

CAUSE NO. DC-24-19378

IN RE: THE 1975 RICHARD ROGERS
TRUST

RYAN ROGERS and TOLLESON
PRIVATE BANK,

Petitioners,

v.

RICHARD ROGERS, ET AL.

Respondents.

RICHARD R. ROGERS, individually
and as primary beneficiary of the Mary
Kay-Richard R. Rogers 1975 Trust,

Petitioner,

v.

RYAN T. ROGERS, individually and as
Personal trustee of the Mary Kay-
Richard R. Rogers 1975 Trust, and
TOLLESON PRIVATE BANK,
Individually and as corporate trustee of
The Mary Kay-Richard R. Rogers 1975
Trust,

Respondents.

IN THE 160th DISTRICT COURT

FOR

DALLAS COUNTY TEXAS

RICHARD R. ROGERS'S MOTION TO COMPEL PRODUCTION OF
RYAN T. ROGERS'S DOCUMENTS

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TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Richard R. Rogers (“*Richard*”), and files this Motion to Compel Production of Ryan T. Rogers’s Documents and respectfully shows the Court as follows:

I. PRELIMINARY STATEMENT

Richard has sought documents from Petitioner Ryan T. Rogers (“*Ryan*”) for years prior to this proceeding. But Ryan has evaded his discovery and disclosure obligations at every turn. **To date in this litigation, he has yet to produce a single document.** In response to Richard’s most recent requests for production (the “*Requests*,” and each, a “*Request*”), Ryan continues to stonewall. While Ryan has moved to compel swaths of documents spanning a twenty-five year period from Richard, he has wholly refused to produce over a dozen categories of documents requested by Richard, unilaterally and substantially narrowed his responses to the remainder of Richard’s Requests, and lodged a series of stock objections to each Request.

Ryan cannot continue to dodge Richard’s document requests. It is Ryan’s conduct—or misconduct—that is at issue in this action. Richard is unable to pursue his claims against Ryan and defend against Ryan’s claims without the discovery that he seeks. Richard’s requests are plainly relevant to the action and narrowly tailored. That is all Texas law requires.

The documents Ryan refuses to produce directly relate to Richard’s allegations regarding the Golden Rule investment structure that Ryan created to extract fees from Trust assets; the financial windfall Ryan has received from mismanaging the Trust; Ryan’s conflicts of interest; Ryan’s own claims regarding Richard’s family and advisors; and Ryan’s inequitable treatment of Richard, in comparison with himself and the other beneficiaries. Richard brings this Motion to Compel Ryan to produce the following categories of documents: (1) documents related to Golden Rule; (2) documents related to Ryan’s personal finances and conflicts of interest; (3) documents

related to Trust operations and communications; (4) documents related to Richard's family and advisors; and (5) documents related to Ryan's communications with the beneficiaries.

II. FACTUAL BACKGROUND

This case arises from Ryan's breach of his fiduciary duties as Personal Trustee of the Mary Kay – Richard R. Rogers 1975 Trust (the "*Trust*") and his aggressive litigation campaign to cover up a self-dealing scheme that has diverted millions from the Trust. The convergence of several factors precipitated this litigation: Richard's significant medical event in 2021 that required him to seek distributions for the first time in the Trust's history; Mary Kay, Inc.'s deteriorating financial condition under Ryan's mismanagement as CEO, resulting in declining dividends; and Ryan creating the Golden Rule investment structure to siphon a twenty-percent profits interest from Trust assets while concealing this arrangement from the Trust beneficiaries.

A. **Ryan Consolidates Power Over the Trust and Mary Kay**

In 1975, Mary Kay Ash established the Trust for the benefit of her son, Richard, as the Primary Beneficiary, and his lineal descendants. The Trust provides for distributions to be made according to the 'beneficiaries' needs for health, education, maintenance, and support—the "HEMS" standard—in their accustomed manner of living. *See* Am. Countercls. Ex. A § I ¶ A(1) ("Trustees are authorized . . . to pay the net income of each Trust to . . . the Primary Beneficiary . . . as . . . required or necessary for their health, education, support or maintenance in *their accustomed manner of living*, without regard to equality of distribution") (emphasis added).

Richard, who co-founded Mary Kay, Inc. (together with Mary Kay Holding Corporation, "*Mary Kay*"), is responsible along with his mother, the late Mary Kay Ash, for creating the family's wealth, much of which is held in the Trust. In 2012, Richard transferred his duties as

Personal Trustee to his son, Ryan, and appointed Tolleson Private Bank (“*Tolleson*”) as Corporate Trustee (together, the “*Trustees*”). Am. Countercls. ¶ 51.

Using his position as Personal Trustee, Ryan gained control over Mary Kay and subsequently had himself appointed as its CEO. Due to his mismanagement, dividends from the company, which Richard had relied on as his primary source of income for years, significantly declined in 2019-2022, and at the end of 2022, stopped entirely. *Id.* ¶ 7.

Ryan also used his power to consolidate control over the Trust’s assets and conceal the assets from the beneficiaries after Richard started making requests for a “catch up” distribution in 2021. At the end of 2021, Ryan created two entities, Golden Rule Management, LLC (“*GRM*”), and Golden Rule Investments, LP (“*GRI*” and together with GRM, “*Golden Rule*”). *Id.* ¶ 15. Golden Rule was purportedly created as a family office for the Mary Kay family to take advantage of certain tax benefits. *Id.* Ryan and Tolleson, as Trustees, transferred almost all of the liquid and investment assets held by the Trust and other Mary Kay family trusts (collectively the “*Trusts*”)—worth approximately \$1.6 billion—into GRI, with the Trusts receiving limited partnership interests in GRI in exchange. *Id.*

But Golden Rule had a very different purpose: to siphon the Trusts’ profits into Ryan’s control. The GRI Agreement included a provision—never disclosed to the beneficiaries of the Trust, other Mary Kay family trusts, or the Mary Kay Board—that gave Ryan *sole discretion* to distribute twenty percent of the Trusts’ profits. *Id.* ¶ 16. In 2023 alone, Ryan diverted nearly \$37 million from the Trusts. *Id.* To add insult to injury, Ryan provided the Mary Kay board of directors with incomplete and misleading information to gain board approval for Golden Rule and backdated board consent to effectuate an earlier approval date. *Id.* ¶ 17.

As Mary Kay's value plummeted under Ryan's control and shareholder dividends dried up, Richard experienced a major health crisis in 2021. *Id.* ¶ 10. Without dividend income from Mary Kay, which was Richard's primary source of income for decades, Richard was forced to draw down his personal savings to maintain the lifestyle to which he was accustomed to and pay for increased medical expenses associated with his age and health conditions. *Id.*

It was in this context—loss of dividend income, increasing health-related expenses, depletion of savings, and a major medical event—that Richard requested a “catch-up” distribution from the Trust. *Id.* This request was entirely consistent with the Trust's HEMS standard and with Richard's rights as the Trust's primary beneficiary. However, rather than work cooperatively with Richard to assess his needs and determine an appropriate distribution, Ryan and Tolleson took an adversarial stance. They demanded extensive financial information, questioned Richard's needs, and refused to make the requested distribution, despite the fact that Richard, as the primary beneficiary with legitimate health and maintenance needs, was entitled to receive it. *Id.* ¶¶ 11-15. And when litigation ensued and Richard attempted in good faith to settle the claims, Ryan and Tolleson violated their obligations under the Settlement Agreement. *Id.* ¶¶ 91-101.

B. Ryan Initiated This Litigation and Put the Documents Richard Seeks at Issue

Rather than address Richard's legitimate concerns about Trust management, Ryan initiated this lawsuit seeking declarations that would insulate his self-dealing from scrutiny and discharge him from liability for his breaches. *See* Second Am. Pet. The declaratory relief that Ryan seeks places squarely at issue the very topics he now refuses to produce documents about. Ryan cannot pretend these documents are not relevant and discoverable.

First, Ryan seeks a declaration that the “Trustees have appropriately discharged their fiduciary duties in managing the Trust assets, including actions in regard to GRI and GRM.” *Id.*

¶ 60(e). Ryan alleges that in late 2021, Mary Kay “formed Golden Rule Management LLC (‘GRM’) to create administrative ease and efficiencies in the management of the family trusts,” and that the Trust transferred assets to Golden Rule Investments, LP (“*GRI*”) in exchange for limited partnership interests. *Id.* ¶ 24. Ryan further alleges he “is the manager of GRM” and that “Richard is on the board of MKHC, received the presentation on GRM/*GRI*, and approved the establishment and funding of GRM/*GRI*.” *Id.* These allegations place every aspect of Golden Rule’s formation, structure, and operation at issue—including Ryan’s dual roles, the board approval process, capital transfers, and the twenty percent profit interest that Ryan controls as manager of GRM. Ryan’s request for a declaration that the Trustees appropriately discharged their fiduciary duties also necessarily places Trust administration and management at issue.

Second, Ryan alleges he made distributions to himself and other beneficiaries while claiming Richard never requested distributions until 2021. The Petition states that “between 2012 and 2020, the Trustees made total annual distributions ranging from 1.55 to 2.59% of the Trust corpus” to various beneficiaries. *Id.* ¶ 6. Ryan claims that “Today, Richard receives at least 70% of the monthly distributions of the Trust and the other thirteen beneficiaries split less than 30% of the monthly distributions.” *Id.* ¶ 8. These allegations necessarily put at issue Ryan’s distribution decisions, his financial conflicts of interest, and whether he favored himself and certain beneficiaries while excluding Richard—the primary beneficiary—from distributions during a period when Ryan knew MKHC dividends were declining.

Ryan further alleges that “the Co-Trustees owe fiduciary duties to all the beneficiaries, including the duties of loyalty and impartiality.” *Id.* Ryan’s duty of impartiality extends to whether as Trustee, he engages in disparate treatment of the beneficiaries. This places squarely at

issue Ryan's communications with the other Trust beneficiaries and whether Ryan has appropriately discharged this duty.

Third, Ryan repeatedly alleges that Richard lacks mental capacity and is subject to undue influence. The Petition alleges that the Trustees have "independent reasons to believe that Richard is not acting solely on his own volition" and seeks "an independent medical examination of Richard to determine his mental health and wellbeing." *Id.* ¶ 44. Ryan specifically alleges "undue influence by non-beneficiaries" and that "Richard is being unduly influenced by non-beneficiaries, into demanding large distributions." *Id.* ¶ 47.

Ryan goes further, alleging that "Nancy is frequently, if not always, present when Richard meets with the Trustees" despite not being a Trust beneficiary. *Id.* ¶ 49. The Petition describes an incident where "Richard appeared via zoom, and shortly after logging in, his camera was turned off and he was muted" and when asked a question, "his sound was muted for him, again." *Id.* Ryan also claims "sudden changes in Richard's advisors," including retention of "new, non-Dallas based attorneys," are evidence of undue influence. *Id.* ¶ 51. By making these inflammatory allegations, Ryan has placed Richard's relationships with Nancy and his advisors directly at issue. Documents regarding these individuals are essential to refuting Ryan's baseless claims.

Ryan also seeks a declaration that "the alleged adoption of Olivia Abbott is void and of no force or effect and, in any event, that she is not a beneficiary of the 1975 Trust." *Id.* ¶¶ 11(g), 60(g). Ryan alleges that "neither Richard nor his counsel informed the Trustees about the purported adoption of Olivia until well after it was done." *Id.* ¶ 53. Having challenged the validity of her adoption, Ryan cannot refuse to produce documents about her and her status as a beneficiary.

