Stephen H. Burns Testamentary Trust, Anastasia Stewart Testamentary Trust, Laura Katherine Burns Trust, Kathleen McGill Enyart Trust, and the Linda J. McGill Weakly Trust, including, but not limited to, the formation documents, any amendments thereto, minutes of meetings, notes, court or tax filings, and any accounting records.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please provide all documents relating to the formation and/or operation of McGill Ranch, Ltd., including, but not limited to the partnership agreement, formation documents, and all operational records and business records.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Please provide any and all appraisals, or other valuations, of the Encinitos Ranch and/or the Property performed for any purpose.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Please provide all surveys of the Property, or any part of the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: Please provide all documents that evidence, reflect or relate to the sale or efforts to sell the Property, or any part of the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: Please provide all documents that evidence, reflect or relate to the use of any chemicals, minerals, or other substances, including pesticides or fertilizers, on all or any part of the Property for any purpose.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: Please provide all documents that evidence, reflect or relate to when Plaintiffs first allegedly discovered damage to the surface or subsurface of the Property as a result of the contamination, pollution, or other damage purportedly caused by ExxonMobil's operations.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8: Please provide all estimates or bids to clean up or remediate the Property, or any part of the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9: Please provide all documents evidencing, reflecting or referring to any prior claims, demands, or lawsuits regarding the Property or oil and gas operations on the Property other than this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10: Please provide a copy of all tax returns, or schedules therefrom, evidencing, reflecting or referring to any income received from the Property, or oil and gas operations on the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11: Please provide any and all documents that evidence, reflect or refer to the value of the Property, or any part of the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12: Please provide any and all loan applications submitted by Plaintiffs, or any Plaintiff, where you have listed the Property or any portion of the Property as an asset.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: Please provide any and all documents which evidence, reflect or refer to any valuation of Plaintiffs' royalty interest in the Property or attempt to value any Plaintiff's royalty interest.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14: Please provide any and all financial statements that include, directly or indirectly, the value of the Property, any part of the Property, or any Plaintiff's royalty interest in the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15: Please provide any and all settlement agreements, releases, or judgments entered into in connection with any other litigation relating to the Property, or oil and gas operations on the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16: Please provide all documents that relate to any agreement, settlement, compromise, or judgment entered into in connection with royalty payments or royalty disputes relating to oil and gas production from the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17: Please provide any and all photographs, videotapes, diagrams, maps, or other visual representations that relate to the Property or oil and gas operations on the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 18: Please provide any documents which you contend evidence, reflect or refer to “significant damage to the surface of the property” allegedly caused by ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 19: Please provide any documents which you contend evidence, reflect or refer to the “repeated requests” to ExxonMobil “for remediation, accountability, clean up, and environmental assessment and testing” that “have gone largely unheeded.”

RESPONSE:

REQUEST FOR PRODUCTION NO. 20: Please provide any documents which you contend evidence, reflect or refer to royalties that “have not been paid properly or timely on many occasions” by ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 21 Please provide any documents which you contend evidence, reflect or refer to accounting or the means and methods for calculating royalties by ExxonMobil that is “inconsistent, confusing, erroneous and largely without explanation”

RESPONSE:

REQUEST FOR PRODUCTION NO. 22: Please provide any documents which you contend evidence, reflect or refer to a failure to reasonably and prudently develop and explore the property by ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 23: Please provide any documents which you contend evidence, reflect or refer to the “repeated requests by other oil companies and operators who proposed to reasonably and prudently develop the property” to ExxonMobil that “were unreasonably ignored and rebuffed by the then current lessees and operators under the applicable leases.”

RESPONSE:

REQUEST FOR PRODUCTION NO. 24: Please provide any documents which you contend evidence, reflect or refer to the “several significant discovery wells on the property that have now conclusively proven that, heretofore, the property has not been reasonably and prudently developed by the lessees.”

RESPONSE:

REQUEST FOR PRODUCTION NO. 25: Please provide any documents which you contend evidence, reflect or refer to the “existing, unplugged wells” that “have production capabilities that have not been reasonably utilized, explored and efficiently produced” by ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 26: Please provide any documents which you contend evidence, reflect or refer to the “infrastructure [that] is unreasonably allowed to deteriorate [while] the economic viability of recovering these significant, proven reserves continues to diminish.”

