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October 23, 1998

VIA FACSIMILE: 915-576-2799

Mr. Isaac Castro
Castro & Davis
Attorneys at Law
P.O. Box 608
Hamlin, Texas 79520

Re: Ida Denison Estate

Dear Mr. Castro:

I have discussed the meeting for Monday, October 26, 1998, with my client, Bob Denison, and we would like available at the meeting for our review the following:

1. An accounting by the duly named Independent Executor, John Wayne Denison, of the estate during his tenure as Independent Executor.
2. Records showing the present condition of the oil and gas mineral rights, including but not limited to monthly runs, present leases, and named lessees.
3. Status of the real property, including present tenants, amount of annual leases, including both surface leases and hunting leases.
4. Records of distributions and income to the estate, and any disbursements to John Wayne Denison, Devisee, or John Wayne Denison, Independent Executor.

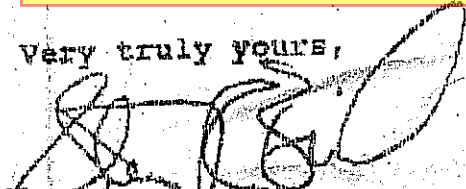
These items would be necessary for me to review with my client prior to our discussions regarding the land use valuations and any signatures of my client on any tax documentation for land use valuation and other estate documents.

It is also my understanding that this conference is for the purpose of resolving the differences which are alleged in the present law suit, with the intent that documents be signed whereby Bob Wayne Denison will own one-half of the estate jointly with his brother John Wayne Denison.

If any of the above is not agreeable and not the purpose of this conference, please advise immediately.

I will be traveling to Aspermont and requesting that my client, Bob Denison travel to Aspermont with full intentions of receiving the above items and with the intentions that our law suit will be settled at that time.

Very truly yours,



STEVEN R. BIRD

SRB/dmb

cc: Mr. Bob Denison

Will be in Aspermont by 3PM

NO. 4222

IN THE MATTER OF THE ESTATE
OF

IDA BALDWIN DENISON,
DECEASED

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§
§
§
§
§

IN THE DISTRICT COURT OF

STONEWALL COUNTY, TEXAS

**MOTION FOR INVENTORY AND APPRAISEMENT TO BE FILED,
ACCOUNTING OF ESTATE TO BE FILED,
AND REMOVAL OF INDEPENDENT EXECUTOR OF THE ESTATE**

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Bob Marshall Denison, Plaintiff, by and through his attorney of record, who filed this Motion for Inventory and Appraisement to be Filed, Accounting of Estate to be Filed, and Removal of Independent Executor of the Estate, and County of Stonewall Co. Texas thereof would show the Court the following:

FILED

FEB 3 1999

BETTY L. SMITH, Clerk
County of Stonewall Co. Texas
Clerk/Deputy

I.

No inventory has been filed in the above Estate and no request for extension to file an inventory has been filed, said request for extension being required to be filed within 90 days from the order admitting the 1997 Will of Ida Baldwin Denison, Deceased, to probate.

II.

No accounting has been filed by the duly named Independent Executor of the Estate, and over a one-year time period has passed since the order admitting the 1997 Will of Ida Baldwin Denison, Deceased, to probate.

III.

Request is made that the Court order the duly named Independent Executor of the Estate to file a full and complete inventory and appraisement of the Estate, including list of claims,

and that a full and complete accounting of the Estate be filed setting forth all actions of the Estate since the order admitting the 1997 Will of Ida Baldwin Denison, Deceased, to probate.

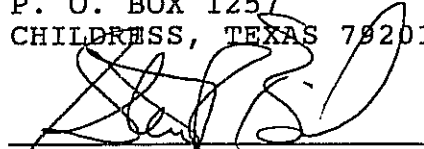
IV.

Further, due to the lack of diligence in managing the Estate by failure to file the inventory and appraisement as required by the Texas Probate Code, the Independent Executor should be removed by the Court as Independent Executor, and a Temporary Administrator should be named by the Court to further administer the Estate pending the disposition of this cause of action.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that the Court order an Inventory, Appraisement, and List of Claims be filed immediately, and accounting of the Estate be prepared and filed within a time period set by the Court, that the Independent Executor be removed, and that a Temporary Administrator be named until further order of the Court.

Respectfully submitted,

BIRD & BIRD
ATTORNEYS AT LAW
P. O. BOX 1257
CHILDRESS, TEXAS 79201

BY: 

ATTORNEY FOR PLAINTIFF

TELEPHONE NO.: 940-937-2543
TELECOPIER NO.: 940-937-3431
STATE BAR NO.: 02333400

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was placed in the U. S. Mail in a properly addressed envelope on this the 29 day of January, 1999, to:

Isaac M. Castro
Attorney at Law
Castro & Davis
212 South Central
Hamlin, Texas 79520



STEVEN R. BIRD