C. Ryan Refuses to Produce Relevant Documents in Response to Richard's Requests

Richard served his First Set of Requests for Production ("*Requests*" and each, a "*Request*") on Ryan on August 22, 2025. Ryan served his Objections and Responses to Richard's First Set of Requests for Production ("*Responses*") on September 22, 2025. Exhibit 1. In his Responses, Ryan objected to properly propounded Requests seeking relevant information and flatly refused to produce documents related to more than a dozen of Richard's Requests.

Moreover, in response to nearly *all* of Richard's Requests, Ryan agreed to produce only documents or communications sent in his capacity as a Trustee, sent between the Trust beneficiaries and the Trustees, sent between the Trustees, or related to Trust distributions and reimbursements—i.e., formal communications between select parties when expressly acting in certain capacities. *See, e.g.*, Ex. 1 at Response to Request No. 19 (response limited to documents and communications between Petitioner "in his capacity as Trustee of the Trust" and others); Response to Request No. 13 (response limited to "documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees").

Ryan also objected to and refused to produce relevant documents Richard needs to pursue his claims and defenses in this action: (1) documents related to Golden Rule, the complex structure at the core of Richard's breach of fiduciary duty claims through which Ryan improperly transferred assets; (2) documents related to Ryan's finances and compensation, which are essential to Richard's claims of conflicts of interest and self-dealing; (3) documents related to Ryan's administration of the Trust as Trustee, including his unequal treatment of beneficiaries; (4) documents related to individuals Ryan himself placed at issue, which are critical for Richard to defend against the improper claims of undue influence and attacks on the adoption of his daughter

Olivia; and (5) documents related to the settlement agreement, which Ryan and Tolleson sabotaged despite their contractual obligation to use “best efforts” to obtain beneficiary approval.

On October 17, 2025, Richard sent Ryan a letter explaining the deficiencies in Ryan’s responses under Texas law. Ryan did not respond. The parties have repeatedly met and conferred regarding document production, including on November 10, 2025. Ryan’s objections are improper, as Richard is entitled to documents that are relevant to his claims regarding the Trust and its relationships with its beneficiaries, including Ryan.

III. LEGAL STANDARD

“Discovery proceedings have as their aim and purpose the administration of justice by allowing the parties to obtain the fullest knowledge of issues and facts prior to trial.” *Imagine Auto. Grp. v. Boardwalk Motor Cars, Ltd.*, 430 S.W.3d 620, 644 (Tex. App.—Dallas 2014) (citation omitted); *In re Commitment of Young*, 410 S.W.3d 542, 550 (Tex. App. 2013); *In re Weir*, 166 S.W.3d 861, 864 (Tex. App. 2005). “[T]he ultimate purpose of discovery is . . . so that disputes may be decided by what the facts reveal, not by what the facts are concealed.” *Garcia v. Peebles*, 734 S.W.2d 343, 347 (Tex. 1987) (citation omitted). Accordingly, the reach of discovery is broad, extending to “any matter that is not privileged and is relevant to the subject matter of the” case. Tex. R. Civ. P. 192.3(a); *In re N. Cypress Med. Ctr. Operating Co.*, 559 S.W.3d 128, 129 (Tex. 2018) (“Our procedural rules allow broad discovery . . .” (quoting Tex. R. Civ. P. 192.3(a))).

“The rules of procedure provide that the scope of discovery includes *any unprivileged information that is relevant to the subject of the action*, even if it would be inadmissible at trial, as long as the information sought appears ‘reasonably calculated to lead to the discovery of admissible evidence.’” *In re Exmark Mfg. Co., Inc.*, 299 S.W.3d 519, 525 (Tex. App.—Corpus Christi-Edinburg 2009) (quoting Tex. R. Civ. P. 192.3(a)) (emphasis added); *see also In re Nat’l*

Lloyds Ins. Co., 532 S.W.3d 794, 808 (Tex. 2017) (same); *Eli Lilly & Co. v. Marshall*, 850 S.W.2d 155, 160 (Tex. 1993) (same). “The phrase ‘relevant to the subject matter’ is to be ‘*liberally construed*’ to allow the litigants to obtain the fullest knowledge of the facts and issues prior to trial.” *Ford Motor Co. v. Castillo*, 279 S.W.3d 656, 664 (Tex. 2009) (citing *Axelson, Inc. v. McIlhany*, 798 S.W.2d 550, 553 (Tex. 1990)) (emphasis added); *see also In re K&L Auto Crushers, LLC*, 627 S.W.3d 239, 248 (Tex. 2021) (same); *In re Nolle*, 265 S.W.3d 487, 492 (Tex. App.—Houston [1st Dist.] 2008) (noting “[a] reasonably tailored discovery request is not overbroad merely because it may include some information of doubtful relevance” and “[t]he Texas Supreme Court has specifically recognized that parties must be allowed some latitude in creating discovery requests” (citation omitted)).

A party objecting to any discovery request “must state specifically the legal or factual basis” for any objection and “the extent to which the party is refusing to comply with the request.” Tex. R. Civ. P. 193.2(a). Objections that “fail[] to clearly identify the specific matters and discovery requests that they contend are irrelevant or overbroad . . . and explain the basis for those contentions” are insufficient. *In re Alford Chevrolet-Geo*, 997 S.W.2d 173, 185 (Tex. 1999); *see also In re Marshall*, 617 S.W.3d 670, 675 (Tex. App.—San Antonio 2021) (finding abuse of discretion where trial court sustained an overbreadth objection to a discovery request that did not “provide a valid basis for its overly broad objection”). Objections may be made only if a good faith factual and legal basis exists for the objection. Tex. R. Civ. P. 193.2(c). An objection “that is obscured by numerous unfounded objections, is waived.” Tex. R. Civ. P. 193.2(e).

IV. ARGUMENT

In response to each of Richard’s Requests, Ryan lodges stock objections and refuses to produce any responsive documents or significantly narrows the scope of the request before

agreeing to produce. Ryan's refusal to produce *over a dozen* relevant categories of documents without any valid or specific basis for objecting is unwarranted and violates Texas law. *See* Ex. 1, 4-60. Moreover, Ryan's attempts to limit his production to documents he possesses in certain capacities, but not others, is arbitrary and untenable. Richard respectfully requests that Ryan be compelled to produce *all* relevant and non-privileged documents responsive to Richard's requests, which are critical to Richard's ability to defend against Ryan's claims and pursue his own.

A. Ryan's Narrowing to Trustee Documents Is Unjustified

In response to nearly *all* of Richard's Requests to which he agreed to produce documents, Ryan purports to limit his production to only documents or communications sent in his capacity as a Trustee, sent between the Trust beneficiaries and the Trustees, sent between the Trustees, or related to Trust distributions and reimbursements. This narrowing is entirely unjustified.

"A response must fairly meet the substance of the request. [] The responding party may qualify an answer, or deny a request in part, only when good faith requires." *In re Sting Soccer Grp. LP*, 2017 WL 5897454, at *8 (Tex. App.—Dallas 2017). Therefore, it is Ryan's burden to "establish[] the alleged overbreadth of the information ordered produced." *In re Exmark Mfg. Co.*, 299 S.W.3d at 525. Ryan "has not met [this] burden." *Id.* Nor can he. Richard's Requests are narrowly tailored, both in time frame and subject matter. *See* Request Instruction 5 ("Unless otherwise stated herein, all Documents requested are for the period commencing January 1, 2019, up to and including the present."). That they are not limited to Ryan's capacity as a Trustee or documents and communications related to the Trust and/or Trust distributions does not render them overbroad.

Indeed, Richard’s counterclaim, which was answered without objection by Ryan, names Ryan in various capacities, including individually, as Trustee, as Manager of GRM, and as CEO of Mary Kay. *See* Am. Countercls. at ¶ 22. Richard’s counterclaims specifically allege actions Ryan took in each of those capacities. *See id.* ¶ 54 (“While serving as Co-Trustee, Ryan personally received nearly \$74 million in distributions from the Richard R. Rogers Trust between 2012 and 2022—more than any other beneficiary.”); *id.* ¶ 79 (“Ryan transferred the Family Trust funds to GRI and funded it with millions of MKHC dollars at the end of 2021.”); *id.* (“Ryan had already transferred the Family Trust assets to GRI months before the MKHC Board ‘approved’ the creation and funding of GRM.”).

Therefore, the documents and communications that Ryan sent or received in his capacity as CEO of Mary Kay, as Director of Mary Kay, as Manager of Golden Rule, as a beneficiary of the Trust, and even those responsive documents sent in his personal capacity are relevant to—and likely *probative* of—Richard’s counterclaims. The question is not which hat Ryan was wearing when he made a communication, but rather, whether the subject matter of the communication is relevant to and/or reasonably calculated to lead to the discovery of admissible evidence in this action. This means that even if Ryan texts a friend in his personal capacity regarding his treatment of Richard, such texts are responsive to this action. So long as a document or communication is responsive to Richard’s requests, it is discoverable, regardless of whether Ryan claims the communication was sent in his “capacity” as Trustee, or some other capacity.

Accordingly, Ryan should be compelled to produce documents and communications responsive to all of Richard’s Requests as set forth below, without his unilaterally imposed artificial limitations.

B. Richard's Requested Documents Are Relevant and Discoverable

1. Documents Related to Golden Rule Are Relevant and Discoverable

Richard's Requests seek information that go to the heart of his breach of fiduciary duty claims: The self-dealing Golden Rule scheme that Ryan set up to siphon profits from the Trust.

These include three critical requests:

- **Request No. 14:** "All Documents and Communications related to Golden Rule, including but not limited to:" documents and communications related to its "formation and operation," "MKHC's approval of Golden Rule," "capital contributions made by MKHC," "the Trust's investment in Golden Rule," "payments from Golden Rule to [Ryan]," "payments or capital transfers from GRI to GRM or vice versa," "policies or procedures related to Golden Rule," "tax or accounting advice . . . related to Golden Rule," "Golden Rule investments," "reimbursements owed to Golden Rule," "expenses incurred by Golden Rule," and "audits of Golden Rule."
- **Request No. 40:** "All Documents or Communications related to Golden Rule's financial records, including but not limited to general ledgers, balance sheets, Profit and Loss Statements, asset lists, tax returns, K-1s, 1099s, bank statements, investment statements, and other financial records."
- **Request No. 42:** "All Documents or Communications related to administrative records of GRM and GRI, including but not limited to annual meeting minutes, resolutions, unanimous consents, reports of officers, directors, managers, or partners."

Ryan has refused to provide documents responsive to those Requests or, without justification, has agreed to provide only a narrow subset of the information requested. In response to Request No. 14, Ryan makes myriad objections, including on the basis of overbreadth, relevance, and documents purportedly being outside of his possession, custody, and control, and in some cases agreed to produce documents regarding GRI but not GRM. Ex. 1 at 21-25. In response to Request No. 40, Ryan objects on multiple bases, including relevance, and refuses to produce documents related to GRM. *Id.* at 58. In response to Request No. 42, Ryan makes similar objections, claiming that "there are no administrative records kept for GRI," and refuses to produce such documents related to GRM. *Id.* at 59.

Richard's Requests related to Golden Rule, both GRI and GRM, are relevant to this litigation because Golden Rule is at the core of both parties' allegations: Ryan seeks to have the Court declare that the "Trustees have appropriately discharged their fiduciary duties in managing the Trust assets, including actions in regard to GRI and GRM," Second Am. Pet. ¶ 60(e), while Richard alleges that Ryan created the Golden Rule scheme by transferring Trust assets to it so that he could extract profits for himself. *See* Am. Countercls. ¶ 85; *see id.* ¶¶ 15-18, 73-85 (alleging that Ryan "transferred the Family Trust assets to GRI" and that "Golden Rule pays Ryan and Tolleson millions of dollars annually").

The documents that Richard requests are essential to understanding the flow of capital between the Trust and Golden Rule entities, the payment structure that benefits Ryan, and the mechanics of this self-dealing arrangement. Without access to Golden Rule's formation documents, financial records, and administrative materials, Richard cannot trace the Trust assets, evaluate the propriety of the fee arrangements, or evaluate how Ryan uses his overlapping roles to benefit himself at the expense of Trust beneficiaries. The documents that Richard seeks are thus relevant to both parties' claims. *See In re Exmark Mfg. Co.*, 299 S.W.3d at 525 (scope of discovery includes "any unprivileged information that is relevant to the subject of the action").

Ryan's objections that these requests are overly broad or seek documents outside his possession, custody, or control lack merit. The Texas Rules of Civil Procedure require Ryan to state specifically the legal or factual basis for any objection and the extent to which he is refusing to comply with the request. Tex. R. Civ. P. 193.2(a). Objections that "fail[] to clearly identify the specific matters and discovery requests that they contend are irrelevant or overbroad . . . and explain the basis for those contentions" are insufficient. *In re Alford Chevrolet-Geo*, 997 S.W.2d

at 185. Insofar as Ryan does not once explain the basis for his overbreadth objections, his objections are insufficient and he should be compelled to produce responsive documents.

Moreover, the documents that Richard requests are undeniably within Ryan's possession, custody, and control. Ryan created Golden Rule, serves as GRM's manager, and controls its operations. Documents regarding an entity he manages are plainly within his control. "Rule 167 permits a party to request another party to produce any designated document within its possession, custody, or control," and the party responding to the request is "required" to do so. *Texaco, Inc. v. Dominguez*, 812 S.W.2d 451, 453 (Tex. App.—San Antonio 1991) (citing Tex. R. Civ. P. 167(1)(a)); *see also In re Summersett*, 438 S.W.3d 74, 82 (Tex. App.—Corpus Christi-Edinburg 2013) (affirming order compelling production of company's documents from CEO and holding those documents were in CEO's possession, custody, and control). "Ryan's controlling interest in these businesses and his [] possession of the documents" weigh in favor of granting Richard's motion to compel. *Valley Forge Ins. Co. v. Jones*, 733 S.W.2d 319, 322 (Tex. App.—Texarkana 1987) (holding that "the trial court erred in failing to compel production of the documents sought").

Further, Ryan's assertion that GRI maintains no administrative records for a \$1.6 billion investment vehicle strains credulity. Nor can he refuse to produce documents for GRM, which are relevant for the reasons explained above. Both GRI and GRM are part of the Golden Rule scheme, and Ryan should be required to produce documents regarding those entities.

2. Documents Related to Ryan's Finances and Conflicts of Interest Are Relevant and Discoverable

Richard makes multiple Requests seeking information regarding Ryan's personal finances and conflicts of interest:

- **Request No. 17:** "All Documents and Communications related to Your personal finances."

- **Request No. 19:** “All Documents and Communications related to any conflicts of interest between Your role as Trustee of the Trust and Your roles at Mary Kay, MKHC, or Golden Rule.”
- **Request No. 21:** “All Documents and Communications related to Your compensation from any source for the past five years.”
- **Request No. 23:** “All Documents and Communications related to Your personal use of any assets owned by the Trust, Mary Kay, MKHC, or Golden Rule.”
- **Request No. 46:** “All Documents or Communications related to any payment, compensation, or other benefits received by any Director on the Board of Mary Kay or MKHC.”

Ryan has refused to provide documents responsive to those Requests or, without justification, has agreed to provide only a narrow subset of the information requested. In response to Request No. 17, Ryan asserts objections based on overbreadth, relevance, undue burden, vagueness, and privilege, and refuses to produce responsive documents. Ex. 1 at 26-27. In response to Request No. 19, Ryan asserts similar objections and only agrees to produce documents made in his capacity as a Trustee or that relate to the Trust. *Id.* at 30. In response to Request No. 21, Ryan asserts that he “does not receive any compensation as Trustee . . . , so there are no responsive documents to this Request.” *Id.* at 33. In response to Request 23, Ryan asserts that “[n]either the Trust nor GRI owns any assets nor do they pay any personal expenses, so there are no responsive documents to this Request.” *Id.* at 35-36. In response to Request No. 46, Ryan asserts an overbreadth objection and states that such documents are not within his possession and that he will not produce any. *Id.* at 60.

Richard’s requests regarding Ryan’s finances and conflicts of interest are relevant to this litigation because they directly support Richard’s allegations that Ryan has breached his fiduciary duties through self-dealing and exploitation of conflicts of interest. Richard alleges that Ryan received nearly \$74 million in distributions from the Trust between 2012 and 2022—more than any other beneficiary—while simultaneously receiving compensation as CEO of Mary Kay and

controlling Golden Rule’s twenty percent profits interest. Am. Countercls. ¶ 16-17, 54. Richard also alleges that Ryan used Golden Rule to “siphon the profits of the Family Trusts into Ryan’s control[.]” *Id.* ¶ 16. Understanding Ryan’s complete financial picture, including his assets, income from all sources, and personal use of Trust or corporate assets, is essential to proving whether Ryan’s decisions as Trustee were motivated by self-interest rather than the beneficiaries’ best interests. Documents regarding conflicts of interest policies, disclosures, and recusals are relevant given Richard’s allegations that Ryan used his dual positions to provide incomplete and misleading information to the MKHC Board to secure approval for Golden Rule while concealing the profits interest provision that benefits him personally. *See id.* (“The GRI Agreement included a provision—never disclosed to the beneficiaries of the Family Trusts or MKHC Board—that gave Ryan *sole* discretion to distribute 20% of the profits obtained by the Family Trusts. In 2023 alone, the profits Ryan diverted from the Trusts totaled nearly \$37 million.”).

Ryan cannot demand complete financial transparency from Richard—including invasive inquiries into Richard’s assets, income, expenses, medical care, and even information about Richard’s wife Nancy who is not a party to this action—while refusing to provide similar information himself. This is particularly true when Ryan, unlike Richard, serves in a fiduciary capacity as Trustee. *See In re Estate of Wallis*, 2010 WL 1987514, at *5 (Tex. App.—Tyler 2010) (“*Bright v. Addison*, 171 S.W.3d 588, 597 (Tex. App.—Dallas 2005, pet. denied) (stating that fiduciary has affirmative duty to make full and accurate confession of all fiduciary activities, transactions, profits, and mistakes); *Ball v. Posey*, 176 Cal. App. 3d 1209, 222 Cal. Rptr. 746, 749 (Cal. Ct. App. 1986) (noting that trustee, as fiduciary, has affirmative duty to render full and fair disclosure to beneficiary of all facts that materially affect his rights and interests and that this duty was an affirmative one)[.]”). Further, the existence of litigation against the Trustee does not negate

their duties of disclosure, which exist independently of the rules of discovery. *See Huie v. DeShazo*, 922 S.W.2d 920, 923 (Tex. 1996).

Ryan's objections that these requests are overly broad or seek documents outside his possession, custody, or control are without merit. As previously explained, the Texas Rules of Civil Procedure require Ryan to state specifically the legal or factual basis for any objection and the extent to which he is refusing to comply with the request. Tex. R. Civ. P. 193.2(a). Objections that "fail[] to clearly identify the specific matters and discovery requests that they contend are irrelevant or overbroad . . . and explain the basis for those contentions" are insufficient. *In re Alford Chevrolet-Geo*, 997 S.W.2d 173, 185 (Tex. 1999). Insofar as Ryan does not explain the basis for his overbreadth objections, his objections are insufficient and he should be compelled to produce responsive documents.

Ryan's objection that Requests Nos. 17 and 46 seek information outside his possession, custody, or control as Trustee is meritless because he is being asked to produce documents regarding his own personal finances and compensation, which are plainly within his control. *See Valley Forge Ins. Co.*, 733 S.W.2d at 322 (determining that the trial court should have compelled production because of "Ryan's controlling interest in these businesses and his possession of the documents"); *see also Texaco, Inc.*, 812 S.W.2d at 453 (explaining that Rule 167 permits a party to request production of any document within that party's "possession, custody, or control[]"); *In re Christus Health Se. Tex.*, 399 S.W.3d 343, 345 (Tex. App.—Beaumont 2013, orig. proceeding) (same).

Ryan responds to Requests Nos. 21 and 23 by impermissibly narrowing them and then claiming that no responsive documents exist. In doing so, he ignores the broader scope of the Requests, which seek information about all forms of compensation and benefits he receives from

entities whose interests overlap with the Trust, and his personal use of assets owned by entities whose interests overlap with the Trust, including Mary Kay and MKHC. Richard seeks documents regarding Ryan's compensation and benefits received from entities overlapping with the Trust in order to corroborate his claims of self-dealing by Ryan. Richard also seeks documents regarding Ryan's personal use of assets to corroborate his claims regarding Ryan's breaches of fiduciary duty. Accordingly, Ryan should be compelled to produce documents responsive to these Requests.

3. Documents Reflecting Trust Operations and Communications Are Relevant and Discoverable

Richard has made multiple Requests seeking information relevant to operations and administration of the Trust:

- **Request No. 12:** "All Documents and Communications related to Your voting of stock owned by the Mary Kay Family Trusts and Your appointment as CEO of Mary Kay."
- **Request No. 13:** "All Documents and Communications related to Mary Kay's financial health and MKHC's financial health."
- **Request No. 26:** "All Documents and Communications related to any Trust investments."

Ryan has refused to provide documents responsive to those Requests or, without justification, has agreed to provide only a narrow subset of the information requested. Ryan objects to Requests Nos. 12 and 13 on the grounds that they are overly broad, not relevant, and seek documents outside of his possession, ultimately concluding that he will not produce responsive documents. Ex. 1 at 19-21. In response to Requests No. 26, Ryan likewise objects based on overbreadth, relevance, and undue burden, and only agrees to produce certain Trust-related documents. *Id.* at 38-40.

Documents regarding Ryan's appointment as CEO and his voting of Trust-owned stock are relevant to Richard's allegations that Ryan's dual positions have created conflicts allowing him to control the creation and funding of Golden Rule. *See, e.g.,* Am. Countercls. ¶ 79 ("In May 2022,

the Board of MKHC passed a consent approving the creation and funding of Golden Rule based on representations by Ryan that Golden Rule would be advantageous to MKHC and its shareholders.”); *id.* ¶ 82 (“[A]t the time MKHC’s Board voted in favor of Golden Rule’s creation, Ryan had already created and funded GRM with millions of MKHC dollars, and he had transferred the Family Trust assets to GRI.”). Ryan’s use of voting stock is also relevant to his management and oversight of trust assets. Mary Kay stock is one of the Trust’s major assets; how Ryan votes these shares and whether such actions may breach his fiduciary duty to shepherd and protect the Trust’s assets are directly relevant to Richard’s claims.

Documents relating to Mary Kay’s and MKHC’s financial health are relevant because understanding the companies’ performance is essential to evaluating whether the Trustees’ distribution and investment decisions were prudent and whether they breached their fiduciary duties to the beneficiaries. *Id.* ¶ 59 (“Beginning around the end of 2019, [] dividends to MKHC shareholders dramatically decreased and then stopped entirely, eliminating Richard’s primary source of income necessary for his health and maintenance in his accustomed manner of living, at a time when Richard’s needs were increasing due to his age and medical conditions. Ryan, as CEO of MKHC and Trustee of the Richard R. Rogers Trust, and Tolleson, as Trustee of the Family Trusts that received MKHC dividends, were aware of the significantly reduced dividends, but this apparently did not affect their distribution decisions from the Family Trust to Ryan and the other beneficiaries, or cause them to inquire about Richard’s needs in light of these significantly changed circumstances.”) Whether Ryan’s and Tolleson’s decisions were breaches of their duties is dependent in part on their understanding of the companies’ current and projected financial health and its impact on the Trust’s financial health.

Documents related to Trust investments are relevant because they reflect the health of the Trust, Ryan's effectiveness as Trustee, and the appropriateness of the distributions that the beneficiaries and Ryan are receiving. These questions, in turn, relate to Richard's allegations concerning Ryan's exercise or breach of his fiduciary duties in executing his role as Trustee. *See, e.g., id.* ¶ 15 ("Ryan and Tolleson, as Trustees, transferred almost all of the liquid and investment assets held by the Family Trusts—worth approximately \$1.6 billion—into GRI, with the Trusts receiving limited partnership interests in GRI in exchange.").

Ryan's objections that these Requests are overly broad or seek documents outside his possession, custody, or control lack merit. As previously explained, the Texas Rules of Civil Procedure require Ryan to articulate the specific legal or factual basis for any objection and the extent to which he is refusing to comply with the request. Tex. R. Civ. P. 193.2(a). Objections that "fail[] to clearly identify the specific matters and discovery requests that they contend are irrelevant or overbroad . . . and explain the basis for those contentions" are insufficient. *In re Alford Chevrolet-Geo*, 997 S.W.2d at 185. Insofar as Ryan does not explain the basis for his overbreadth objections, his objections are insufficient.

Ryan's objection that the requested documents are outside his possession, custody, or control as Trustee fails given his simultaneous role as Mary Kay's CEO. Relevant documents he possesses in any capacity must be produced. *See Valley Forge Ins. Co.*, 733 S.W.2d at 321 ("Ryan's controlling interest in these businesses and his [] possession of the documents" require "production of the documents sought").

4. Documents Related to Richard's Family and Advisors Are Relevant and Discoverable

Certain of Richard's Requests related to his family members or advisors seek information that Ryan, himself, put at issue:

- **Request No. 29:** “All Documents and Communications related to Olivia Abbott.”
- **Request No. 30:** “All Documents and Communications related to Nancy Rogers.”
- **Request No. 31:** “All Documents and Communications related to Warren Lichtenstein.”
- **Request No. 32:** “All Documents and Communications related to Keith Bloomfield.”

Ryan has refused to produce documents or communications responsive to these Requests, citing overbreadth, lack of relevance, undue burden, and privilege. Ex. 1 at 40-42.

Richard now moves to compel documents and communications responsive to Requests Nos. 29, 30, 31, and 32 as they relate to this lawsuit, Trust administration, and Trust distributions. Ryan’s blanket refusal to produce any documents regarding these individuals is particularly egregious given that Ryan and Tolleson, themselves, named Olivia Abbott as a Respondent in this litigation and challenge the validity of her adoption. Second Am. Pet. ¶ 14(o) (naming Olivia as a “Respondent”); *id.* ¶ 60(g) (“The alleged adoption of Olivia Abbott is void and of no force or effect and, in any event, that she is not a beneficiary of the 1975 Trust.”). Ryan cannot make claims against Olivia and then refuse to produce documents related to her on relevance grounds. “The plaintiff has the burden of coming forward with proof to support the allegation.” *Cass v. Stephens*, 156 S.W.3d 38, 64 (Tex. App.—El Paso 2004). Ryan is obligated to produce discovery on this issue to support his allegations regarding Olivia.

Documents regarding Nancy Rogers are directly relevant to proving the Trustees’ improper demands for financial information. Richard alleges that the Trustees threatened to decrease or eliminate his distributions unless both Richard and Nancy—who is not a beneficiary—provide “invasive and irrelevant financial information that the Trustees have wrongfully demanded.” Am. Countercls. ¶ 113; *see also id.* ¶¶ 2, 106, 127. Any documents regarding Nancy are essential to understanding the scope and propriety of these demands. Petitioners also make allegations about

Nancy in their Petition, rendering discoverable their documents on the topic. *See* Second Am. Pet. ¶¶ 7-8, 36, 48-50, 52; *Cass*, 156 S.W.3d at 64; *In re Exmark Mfg. Co.*, 299 S.W.3d at 525.

Warren Lichtenstein (“*Warren*”) is expressly referenced in the Settlement Agreement, which entitled Richard to retain Warren as his “advisor regarding MKHC Board matters” with Ryan agreeing not to interfere. Am. Countercls. Ex. G ¶ 6(b). Documents regarding Warren are relevant to whether the Trustees breached their obligations under the Settlement Agreement and whether they interfered with Warren’s role. Similarly, Ryan, himself, sought discovery regarding Keith Bloomfield (“*Keith*”) in his requests to Richard, establishing the relevance of such documents. Ryan cannot claim entitlement to discovery regarding Keith while refusing reciprocal production. *See In re Exmark Mfg. Co.*, 299 S.W.3d at 525 (“The rules of procedure provide that the scope of discovery includes ***any unprivileged information that is relevant to the subject of the action***, even if it would be inadmissible at trial, as long as the information sought appears ‘reasonably calculated to lead to the discovery of admissible evidence.’”).

Ryan’s objections that these requests are overly broad are without merit. As previously explained, the Texas Rules of Civil Procedure require Ryan to state specifically the legal or factual basis for any objection and the extent to which he is refusing to comply with the request. Tex. R. Civ. P. 193.2(a). Objections that “fail[] to clearly identify the specific matters and discovery requests that they contend are irrelevant or overbroad . . . and explain the basis for those contentions” are insufficient. *In re Alford Chevrolet-Geo*, 997 S.W.2d 173, 185 (Tex. 1999). Insofar as Ryan does not explain the basis for his overbreadth objections, his objections are insufficient and he should be compelled to produce responsive documents.

On November 10, 2025, Ryan stated that he would produce non-privileged documents and communications responsive to these Requests that relate to this lawsuit, Trust administration, and

Trust distributions, and stated that they would memorialize that in writing. Once Ryan provides this memorialization to Richard, Richard acknowledges that this issue will be moot.

5. Documents Related to Communications with Beneficiaries Are Relevant and Discoverable

Richard has made multiple Requests seeking information relevant to communications with beneficiaries:

- **Request No. 37:** “All Documents or Communications sent to or received from any Trust beneficiary related to the claims asserted in this Action.”
- **Request No. 38:** “All Documents or Communications sent to or received from any Trust beneficiary or third party related to the Settlement of the claims asserted in this Action.”

Ryan has responded that he will “not produce any documents or communications in response to th[ese] Request[s],” citing overbreadth, lack of relevance, privilege, and calls for a legal determination. Ex. 1 at 57-58.

Documents or communications with beneficiaries related to the claims asserted in this action is critical to Richard’s ability to establish his allegations that Ryan treated him differently than the other beneficiaries, and critical to his ability to disprove Ryan’s claims that he treated Richard equitably. Am. Countercls. ¶ 59 (“Ryan . . . and Tolleson . . . were aware of the significantly reduced dividends, but this apparently did not affect their distribution decisions from the Family Trust to Ryan and the other beneficiaries, or cause them to inquire about Richard’s needs in light of these significantly changed circumstances.”); *id.* ¶ 62 (“The Trustees’ egregious partiality towards Ryan, as well as against Richard and the other beneficiaries, is a violation of the Trust’s mandate to not ‘arbitrarily take any action which would favor one beneficiary or group of beneficiaries over any other beneficiary or group of beneficiaries.’”).

Documents and communications with beneficiaries or third parties regarding the settlement are essential to proving whether the Trustees fulfilled their contractual obligations and fiduciary

duties, or whether they acted in bad faith to prevent settlement. These documents will reveal any statements the Trustees made to obtain beneficiary approval, what they communicated to beneficiaries about the settlement, and whether they worked to sabotage the agreement. *See id.* ¶¶ 95-101.

Ryan's objections that these requests are overly broad are without merit. As previously explained, the Texas Rules of Civil Procedure require Ryan to state specifically the legal or factual basis for any objection and the extent to which he is refusing to comply with the request. Tex. R. Civ. P. 193.2(a). Objections that "fail[] to clearly identify the specific matters and discovery requests that they contend are irrelevant or overbroad . . . and explain the basis for those contentions" are insufficient. *In re Alford Chevrolet-Geo*, 997 S.W.2d at 185. Insofar as Ryan does not once explain the basis for his overbreadth objections, his objections are insufficient and he should be compelled to produce responsive documents.

Ryan's blanket assertion of privilege over communications with third parties, including beneficiaries, likewise lacks merit. Communications with third parties generally are not privileged. *In re Burroughs*, 203 S.W.3d 858, 860 (Tex. App.—Beaumont 2006) ("Documents that have been disclosed to third parties are generally not confidential communications within the meaning of the attorney-client privilege. See Tex. R. Evid. 503(a)(5)."); *In re Topletz*, 2020 WL 6073877, at *1 (Tex. App.—Dallas Oct. 15, 2020) (same). To the extent Ryan claims privilege over any specific communications, he must provide a detailed privilege log rather than making blanket objections and provide such documents to the court for in-camera inspection regarding any claimed privilege. His complete refusal to produce any documents regarding settlement discussions with beneficiaries or third parties, despite the Settlement Agreement's explicit requirements for such communications, evidences bad faith and warrants an order compelling

production. Moreover, identification of settlement communications does not call for a legal, but rather, a factual determination that can and must be done by Ryan.

V. CONCLUSION & PRAYER

WHEREFORE, PREMISES CONSIDERED, Richard respectfully requests that this Court grant his Motion to Compel, overrule Ryan's objections that are incorporated in his Responses and Objections to Richard's First Set of Requests for Production, compel Ryan to fully and completely respond to the aforementioned discovery requests and provide responsive documents, and grant all such other and further relief to which he may be justly entitled.

Dated: November 11, 2025

Respectfully submitted,

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Attorneys for Richard R. Rogers

CERTIFICATE OF CONFERENCE

I hereby certify that a reasonable effort has been made to resolve the discovery dispute without the necessity of court intervention. I certify that on or about November 10, 2025, I conferred with Ryan Rogers's counsel via Zoom regarding the inadequate discovery responses, insupportable objections, and lack of substantive document production. Ryan's counsel indicated that he was opposed to this motion.

/s/ Chad T. McLain
Chad T. McLain

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document on the parties in the within action, via e-mail, on November 11, 2025.

/s/ Chad T. McLain

Chad T. McLain

CAUSE NO. DC-24-19378

IN RE: THE 1975 RICHARD ROGERS
TRUST

RYAN ROGERS and TOLLESON
PRIVATE BANK,

Petitioners,

v.

RICHARD ROGERS, ET AL.

Respondents.

IN THE 160th DISTRICT COURT

FOR

RICHARD R. ROGERS, individually
and as primary beneficiary of the Mary
Kay-Richard R. Rogers 1975 Trust,

Petitioner,

v.

RYAN T. ROGERS, individually and as
Personal trustee of the Mary Kay-
Richard R. Rogers 1975 Trust, and
TOLLESON PRIVATE BANK,
Individually and as corporate trustee of
The Mary Kay-Richard R. Rogers 1975
Trust,

Respondents.

DALLAS COUNTY TEXAS

**PETITIONER RYAN T. ROGERS'S OBJECTIONS AND RESPONSES TO
RESPONDENT RICHARD R. ROGERS'S FIRST REQUESTS FOR PRODUCTION**

To: Respondent Richard R. Rogers, by and through his attorneys of record, Thomas M. Melsheimer and Thomas B. Walsh, Winston & Strawn LLP, 2121 N. Pearl Street, Suite 900, Dallas, Texas 75201, Larry A. Flournoy, Jr., Chad T. McLain, and Alexandra N. Bradford, Flournoy McLain, P.C. 10000 N. Central Expressway, Suite 800, Dallas, Texas 75231, and Andrew J. Rossman, Peter H. Fountain, K. McKenzie Anderson, and Morgan L. Anastasio, Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010.

Petitioner Ryan T. Rogers ("Petitioner") hereby serves these objections and responses to Respondent Richard Rogers's ("Respondent") First Set of Requests for Production.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

1. Petitioner objects to Respondent's definition of the term "Document" to the extent it requires the production of "databases, including metadata" in full, as that definition exceeds the scope of production that the Texas Rules of Civil Procedure require.

2. Petitioner objects to the Respondent's requested production of all ESI. Petitioner will instead propose a mutually agreeable ESI protocol.

3. Petitioner objects to Respondent's definition of the term "GRI" because Respondent's definition is overly broad and ostensibly seeks documents from third parties. In responding to Respondent's Requests, Petitioner deems "GRI" to mean Golden Rule Investments, LP itself and its agents, if any.

4. Petitioner objects to Respondent's definition of the term "GRM" because Respondent's definition is overly broad and ostensibly seeks documents from third parties. In responding to Respondent's Requests, Petitioner deems "GRM" to mean Golden Rule Management, LLC itself and its agents, if any.

5. Petitioner objects to Respondent's definition of "Mary Kay" because Respondent's definition is overly broad and ostensibly seeks documents from third parties. In responding to Respondent's Requests, Petitioner deems "Mary Kay" to mean Mary Kay Inc. itself, as well as Mary Kay Inc.'s employees, directors, and officers.

6. Petitioner objects to Respondent's definition of "metadata" as overly broad and unduly burdensome. Petitioner will instead propose a mutually agreeable ESI protocol that contains a reasonable definition of the term "metadata."

7. Petitioner objects to Respondent's definition of "MKHC" because Respondent's definition is overly broad and ostensibly seeks documents from third parties. In responding to Respondent's Requests, Petitioner deems "MKHC" to mean Mary Kay Holding Corporation itself, as well as Mary Kay Holding Corporation's employees, directors, and officers.

8. Petitioner objects to Respondent's definition of "Ryan," "You," and "Your" because Respondent's definition is overly broad, unduly burdensome, and ostensibly seeks documents from third parties. In responding to Respondent's Requests, Petitioner deems "Ryan," "You," and "Your" to mean only Ryan T. Rogers himself.

9. Petitioner objects to Respondent's definition of "Tolleson" because Respondent's definition is as overly broad and ostensibly seeks documents from third parties. In responding to Respondent's Requests, Petitioner deems "Tolleson" to mean Tolleson Private Bank itself, as well as Tolleson Private Bank's employees, directors, and officers.

10. Petitioner objects to Respondent's definition of "any reference to an organization or other legal entity" as overly broad and unduly burdensome to the extent Respondent's definition seeks to encompass virtually any person who may have had any association, however remote, with any referenced "organization" or "other legal entity."

11. Petitioner objects to Respondent's definition of "natural person" as overly broad and unduly burdensome to the extent Respondent's definition purports to extend a reference to any natural person to include an unlimited universe of employees, agents, advisors, professionals, or other persons allegedly acting on that individual's behalf.

12. Petitioner objects to all Respondent's purported "Instructions" to the extent they purport to impose obligations inconsistent with the requirements of Texas law or local rules. Specifically, but not limited to, the following:

- a. Petitioners object to the method and manner of production prescribed and instead will produce documents as they are kept in the ordinary course of business.
- b. Petitioner objects to the manner of production regarding ESI. Petitioner will instead propose a mutually agreeable ESI protocol.
- c. Petitioner objects to Respondent's demand that Petitioner provide "a statement that specifies the efforts that are necessary to retrieve the Requested ESI" as it exceeds the requirements of the Texas Rules of Civil Procedure.
- d. Petitioner objects to Respondent's demand that Petitioner provide "a statement that explains why and specifies the form in which the Requested data can be produced" as it exceeds the requirements of the Texas Rules of Civil Procedure.
- e. Petitioner objects to Respondent's demand that Petitioner produce "all responsive Documents" in his possession, custody, or control as defined in paragraph 6 of Respondent's Instructions as unduly burdensome, exceeding the scope of the Texas Rules of Civil Procedure, and as improperly seeking third-party discovery from Petitioner.
- f. Petitioner objects to Respondent's demand that Petitioner provide "in detail the unsuccessful efforts You made to locate each such Document" and to "identify who has the control and the location of the Documents," as these requests exceed the Texas Rules of Civil Procedure's requirements.
- g. Petitioner objects to Respondent's Instruction 8 as exceeding the scope of the Texas Rules of Civil Procedure.
- h. Petitioner objects to Respondent's Instruction 9 as exceeding the scope of the Texas Rules of Civil Procedure. Petitioner will produce relevant, non-privileged material in accordance with the Texas Rules of Civil Procedure.
- i. Petitioner objects to Respondent's Instruction 11 as exceeding the scope of the Texas Rules of Civil Procedure. Petitioner will comply with the Texas Rules of Civil Procedure regarding privilege.
- j. Petitioner objects to Respondent's Instruction 12 as exceeding the scope of the Texas Rules of Civil Procedure. Petitioner will comply with the Texas Rules of Civil Procedure regarding privilege.

13. For purposes of Petitioner's Objections and Responses, "Trust" means the Mary Kay – Richard R. Rogers 1975 Trust.

OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All Documents and Communications related to Tolleson, including but not limited to:

- a. All Communications between You and Tolleson, and all Documents related to those Communications;
- b. All Documents and Communications related to any payments, reimbursements, or other money sent to Tolleson, from the Trust or any other source associated with or owned by You or the Trust;
- c. All Documents and Communications related to any distributions from the Trust;
- d. All Documents and Communications related to requests for distributions made by You for Yourself or any of Your descendants;
- e. All Documents and Communications regarding Your financial condition, net worth, or other circumstances related to any requests for distributions for You or Your descendants;
- f. All Documents and Communications regarding any requests from Tolleson to You asking for supporting financial information, net worth information, or other evidence of financial necessity prior to making distributions to You or Your descendants; and
- g. All Documents and Communications related to Tolleson's recommendation(s) to You that Richard be provided with a catch-up distribution.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll [...] Communications related to Tolleson" as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between Petitioner, in his capacity as Trustee of the Trust, and Tolleson related to Trust distributions and reimbursements.
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between Petitioner, in his capacity as Trustee of the Trust, and Tolleson related to payments or reimbursements made to Tolleson as Trustee of the Trust.
- c. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between Petitioner, in his capacity as Trustee of the Trust, and Tolleson; Petitioner, in his capacity as beneficiary of the Trust, and Tolleson; or between the beneficiaries of the Trust and the Trustees, related to Trust distributions.
- d. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 1(c). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 1(c).

- e. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between Petitioner, in his capacity as beneficiary of the Trust, and Tolleson, regarding Petitioner's financial conditions provided for purposes of assessing distributions to Petitioner and his descendant, and such documents shall be marked as "Attorneys' Eyes Only."
- f. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 1(e). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 1(e).
- g. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 1(c). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 1(c).

REQUEST FOR PRODUCTION NO. 2:

All Documents and Communications related to the Trust, including but not limited to:

- a. All Documents and Communications related to distributions from the Trust;
- b. All Documents and Communications related to any distribution requested by or provided to any Trust beneficiary;
- c. All Documents and Communications related to Richard's alleged desire not to take distributions from the Trust;

- d. All Documents and Communications related to the December 28, 2009 Letter from Richard to Terri, Rick, and Ryan related to Trust distributions;
- e. All Documents and Communications related to any policies or guidelines the Trustees use, have used, or considered using to determine distributions to Trust beneficiaries;
- f. All Documents and Communications related to information demanded or received from Trust beneficiaries in order to evaluate distribution requests; and
- g. All Documents and Communications related to any conditions placed on, or requirements for, distributions from the Trust to any beneficiary.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll [...] Communications related to the Trust” as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 1(c). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 1(c).
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other

applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 1(c). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 1(c).

- c. Petitioner objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to Respondent's desire not to take distributions from the Trust.
- d. Petitioner objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to the December 28, 2009 Letter from Respondent to Terri, Rick, and Petitioner related to Trust distributions.
- e. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to policies and guidelines the Trustees use or have used to determine distributions to the Trust beneficiaries.
- f. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to information demanded or received from the Trust beneficiaries to evaluate distribution requests.

- g. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to any conditions placed on distributions from the Trust to any beneficiary.

REQUEST FOR PRODUCTION NO. 3:

All Documents and Communications related to Richard, including but not limited to:

- a. All Documents and Communications related to Richard's 2021 requests for monthly distributions;
- b. All Documents and Communications related to the Trustees' requests for information concerning Richard's assets, income, and expenses;
- c. All Documents and Communications related to the Trustees' distribution to Richard regarding a personal tax income liability;
- d. All Documents and Communications concerning the size of Richard's personal estate;
- e. All Documents and Communications related to Richard's capacity, mental health and physical wellbeing;
- f. All Documents and Communications related to allegations that Richard is being subjected to undue influence;
- g. All Documents and Communications related to Richard's attendance at meetings with the Trustee(s) and other beneficiaries, specifically related to making accommodations for Richard's attendance at meetings;
- h. All Documents and Communications related to Richard's 2022 estate planning changes; and
- i. All Documents and Communications related to the Trustees' decision to provide monthly distributions to Richard.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll [...] Communications related to Richard" as it does not even specify the sender or

receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to Respondent's 2021 requests for monthly distributions.
- b. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to the Trustees' request for information concerning Respondent's assets, income, and expenses.
- c. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to distributions to Respondent incurring a personal tax income liability.
- d. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between

the Trustees, related to any quantifiable figures mentioned with regards to the size of Respondent's personal estate for purposes of determining distributions to Respondent.

- e. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request to the extent it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner objects to this Request because it exceeds the permissible scope of discovery because it requests information concerning a testifying expert witness using a discovery tool not specified by Texas Rule of Civil Procedure 195.1. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, sufficient to show Respondent's lack of capacity, declining mental health and physical wellbeing.
- f. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request to the extent it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner objects to this Request because it exceeds the permissible scope of discovery because it requests information concerning a testifying expert witness using a discovery tool not specified by Texas Rule of Civil Procedure 195.1. Petitioner objects to this Request because it inappropriately asks for a legal conclusion. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, sufficient to show Nancy's influence over Respondent.
- g. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request to the extent it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to Respondent's attendance at meetings with the Trustees and other Trust beneficiaries and making special accommodations for Respondent's attendance at meetings.
- h. Petitioner objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to Respondent's 2022 estate planning changes.
- i. Petitioner objects to this Request because the Request seeks confidential

information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to the Trustees' decision to provide monthly distributions to Respondent.

REQUEST FOR PRODUCTION NO. 4:

All Documents and Communications related to Richard's catch-up payment request, including but not limited to:

- a. All Documents and Communications related to the Trustees' requests for information concerning Richard's assets, income, and expenses;
- b. All Documents and Communications concerning the size of Richard's personal estate;
- c. All Documents and Communications related to Richard's capacity, mental health and physical wellbeing;
- d. All Documents and Communications related to allegations that Richard is being subjected to undue influence;
- e. All Documents and Communications related to Your allegations that Richard is being manipulated by his wife, Nancy Rogers;
- f. All Documents and Communications related to Your allegations that Richard is being manipulated by any other third parties, including financial advisors and lawyers;
- g. All Documents and Communications related to Richard's 2022 estate planning changes; and
- h. All Documents and Communications related to the Trustees' decision not to provide Richard with a catch-up distribution/catch-up payment.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll [...] Communications related to Richard's catch-up payment request" as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and

Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 3(b). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 3(b).
- b. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 3(d). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 3(d).
- c. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request to the extent it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner objects to this Request because it exceeds the permissible scope of discovery because it requests information concerning a testifying expert witness using a discovery tool not specified by Texas Rule of Civil Procedure 195.1. Petitioner further objects to this Request as it is duplicative of Request No. 3(e). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 3(e).
- d. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request to the extent it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner objects to this Request because it exceeds the permissible scope of discovery because it requests information concerning a testifying expert witness using a discovery tool not specified by Texas Rule of Civil Procedure 195.1. Petitioner objects to this Request because it inappropriately asks for a legal conclusion. Petitioner further objects to this Request as it is duplicative of Request No. 3(f). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 3(f).

- e. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request to the extent it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 3(f) and 4(d). Petitioner objects to this Request because it exceeds the permissible scope of discovery because it requests information concerning a testifying expert witness using a discovery tool not specified by Texas Rule of Civil Procedure 195.1. Petitioner objects to this Request because it inappropriately asks for a legal conclusion. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request Nos. 3(f) and 4(d).
- f. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request to the extent it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, sufficient to show third parties' influence over Respondent.
- g. Petitioner objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 3(h). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 3(h).
- h. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the beneficiaries of the Trust and the Trustees, or between the Trustees, related to the Trustees' decision not to provide Respondent with a catch-up distribution.

REQUEST FOR PRODUCTION NO. 5:

All Documents and Communications related to distributions from the Mary Kay Family Trusts, including but not limited to:

- a. All Documents and Communications related to any distributions from the Mary Kay Family Trusts to any beneficiary;

- b. All Documents and Communications related to the Mary Kay Family Trusts' alleged distribution caps; and
- c. All Documents and Communications related to the Mary Kay Family Trusts allegedly being depleted.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between Petitioner, in his capacity as Trustee of the Trust, and Tolleson related to Trust distributions.

- a. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between Petitioner, in his capacity as Trustee of the Trust, and Tolleson related to Trust distributions.
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to the Trust's distribution caps.
- c. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications

protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to the Trust being depleted.

REQUEST FOR PRODUCTION NO. 6:

All Documents and Communications sent by the Trustees to any beneficiary of a Trust that was sent as required by the terms of the Trust or in connection with the Trustees' duty of disclosure.

RESPONSE:

Petitioner objects to this Request because it is overly broad. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications from the Trustees to any Trust beneficiary related to the Trust as required by the Trust, if any obligations exist.

REQUEST FOR PRODUCTION NO. 7:

All Document and Communications related to any accounting information demands sent to or received by any beneficiaries of the Mary Kay Family Trusts, including but not limited to a copy of the demand and any documents, records, statements, or formal accountings produced in response to such demands.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications from the Trustees to Trust beneficiaries related to accounting information demands sent to or received by a Trust beneficiary.

REQUEST FOR PRODUCTION NO. 8:

All Documents and Communications related to Tolleson's compliance with Section 2.A.5. of the Trust, specifically the requirement to keep detailed statements of expenditures, receipts, and proceedings for the past year and disclose such information to the beneficiaries upon requests.

RESPONSE:

Petitioner objects to this Request because it is overly broad. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, sufficient to show Tolleson's compliance with Section 2.A.5 of the Trust.

REQUEST FOR PRODUCTION NO. 9:

All Documents and Communications related to any meetings between the Trustees and beneficiaries, including but not limited to:

- a. All Documents and Communications related to any draft or final analyses or presentations, including any underlying models for the presentations;
- b. All Documents and Communications related to any actual or requested virtual meeting attendance;
- c. All Documents and Communications related to any policies and procedures regarding who can attend meetings with beneficiaries;
- d. All Documents and Communications related to the December 2023 beneficiary meeting alleged in Paragraph 49 of Your First Amended Petition;
- e. All Documents and Communications related to the June 2025 beneficiary meeting; and
- f. All Documents and Communications related to Richard's request for information related to the June 2025 beneficiary meeting.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll [...] Communications related to any meetings" as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees,

regarding official family meetings related to the Trust.

- a. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce final versions of analyses or presentations used for official family meetings between the Trustees and the Trust beneficiaries.
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to virtual meeting attendance.
- c. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to policies and procedures regarding who can attend meetings with beneficiaries.
- d. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to the December 2023 beneficiary meeting.
- e. Petitioner objects to this Request because it seeks documents and communications that post-date the commencement of this litigation. Such documents are not discoverable because they were created in anticipation of or in connection with this litigation and are therefore protected by the attorney-client privilege, work product doctrine, or other applicable privilege or immunity. Petitioner will not produce any documents or communications in response to this Request.
- f. Petitioner objects to this Request because it seeks documents and communications that post-date the commencement of this litigation. Such documents are not discoverable because they were created in anticipation of or in connection with this litigation and are therefore protected by the attorney-client privilege, work product doctrine, or other applicable privilege or immunity. Petitioner will not produce any documents or communications in response to this Request.

REQUEST FOR PRODUCTION NO. 10:

All Documents and Communications related to any requests for accommodations, including conference calls, video conferencing, proxy attendance, or other accommodations, made by beneficiaries to attend any meeting between the Trustees and beneficiaries of the Mary Kay Family Trusts.

RESPONSE:

Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request as it is duplicative of Request No. 9(b). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 9(b).

REQUEST FOR PRODUCTION NO. 11:

All Documents and Communications related to Tolleson's stated "policy" that beneficiaries in litigation with the Trustees are prohibited from attending meetings between beneficiaries and the Trustees.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, regarding any policy that beneficiaries in litigation with the Trustees are prohibited from attending meetings between beneficiaries and the Trustees.

REQUEST FOR PRODUCTION NO. 12:

All Documents and Communications related to Your voting of stock owned by the Mary Kay Family Trusts and Your appointment as CEO of Mary Kay.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to this Request to the extent it seeks documents that are in a third-party's possession, custody, or control. Based on these objections, Petitioner will not produce any documents in response to this Request.

REQUEST FOR PRODUCTION NO. 13:

All Documents and Communications related to Mary Kay's financial health and MKHC's financial health, including but not limited to:

- a. All Documents and Communications related to Mary Kay's and MKHC's balance sheet, income statement, cash flow statement, and forecast(s);
- b. All Documents and Communications related to Mary Kay dividend payments and MKHC dividend payments;
- c. All Documents and Communications related to valuing Mary Kay's stock and MKHC's stock;
- d. All Documents and Communications related to all dividends, bonuses, distributions, or any other compensation paid to You by Mary Kay or MKHC; and
- e. All Documents and Communications related to any audits of Mary Kay or MKHC.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust, and to the extent it seeks documents in Respondent's possession, custody, or control or to which Respondent has an equal right of possession, custody, or control.

- a. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust, and to the extent it seeks information in Respondent's possession, custody, or control. Petitioner will not produce any documents in response to this Request.
- b. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust, and to the extent it seeks information in Respondent's possession, custody, or control. Petitioner will not produce any documents in response to this Request.
- c. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee

of the Trust, and to the extent it seeks information in Respondent's possession, custody, or control. Petitioner will not produce any documents in response to this Request.

- d. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust, and to the extent it seeks information in Respondent's possession, custody, or control. Petitioner will not produce any documents in response to this Request.
- e. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust, and to the extent it seeks information in Respondent's possession, custody, or control. Petitioner will not produce any documents in response to this Request.

REQUEST FOR PRODUCTION NO. 14:

All Documents and Communications related to Golden Rule, including but not limited to:

- a. All Documents and Communications related to the formation and operation of Golden Rule;
- b. All Documents and Communications related to MKHC's approval of Golden Rule and the back-dating of Board approval for the formation of Golden Rule;
- c. All Documents and Communications related to any capital contributions made by MKHC to Golden Rule;
- d. All Documents and Communications related to the Trust's investment in Golden Rule, including information related to capital accounts and distributions made from Golden Rule to the Trust, if any;
- e. All Documents and Communications related to payments from Golden Rule to You or Tolleson;
- f. All Documents and Communications related to any payments or capital transfers from GRI to GRM or vice versa;
- g. All Documents and Communications related to any policies or procedures related to Golden Rule;
- h. All Documents and Communications related to any tax or accounting advice You or Tolleson requested or received related to Golden Rule;

- i. All Documents and Communications related to any Golden Rule investments;
- j. All Documents and Communications related to any reimbursements owed to Golden Rule;
- k. All Documents and Communications related to expenses incurred by Golden Rule; and
- l. All Documents and Communications related to any audits of Golden Rule.

RESPONSE:

Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to GRI and GRM. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll [...] Communications related to Golden Rule” as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner’s possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to the formation and operation of GRI and GRM.
- b. Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to the formation of GRI and GRM. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner

objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to MKHC's approval of GRI and GRM.

- c. Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to the formation of GRI and GRM. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to capital contributions made by the Trust in GRI.
- d. Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to GRI and GRM. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to the Trust's investments through GRI.
- e. Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to GRI and GRM. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner does not receive any payments from GRI or GRM, so there are no responsive documents to this Request.
- f. Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to GRI and GRM.

Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to capital transfers from GRI to GRM.

- g. Petitioner objects to this Request because it is overly broad. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "policies or procedures related to Golden Rule", and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to policies or procedures related to GRI or GRM, if any.
- h. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to tax or accounting advice the Trustees requested or received related to GRI or GRM, if any.
- i. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these

objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to GRI investments.

- j. Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to GRI and GRM. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, there are no "reimbursements owed to Golden Rule," so there are no responsive documents to this Request.
- k. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to expenses incurred by GRI.
- l. Petitioner objects to this Request because it is overly broad. Petitioner objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trust beneficiaries and the Trustees, or between the Trustees, related to external audits of GRI.

REQUEST FOR PRODUCTION NO. 15:

All Documents and Communications, including copies of the policies, related to any insurance policies held by You, MKHC, Mary Kay, or Golden Rule, which could be responsible for any claims asserted in this Action.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, and responsive documents sufficient to show the amount of insurance coverage, if any, that Petitioner has that is applicable to this Action.

REQUEST FOR PRODUCTION NO. 16:

All Documents and Communications sent to or received from third parties pursuant to any subpoenas You serve in this matter.

RESPONSE:

Petitioner will produce documents and communications responsive to this Request.

REQUEST FOR PRODUCTION NO. 17:

All Documents and Communications related to Your personal finances, including but not limited to:

- a. Complete personal federal and state tax returns with all schedules and attachments;
- b. All financial statements, net worth statements, or balance sheets reflecting Your personal financial condition;
- c. All Documents and Communications related to Your personal assets, including real estate, securities, financial accounts, art, collectibles, vehicles, and other investments;
- d. All Documents and Communications related to Your personal liabilities, including mortgages, loans, credit card debt, and other obligations;
- e. All Documents and Communications related to Your personal monthly income and expenses; and
- f. All Documents and Communications related to financial gifts, transfers, or other benefits You have provided to or received from any family member or related entity.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll [...] Communications related to Your personal finances" as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity

the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not be producing any documents in response to this Request.

- a. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not be producing any documents in response to this Request.
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not be producing any documents in response to this Request.
- c. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not be producing any documents in response to this Request.
- d. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not be producing any documents in response to this Request.
- e. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably

calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not be producing any documents in response to this Request.

- f. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not be producing any documents in response to this Request.

REQUEST FOR PRODUCTION NO. 18:

All Documents and Communications between You and any business, financial, or tax advisor regarding the Trust, Mary Kay, MKHC, or Golden Rule, including but not limited to:

- a. All engagement letters with any attorney, accountant, financial advisor, or consultant;
- b. All Documents and Communications related to any tax or financial planning advice regarding the Trust, distributions, or Trust assets; and
- c. All billing records, invoices, or payment receipts for any professional services related to the Trust, Mary Kay, MKHC, or Golden Rule.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to

this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce engagement letters between any attorney, accountant, financial advisor, or consultant and Petitioner in his capacity as Trustee of the Trust, if any.

- b. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between Petitioner as Trustee of the Trust and any tax or financial advisors related to tax or financial planning advice regarding the Trust, Trust distributions, or Trust assets, if any.

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Based on these objections, Petitioner will produce billing records sufficient to show Petitioner's professional services conducted for the Trust or GRI, if any.

REQUEST FOR PRODUCTION NO. 19:

All Documents and Communications related to any conflicts of interest between Your role as Trustee of the Trust and Your roles at Mary Kay, MKHC, or Golden Rule, including but not limited to:

- a. All Documents and Communications related to any conflict of interest policies or procedures;
- b. All Documents and Communications related to any disclosures of conflicts made to Mary Kay board, MKHC officers, or Trust beneficiaries;
- c. All Documents and Communications related to any recusals from decisions due to conflicts; and
- d. All Documents and Communications related to any legal or ethical advice sought regarding potential conflicts.

RESPONSE:

Petitioner objects to this Request because Respondent assumes facts that are not true or otherwise mischaracterizes or misstates any facts related to Petitioner's roles. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll [...] Communications related to any conflicts of interests [...]" as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce any conflict-of-interest policies or procedures related to the Trust or GRI, if any.
- b. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce any disclosures of conflicts made by Petitioner in his capacity as Trustee of the Trust, if any.
- c. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner objects to this Request because it is vague and ambiguous with respect to the terms "any recusals from decisions due to conflicts" as it is unclear who's recusal it is referring to. Based on these objections, Petitioner will produce any formal recusals made by Petitioner in his capacity as Trustee of the Trust, or by Respondent, if any.
- d. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or

protection. Based on these objections, Petitioner will only produce relevant, non-privileged, responsive documents and communications related to legal or ethical advice regarding potential conflicts.

REQUEST FOR PRODUCTION NO. 20:

All calendars, appointment books, diaries, or other scheduling records maintained by You or on Your behalf, including but not limited to:

- a. All Documents and Communications related to meetings with any Trust beneficiaries;
- b. All Documents and Communications related to meetings with Tolleson;
- c. All Documents and Communications related to meetings with other Trust beneficiaries; and
- d. All Documents and Communications related to meetings with Mary Kay, MKHC, or Golden Rule executives or board members.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is unduly burdensome. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll [...] Communications related to meetings with any Trust beneficiaries” as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 9. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 9.
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably

calculated to lead to the discovery of admissible evidence. Petitioner objects to this Request because it is vague and ambiguous with respect to the term “meetings.” Based on these objections, Petitioner will produce Petitioner’s calendar appointments for meetings with Tolleson and any scheduling records of Trust-related meetings.

- c. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is unduly burdensome. Petitioner further objects to this Request as it is duplicative of Request No. 20(a). Petitioner objects to this Request because it is vague and ambiguous with respect to the term “other Trust beneficiaries.” To the extent “other Trust beneficiaries” refer to beneficiaries of other Mary Kay Trusts that are not the Trust, Petitioner responds as follows: such documents are not relevant nor reasonably calculated to lead to the discovery of admissible evidence and thus Petitioner will not produce such documents. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 20(a).
- d. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner’s possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce any meeting records, held in his capacity as Trustee of the Trust, with Mary Kay, MKHC, GRI, or GRM executives or board members if they relate to distributions made from the Trust or about the management of the Trust, if any.

REQUEST FOR PRODUCTION NO. 21:

All Documents and Communications related to Your compensation from any source for the past five years, including but not limited to:

- a. All employment contracts, consulting agreements, or independent contractor agreements;
- b. All Documents and Communications related to salary, bonuses, stock options, or other forms of compensation from Mary Kay, MKHC, or Golden Rule;
- c. All Documents and Communications related to any compensation received for Your services as Trustee; and
- d. All Documents and Communications related to any fringe benefits, perquisites, or expense reimbursements from any source.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence and is not proportional to the needs of this case. Petitioner further objects

because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner does not receive any compensation as Trustee of the Trust, so there are no responsive documents to this Request.

- a. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence and is not proportional to the needs of this case. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner does not receive any compensation as Trustee of the Trust, so there are no responsive documents to this Request.
- b. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence and is not proportional to the needs of this case. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner does not receive any compensation as Trustee of the Trust, so there are no responsive documents to this Request.
- c. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence and is not proportional to the needs of this case. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner does not receive any compensation as Trustee of the Trust, so there are no responsive documents to this Request.
- d. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence and is not proportional to the needs of this case. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner does not receive any compensation as Trustee of the Trust, so there are

no responsive documents to this Request.

REQUEST FOR PRODUCTION NO. 22:

All Documents and Communications related to any loans, advances, or other financial transactions between You and the Trust, Mary Kay, MKHC, or Golden Rule, including but not limited to:

- a. All loan agreements, promissory notes, or other debt instruments;
- b. All Documents and Communications related to repayment terms, interest rates, or collateral;
- c. All Documents and Communications related to any forgiven loans or debt; and
- d. All Documents and Communications related to any guarantees provided by You or for Your benefit.

RESPONSE:

There are no loans, advances, or other financial transactions of this nature between Petitioner and the entities listed, so there are no responsive documents to this Request.

- a. There are no loans, advances, or other financial transactions of this nature between Petitioner and the entities listed, so there are no responsive documents to this Request.
- b. There are no loans, advances, or other financial transactions of this nature between Petitioner and the entities listed, so there are no responsive documents to this Request.
- c. There are no loans, advances, or other financial transactions of this nature between Petitioner and the entities listed, so there are no responsive documents to this Request.
- d. There are no loans, advances, or other financial transactions of this nature between Petitioner and the entities listed, so there are no responsive documents to this Request.

REQUEST FOR PRODUCTION NO. 23:

All Documents and Communications related to Your personal use of any assets owned by the Trust, Mary Kay, MKHC, or Golden Rule, including but not limited to:

- a. All Documents and Communications related to use of real property, vehicles, aircraft, or watercraft;
- b. All Documents and Communications related to reimbursements or payments for personal expenses;
- c. All Documents and Communications related to any corporate credit card statements

and receipts; and

- d. All Documents and Communications related to any accounting or tax treatment of such personal use.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence and is not proportional to the needs of this case. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Neither the Trust nor GRI owns any assets nor do they pay any personal expenses, so there are no responsive documents to this Request.

- a. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Neither the Trust nor GRI owns any assets nor do they pay any personal expenses, so there are no responsive documents to this Request.
- b. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Neither the Trust nor GRI owns any assets nor do they pay any personal expenses, so there are no responsive documents to this Request.
- c. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Neither the Trust nor GRI owns any assets nor do they pay any personal expenses, so there are no responsive documents to this Request.
- d. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because

the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Neither the Trust nor GRI owns any assets nor do they pay any personal expenses, so there are no responsive documents to this Request.

REQUEST FOR PRODUCTION NO. 24:

All Documents and Communications with any Trust beneficiary other than Richard regarding the Trust, including but not limited to:

- a. All Documents and Communications related to distributions to other beneficiaries;
- b. All Documents and Communications related to other beneficiaries' opinions or positions regarding Richard's distribution requests or distributions to Richard; and
- c. All Documents and Communications related to any family meetings or discussions regarding the Trust or Richard.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll [...] Communications with any Trust beneficiary other than Richard regarding the Trust" as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 2.

- a. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 2.

- b. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 2.
- c. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 2.

REQUEST FOR PRODUCTION NO. 25:

All Documents and Communications related to any proposed or actual changes to the Trust terms or administration since You became Trustee, including but not limited to:

- a. All Documents and Communications related to any proposed amendments, modifications, or restatements;
- b. All Documents and Communications related to any changes in investment policies or strategies;
- c. All Documents and Communications related to any changes in distribution policies or procedures; and

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

- a. There are no amendments, modifications, or restatements of the Trust during the relevant time period (as Respondent defined the relevant time period for Respondent's Requests), so there are no responsive documents to this Request.
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications related to changes in investment policies or strategies for the Trust.
- c. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications related to changes in distribution policies or procedures for the Trust.

REQUEST FOR PRODUCTION NO. 26:

All Documents and Communications related to any Trust investments, including but not limited to:

- a. All investment policies, guidelines, or strategies;
- b. All Documents and Communications related to investment performance, including any reports, analyses, or statements;
- c. All Documents and Communications related to investment decisions, including purchases, sales, or holds;
- d. All Documents and Communications related to any investment fees, expenses, or commissions; and
- e. All Documents and Communications related to any investments in entities in which You have a personal interest.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, is not proportional to the needs of this case, and is unduly burdensome.

Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll [...] communications related to any Trust investments” as it does not even specify the sender or receiver of such communication, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner’s possession, custody, or control, as Trustee of the Trust. Petitioner further objects to this Request as it is duplicative of Request No. 14. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce investment policies, guidelines, or strategies used by the Trust.
- b. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce investment performance reports or analyses for the Trust.
- c. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce investment decisions for the Trust.
- d. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order.

Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce documents sufficient to show investment fees, expenses, or commissions related to the Trust.

- e. Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner objects to this Request because it is vague and ambiguous with respect to the terms "You have a personal interest." Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce documents sufficient to show investments made by the Trust.

REQUEST FOR PRODUCTION NO. 27:

All Documents and Communications You intend to use, introduce, or rely on at trial in this Action.

RESPONSE:

Petitioner objects to this Request because that it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications in accordance any Court ordered scheduling order.

REQUEST FOR PRODUCTION NO. 28:

All Documents and Communications related to whether adopted persons (including but not limited to person adopted as adults) are or can be beneficiaries of any trust, including but not limited to the Trust.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications between the Trustees regarding adopted persons.

REQUEST FOR PRODUCTION NO. 29:

All Documents and Communications related to Olivia Abbott.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeking information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner objects to this Request because it is unduly burdensome given it requests “[a]ll Documents and Communications” related to an individual for a nearly six-year period. Additionally, Petitioner objects to this Request because it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not produce any documents or communications in response to this Request, but Petitioner is willing to confer with Respondent regarding this Request’s scope.

REQUEST FOR PRODUCTION NO. 30:

All Documents and Communications related to Nancy Rogers.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeking information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner objects to this Request because it is unduly burdensome given it requests “[a]ll Documents and Communications” related to an individual for a nearly six-year period. Additionally, Petitioner objects to this Request because it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not produce any documents or communications in response to this Request, but Petitioner is willing to confer with Respondent regarding this Request’s scope.