RESPONSE:

REQUEST FOR PRODUCTION NO. 27: Please provide any documents which you contend evidence, reflect or refer to ExxonMobil’s gross mismanagement of its operation or facilities.

RESPONSE:

REQUEST FOR PRODUCTION NO. 28: Please provide any documents which you content evidence, reflect or refer to ExxonMobil’s alleged failure to reasonably secure the leased premises from trespassers.

RESPONSE:

REQUEST FOR PRODUCTION NO. 29: Please provide any documents relating to your allegation that ExxonMobil brings employees and/or contractors on the Property, many of whom have criminal records or are engaged in corruption and graft.

RESPONSE:

REQUEST FOR PRODUCTION NO. 30: Please provide any documents relating to your allegation that ExxonMobil has trespassed on Plaintiff's property, chattels, pipelines and have taken oil, gas or minerals from the Property, or allowed other to do it, without making any records of such transactions or paying royalties contractually owed to Plaintiffs.

RESPONSE:

REQUEST FOR PRODUCTION NO. 31: Please provide any documents that evidence, reflect or relate to Plaintiffs' efforts to secure the Property from trespassers or illegal activity of any sort.

RESPONSE:

REQUEST FOR PRODUCTION NO. 32: Please provide any documents evidencing, discussing, or relating to drug smuggling by any person and the Encinitos Ranch.

RESPONSE:

REQUEST FOR PRODUCTION NO. 33: Please provide any documents which you contend evidence, reflect or refer to unlawful trespass on the property by ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 34: Please provide any documents which you contend evidence, reflect or refer to "substandard operations and improperly abandoned facilities, equipment and infrastructure [by ExxonMobil]. . . [that] poses a serious and substantial risk of harm to the land and persons on the property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 35: Please provide all documents relating to the fire referenced in Paragraph 37 of Plaintiffs' Petition.

RESPONSE:

REQUEST FOR PRODUCTION NO. 36: Please provide any and all documents that discuss, refer to or relate to power lines on the Property, whether abandoned or in use.

RESPONSE:

REQUEST FOR PRODUCTION NO. 37: Please provide all documents that evidence, reflect or refer to income earned from the use of the surface estate of the Property. This includes, but is not limited to any revenue generated from hunting, crops, cattle or ranching operations.

RESPONSE:

REQUEST FOR PRODUCTION NO. 38: Please provide any documents that evidence, refer to, or relate to the ownership of any water wells on the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 39: Please provide any documents which evidence, reflect, or refer to any contracts or agreements by, between, or among Plaintiffs that relate to the Property, McGill Ranch, Ltd., or this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 40: Please provide any documents that evidence communications between any Plaintiff herein and Ms. Elizabeth Burns that relate to the matters at issue in this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 41: Please provide any documents that evidence communications between any Plaintiff herein and Mr. Stephen Burns that relate to the matters at issue in this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 42: Please provide all documents evidencing communications between Ms. Elizabeth Burns and Plaintiffs' counsel herein.

RESPONSE:

REQUEST FOR PRODUCTION NO. 43: Please provide all documents evidencing communications between Mr. Stephen Burns and Plaintiffs' counsel herein.

RESPONSE:

REQUEST FOR PRODUCTION NO. 44: Please provide any documents that evidence, refer to or reflect the fire referenced in Paragraph 44 of the Petition.

RESPONSE:

REQUEST FOR PRODUCTION NO. 45: Please provide any documents which you contend, evidence, reflect or refer to Plaintiffs' efforts to advise ExxonMobil of the alleged poor condition of the power infrastructure on the Encinitos Ranch and/or request for ExxonMobil to alleviate the risk of further fires.

REQUEST FOR PRODUCTION NO. 46: Please provide any documents which you contend evidence, reflect or refer to "[p]oorly maintained wells, equipment and facilities" by ExxonMobil that "threaten to contaminate and have contaminated and damaged the fragile wildlife environment of the Encinitos Ranch."

