SAVRICK, SCHUMANN, JOHNSON & MCGARR

PARTNERS:

MITCHELL D. SAVRICK GARY N. SCHUMANN CAMILLE JOHNSON CRISTINA B. MCGARR ROBERT L. KAMINSKI C. WILSON SHIRLEY CARI EZELL

OF COUNSEL: MARK D. HOPKINS

Writer's email: bob@ssjmlaw.com

Attorneys At Law

HERITAGE SQUARE - G
2901 BEE CAVES ROAD
AUSTIN, TEXAS 78746
TELEPHONE (512) 347-1604
FAX (512) 347-1676

DALLAS OFFICE: TWIN SIXTIES TOWER 6060 N. CENTRAL EXPRESSWAY SUITE 560 DALLAS, TEXAS 75206 TELEPHONE (214) 800-2898 FAX (214) 292-9647

Via Facsimile

November 18, 2003

Isaac Castro Castro & Davis P.O. Box 608 Hamlin, Texas 79520

Da.

Cause No. 4222-A; <u>In the Estate of Ida Baldwin, Denison, Deceased</u>; In the 39th Judicial District Court of Stonewall County, Texas

Dear Mr. Castro:

Thank you for your letter dated November 17, 2003 in which you state your refusal to produce Mr. and Mrs. Denison for their depositions. I respectfully disagree with your assessment of the legal effect of the fraudulently induced "settlement agreement" on my client's right to conduct discovery in this case. To that end, we served a deposition notice yesterday for John Denison, and will serve a second notice for Mrs. Denison today. Please inform us of your intentions regarding these depositions at your earliest possible opportunity.

We recently became aware of several deeds prepared by you and filed by your client purporting to shift the ownership and the tax liability for the subject properties to the Bob Denison Trust. Please provide me with a copy of the court order authorizing that transfer of estate property. My client hereby demands that John Denison pay all outstanding taxes on all properties of the estate, including those made the subject of these recently filed deeds which you prepared. Curiously, neither my client, his attorneys, the ad litem, nor any other party or attorney connected with this case, received any notice from you that these documents were filed. Also interesting is the fact that several terms set forth in these absurd deeds are nowhere to be found in the settlement agreement the deeds are purportedly based upon.

I look forward to hearing from you regarding the depositions.

Very truly yours,

Robert L. Kaminski

RLK

cc: Mark Zachary

McMahon, Surovik, Suttle, Buhrmann, Hicks & Gill

P.O. Box 3679

Abilene, Texas 79604

Kenneth G. Leggett

Gravley, Wheeler, McCray & Leggett, PLLC

P.O. Box 3579

Abilene, Texas 79604-3579

L. Vance Stanton

Attorney at Law

10723 Preston Road, Box 105

Dallas, Texas 75270-2199

Via Facsimile

Via Facsimile

Via Facsimile

November 18, 2003 Page 3

bcc:

Bob Denison 320 N. Main #100 Buda, Texas 78610

Charles C. Self, III Whitten & Young, P.C. Post Office Box 208 Abilene, Texas 79604

Glenn M. Karisch Barnes & Karisch, P.C. 2901-D Bee Caves Rd. Austin, Texas 78746