REQUEST FOR PRODUCTION NO. 31:

All Documents and Communications related to Warren Lichtenstein.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeking information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner objects to this Request because it is unduly burdensome given it requests “[a]ll Documents and Communications” related to an individual for a nearly six-year period. Additionally, Petitioner objects to this Request because it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not produce any documents or communications in response to this Request, but Petitioner is willing to confer with Respondent regarding this Request’s scope.

REQUEST FOR PRODUCTION NO. 32:

All Documents and Communications related to Keith Bloomfield.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeking information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner objects to this Request because it is unduly burdensome given it requests “[a]ll Documents and Communications” related to an individual for a nearly six-year period. Additionally, Petitioner objects to this Request because it seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not produce any documents or communications in response to this Request, but Petitioner is willing to confer with Respondent regarding this Request’s scope.

REQUEST FOR PRODUCTION NO. 33:

All Documents and Communications related to Richard’s removal of Tolleson as Corporate Trustee in November 2024, including but not limited to any correspondence between You and Tolleson related to the effectiveness of such removal.

RESPONSE:

Petitioner objects to this Request because it is overly broad. Additionally, this Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications.

REQUEST FOR PRODUCTION NO. 34:

All Documents and Communications with or related to Rick, and any of his descendants, including but not limited to Documents and Communications about the following topics:

- a. Requests for distributions from the Trust;
- b. Distributions made from the Trust;
- c. Information requested from Rick, or any of his descendants, by the Trustee(s) related to personal financial status, net worth, or financial need;
- d. Any information provided by Rick, or any of his descendants, to the Trustee(s) related to personal financial status, net worth, or financial need;
- e. Trustee(s) rejection of request for distribution from the Trust made by Rick or his descendants;
- f. Richard’s request for a catch-up distribution;
- g. Richard’s monthly distributions;
- h. Payment for Richard’s medical expenses;
- i. Nancy Rogers;

- j. Richard's requests for reimbursement of medical and caregiving expenses;
- k. Financial status of the Trust and its investments;
- l. Compensation paid to Ryan;
- m. Compensation paid to Tolleson;
- n. Distributions made to Richard;
- o. Distributions made to Ryan and his descendants;
- p. Distributions made to Terri and her descendants;
- q. Richard's adoption of Olivia Abbott; and
- r. Settlement of Richard's claims against Ryan and Tolleson.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll Documents and Communications with or related to Rick, and any of his descendants" as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner also objects to this Request as it is duplicative of Request Nos. 1, 2, 3, 4, 21, 24, 30, 38, and 39. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

- a. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll Documents and Communications with or related to Rick, and any of his descendants" as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request

Nos. 1(c) and 2(b). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 9(b).

- b. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c) and 2(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c) and 2(a).
- c. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2(f). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 2(f).
- d. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2(f). Based on these objections, Petitioner will produce relevant, non-

privileged, responsive documents pursuant to Request No. 2(f).

- e. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c), 2(a), and 2(b). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c), 2(a), and 2(b).
- f. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 4. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 4.
- g. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request

No. 3(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 3(a).

- h. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 24. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 24.
- i. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 30. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 30.
- j. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request

No. 3. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 3.

- k. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 24 and 39. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 24 and 39.
- l. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 21. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 21.
- m. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request

No. 1. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 1.

- n. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 2(a) and 3(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 2(a) and 3(a).
- o. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c) and 2(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c) and 2(a).
- p. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client

privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c) and 2(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c) and 2(a).

- q. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 29. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 29.
- r. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Rick, and any of his descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not produce any documents or communications in response to this Request.

REQUEST FOR PRODUCTION NO. 35:

All Documents and Communications with or related to Terri, and any of her descendants, including but not limited to Documents and Communications about the following topics:

- a. Requests for distributions from the Trust;
- b. Distributions made from the Trust;
- c. Information requested from Terri, or any of her descendants, by the Trustee(s) related to personal financial status, net worth, or financial need;

- d. Any information provided by Terri, or any of her descendants, to the Trustee(s) related to his personal financial status, net worth, or financial need;
- e. Trustee(s) rejection of request for distribution from the Trust made by Terri, or any of her descendants;
- f. Richard's request for a catch-up distribution;
- g. Richard's monthly distributions;
- h. Payment for Richard's medical expenses;
- i. Nancy Rogers;
- j. Richard's requests for reimbursement of medical and caregiving expenses;
- k. Financial status of the Trust and its investments;
- l. Compensation paid to Ryan;
- m. Compensation paid to Tolleson;
- n. Distributions made to Richard;
- o. Distributions made to Rick and his descendants;
- p. Distributions made to Terri and her descendants;
- q. Richard's adoption of Olivia Abbott; and
- r. Settlement of Richard's claims against Ryan and Tolleson.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll Documents and Communications with or related to Terri, and any of her descendants" as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner also objects to this Request as it is duplicative of Request Nos. 1, 2, 3, 4, 21, 24, 30, 38, and 39. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents according to the subparagraphs below.

is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c) and 2(b). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents and communications pursuant to Request No. 9(b).

- b. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c) and 2(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c) and 2(a).
- c. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2(f). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 2(f).

- d. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 2(f). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 2(f).
- e. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c), 2(a), and 2(b). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c), 2(a), and 2(b).
- f. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 4. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 4.

- g. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 3(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 3(a).
- h. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 24. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 24.
- i. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 30. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 30.

- j. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 3. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 3.
- k. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 24 and 39. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 24 and 39.
- l. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 21. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 21.

- m. Petitioner objects to this Request because it is overly broad and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request 1. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 1.
- n. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 2(a) and 3(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 2(a) and 3(a).
- o. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c) and 2(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c) and 2(a).

- p. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request Nos. 1(c) and 2(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request Nos. 1(c) and 2(a).
- q. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to this Request as it is duplicative of Request No. 29. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 29.
- r. Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms “[a]ll Documents and Communications with or related to Terri, and any of her descendants” as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will not produce any documents

or communications in response to this Request.

REQUEST FOR PRODUCTION NO. 36:

All Documents or Communications related to, referencing, or concerning Richard's requests for medical reimbursement made on June 20, 2025.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to this Request.

REQUEST FOR PRODUCTION NO. 37:

All Documents or Communications sent to or received from any Trust beneficiary related to the claims asserted in this Action.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to the Request to the extent that seeking documents and communications "related to the claims asserted in this Action" inappropriately asks for a legal conclusion as to the nature and scope of relevant legal issues. Petitioner further objects that this Request is duplicative of Request No. 4. Based on these objections, Petitioner will not produce any documents or communications in response to this Request.

REQUEST FOR PRODUCTION NO 38:

All Documents or Communications sent to or received from any Trust beneficiary or third party related to the Settlement of the claims asserted in this Action.

RESPONSE:

Petitioner objects to this Request because it is overly broad, seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, and is not proportional to the needs of this case. Petitioner further objects to this Request because it is vague and ambiguous with respect to the terms "[a]ll Documents and Communications sent to or received from any Trust beneficiary or third party" as it does not even specify the sender or receiver of such information, and does not specify with sufficient particularity the documents sought to be produced and constitutes an impermissible fishing

expedition. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Petitioner further objects to the Request to the extent that seeking documents and communications “related to the Settlement of the claims asserted in this Action” inappropriately asks for a legal conclusion as to the nature and scope of relevant legal issues. Petitioner further objects that this Request is duplicative of Request Nos. 34(r) and 35(r). Based on these objections, Petitioner will not produce any documents or communications in response to this Request.

REQUEST FOR PRODUCTION NO. 39:

All Documents or Communications related to the Trust’s financial records, including but not limited to general ledgers, balance sheets, Profit and Loss Statements, asset lists, tax returns, K-1s, 1099s, bank statements, investment statements, and other financial records.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, any responsive confidential matter shall be produced only subject to a protective order. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents reflecting the Trust’s financial records.

REQUEST FOR PRODUCTION NO 40:

All Documents or Communications related to Golden Rule’s financial records, including but not limited to general ledgers, balance sheets, Profit and Loss Statements, asset lists, tax returns, K-1s, 1099s, bank statements, investment statements, and other financial records.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, any responsive confidential matter shall be produced only subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner’s possession, custody, or control, as Trustee of the Trust. Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents, if any, for GRI.

REQUEST FOR PRODUCTION NO 41:

All Documents or Communications related to the formation of GRM and GRI, including all formation documents, membership agreements, partnership agreements, board resolutions, public information reports, Secretary of State filings, initial meeting minutes or unanimous consents.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Petitioner further objects to this Request as it is duplicative of Request No. 14(a). Based on these objections, Petitioner will produce relevant, non-privileged, responsive documents pursuant to Request No. 14(a).

REQUEST FOR PRODUCTION NO. 42:

All Documents or Communications related to administrative records of GRM and GRI, including but not limited to annual meeting minutes, resolutions, unanimous consents, reports of officers, directors, managers, or partners.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Based on these objections, there are no administrative records kept for GRI, so there are no responsive documents to this Request.

REQUEST FOR PRODUCTION NO. 43:

All Documents or Communications related to payment or reimbursement from the Trust of any legal fees or expenses, directly or indirectly, including but not limited to payment or reimbursement to any counsel for Ryan or Tolleson.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged, and responsive documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 44:

All Documents or Communications related to the creation, amendment, restatement, judicial modification, or any other changes made to the Trust, including but not limited to the judicial modification that occurred in 2012.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects that this Request is duplicative of Request No. 25. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Additionally, the Request seeks information, documents, and communications protected by the attorney-client privilege, work product doctrine, or other applicable privilege, immunity, or protection. Based on these objections, Petitioner will produce relevant, non-privileged documents reflecting the final drafts of any amendment or modification of the Trust.

REQUEST FOR PRODUCTION NO. 45:

All Documents or Communications, related to any policies of life insurance held by the Trust, or one of its subsidiaries, with Richard as the measuring life.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Petitioner further objects that this Request is duplicative of Request No. 15. Based on these objections, Petitioner will produce life insurance policies held by the Trust with Respondent as the measuring life, should any exist.

REQUEST FOR PRODUCTION NO. 46:

All Documents or Communications related to any payment, compensation, or other benefits received by any Director on the Board of Mary Kay or MKHC.

RESPONSE:

Petitioner objects to this Request because it is overly broad and seeks information that is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Petitioner objects to this Request to the extent it seeks information about documents outside of Petitioner's possession, custody, or control, as Trustee of the Trust. Petitioner further objects because the Request seeks confidential information, and Petitioner will only produce any responsive confidential information subject to a protective order. Based on these objections, Petitioner will not produce documents responsive to this Request.

Dated: September 22, 2025

Respectfully submitted,

By: /s/ John T. Cox III

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ATTORNEYS FOR PETITIONERS

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of September, 2025, a true and correct copy of the foregoing document was served on all counsel of record in accordance with the Texas Rules of Civil Procedure.

By: /s/ John T. Cox III
John T. Cox III

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Envelope ID: 107924988
Filing Code Description: Motion - Compel
Filing Description: ENVELOPE #107924988 DOC001
Status as of 11/11/2025 7:20 PM CST

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Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Sandra Chaimowicz on behalf of Chad McLain
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schaimowicz@dallasestatelaw.com
Envelope ID: 107924988
Filing Code Description: Motion - Compel
Filing Description: ENVELOPE #107924988 DOC001
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