RESPONSE:

REQUEST FOR PRODUCTION NO. 47: Please provide any documents which you contend evidence, reflect or refer to material breaches by ExxonMobil of the oil and gas lease(s).

RESPONSE:

REQUEST FOR PRODUCTION NO. 48: Please provide any documents which you contend evidence, reflect or refer to violations by ExxonMobil of “common law duties of care that are owed to Plaintiffs.”

RESPONSE:

REQUEST FOR PRODUCTION NO. 49: Please provide any documents which you contend evidence, reflect or refer to “various acts of omission and commission, which collectively and severally constitute negligence” committed by ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 50: Please provide any documents which you contend evidence, reflect or refer to “improperly abandoned electrical lines” that “started a grass fire.”

RESPONSE:

REQUEST FOR PRODUCTION NO. 51: Please provide any documents relating to the grass fire in March 2008 including, but not limited to, documents that reflect or refer to the cause of the fire and the entities and/or persons who used the electrical lines that allegedly caused the fire.

RESPONSE:

REQUEST FOR PRODUCTION NO. 52: Please provide all tangible items taken from the Kelsey Compressor Station or the Kelsey Station at any time.

RESPONSE:

REQUEST FOR PRODUCTION NO. 53: Please provide all soil, water, or air samples gathered from the Encinitos Ranch, including but not limited to the all samples mentioned or discussed on the website and/or blog located at <http://www.losranchosmalulos.com/> and/or <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE:

REQUEST FOR PRODUCTION NO. 54: Please provide all lab results or test results that have been performed on any samples taken from the Encinitos Ranch, including the surface or subsurface soils, water, or air.

RESPONSE:

REQUEST FOR PRODUCTION NO. 55: Please provide all soil, water, or air test results for other properties in South Texas which you contend are in any way relevant to the matters at issue in this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 56: Please provide all Bills of Sale for wells sold or conveyed to any Plaintiff herein.

RESPONSE:

REQUEST FOR PRODUCTION NO. 57: Please provide all contracts or agreements between ExxonMobil and any Plaintiff.

RESPONSE:

REQUEST FOR PRODUCTION NO. 58: Please provide all documents reflecting notices to ExxonMobil or any other operator that the electrical power lines or poles were in need of maintenance or repair.

RESPONSE:

REQUEST FOR PRODUCTION NO. 59: Please provide any notices given to ExxonMobil or any other operator on or about December 28, 2007.

RESPONSE:

REQUEST FOR PRODUCTION NO. 60: Please provide all testing equipment, video cameras, cameras and manuals used by Plaintiffs, Elizabeth "Toddy" Burns, Stephen Burns, including any items mentioned on the website and/or blog located at <http://www.losranchosmalulos.com/> and/or <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE:

REQUEST FOR PRODUCTION NO. 61: Please provide all items gathered or mentioned in the website and/or blog located at <http://www.losranchosmalulos.com/> and/or <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE:

REQUEST FOR PRODUCTION NO. 62: Please provide all documents and communications sent to or received from other landowners regarding the matters at issue in this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 63: Please provide any documents provided to Plaintiffs in the Fire Cases

RESPONSE:

REQUEST FOR PRODUCTION NO. 64: Please provide all exhibits that you may use or anticipate using at trial.

RESPONSE:

REQUEST FOR PRODUCTION NO. 65: Please provide all royalty checks Plaintiffs have received from ExxonMobil or any other operator for production from the Encinitos Ranch.

RESPONSE:

REQUEST FOR PRODUCTION NO. 66: Please provide all documents that evidence, refer to or relate to any income Plaintiffs have received from oil and gas operations on the Property. This includes, but is not limited to, surface damage payments, bonuses, delay rentals, or advanced royalties.

RESPONSE:

REQUEST FOR PRODUCTION NO. 67: Please provide all documents that evidence, refer to or relate to any business relationships between any Plaintiff and ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 68: Please provide all documents that evidence, refer to or relate to any proposed business relationships between Plaintiffs and ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 69: Please provide all documents that evidence, refer to or relate to any proposed or actual business relationships between Mr. Stephen Burns, or any company he controls, and ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 70: Please provide all documents that evidence, refer to or relate to any efforts to sell sand, gravel or fill dirt to ExxonMobil.

RESPONSE:

REQUEST FOR PRODUCTION NO. 71: Please provide all documents that evidence, refer to or discuss any efforts to provide gate guards to ExxonMobil for use at the Property, or any other location.

REQUEST FOR PRODUCTION NO. 72: Please provide all documents that evidence, refer to or relate to any efforts to generate income from the use of the surface of the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 73: Please provide all documents that reflect, refer, or relate to any alleged damages that Plaintiffs seek to recover herein.

RESPONSE:

REQUEST FOR PRODUCTION NO. 74: Please provide all documents sent to or received from any Plaintiffs in the Fire Cases.

RESPONSE:

REQUEST FOR PRODUCTION NO. 75: Please provide all documents that mention, refer to, or address alleged contamination of the Encinitos Ranch.

RESPONSE:

REQUEST FOR PRODUCTION NO. 76: Please provide all Letters of Consent relating to land farming operation on the Encinitos Ranch.

RESPONSE:

REQUEST FOR PRODUCTION NO. 77: Please provide all soil, water, or air samples or samples of any other substance obtained from anywhere on the Encinitos Ranch that you contend relates to the claims in the Petition.

RESPONSE:

REQUEST FOR PRODUCTION NO. 78: Please provide all tests and/or samples of groundwater located on or beneath the Encinitos Ranch.

RESPONSE:

REQUEST FOR PRODUCTION NO. 79: Please provide all tests and recorded measurements for radioactivity taken anywhere on the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 80: Please provide all samples and test results for any substances tested for PCBs taken from anywhere on the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 81: Please provide all communications with any former ExxonMobil employees, contractors, or attorneys.

RESPONSE:

REQUEST FOR PRODUCTION NO. 82: Please provide all entries to the website and/or blog located at <http://www.losranchosmalulos.com/> and/or <http://www.losranchosmalulos.blogspot.com/>. This includes any and all entries that have been deleted, revised, or modified in any manner.

RESPONSE:

REQUEST FOR PRODUCTION NO. 83: Please provide all historical edits to the website and/or blog located at <http://www.losranchosmalulos.com/> and/or <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE:

REQUEST FOR PRODUCTION NO. 84: Please provide all backup tapes or other stored data to the website and/or blog located at <http://www.losranchosmalulos.com/> and/or <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE:

REQUEST FOR PRODUCTION NO. 85: Please provide all agreements or contracts with the internet service provider for the website and/or blog located at <http://www.losranchosmalulos.com/> and/or <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE:

REQUEST FOR PRODUCTION NO. 86: Please provide all communications with any public relations firm hired by, retained by, consulted with by, and/or otherwise subject to the control of the Encinitos Ranch or any member of the Burns family who assists in managing and/or overseeing the ranch's operations relating to ExxonMobil or any other Defendant since 2000.

RESPONSE:

REQUEST FOR PRODUCTION NO. 87: Please provide all communications with any public relations firm hired by, retained by, consulted with by, and/or otherwise subject to the control of the Encinitos Ranch or any member of the Burns family who assists in managing and/or overseeing the ranch's operations relating to this lawsuit or the Fire Cases.

RESPONSE:

REQUEST FOR PRODUCTION NO. 88: Please provide all communications with the public relations firm referenced in the December 19, 2008 entry in the blog located at <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE:

REQUEST FOR PRODUCTION NO. 89: Please provide all communications and documents sent to "Tim" as referenced in the blog entry of September 7, 2008.

RESPONSE:

REQUEST FOR PRODUCTION NO. 90: Please provide all studies or reports of the flora and fauna of the Property done by the Nature Conservancy, or any other person or entity.

RESPONSE:

REQUEST FOR PRODUCTION NO. 91: Please provide all video tapes of the Property.

RESPONSE:

REQUEST FOR PRODUCTION NO. 92: Please provide all ExxonMobil policies, procedures, guidelines, or other documents in your possession, custody or control.

RESPONSE:

REQUEST FOR PRODUCTION NO. 93: Please provide all email exchanges or other documents exchanged with anyone who has commented on the blog located at <http://www.losranchosmalulos.blogspot.com/>.

RESPONSE: