

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

In re:	§	CHAPTER 11
	§	
COBALT INTERNATIONAL ENERGY	§	Case No. 17-36709 (MI)
INC, <i>et al</i>	§	(Jointly Administered)
Reorganized Debtors	§	
	§	

SPRING BRANCH INDEPENDENT SCHOOL DISTRICT, CITY OF HOUSTON, AND
SHELDON INDEPENDENT SCHOOL DISTRICTS’ SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS

To: Nader Tavakoli, Plan Administrator, by and through his attorneys of record, Shari L. Heyen and David R. Eastlake, Greenberg Traurig, LLP, 1000 Louisiana Street, Suite 1700, Houston, Texas 77002.

In accordance with FED. R. CIV. P. 26 and 34, and FED. R. BANKR. P 7026 and 7034 , Spring Branch Independent School District and the City of Houston (the “School and City”) by and through the undersigned counsel, hereby request that Plan Administrator to produce documents to Owen M. Sonik, Counsel for Spring Branch Independent School District and the City of Houston, 1235 North Loop West, Suite 600, Houston, Texas 77008, for inspection and copying the documents described below within thirty (30) days of service of this First Request for Production (“Request”). You are instructed to refer to the “DEFINITIONS” AND “INSTRUCTIONS” sections of this Request in preparing your responses.

DEFINITIONS

The following terms have the following meanings, unless the context requires otherwise:

“DOCUMENT” or “DOCUMENTS” means all materials within the full scope of FED. R. CIV. P. 34 and FED. R. BANKR. P. 7034 including but not limited to: all writings and recordings, including the original and non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but with limitation to,



email and attachments, correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes, and amendments of any of the foregoing) graphic or aural representations of any kind (including without limitation, photographs, charts, microfiche, microfilm, videotape, recordings, motion pictures, plans, drawings, surveys), and electronic, mechanical, magnetic, optical, or electric records or representations of any kind (including without limitation, computer files and programs, tapes, cassettes, discs, recordings), including metadata.

“RENDITION” means any Documents filed with the Harris County Appraisal District pursuant to Section 22.01 of the Texas Property Tax Code on or about April 9, 2018.

“CORRECTION MOTION” means any Documents filed with the Harris County Appraisal District pursuant to Section 25.25(d) of the Texas Property Tax Code on or about January 31, 2019.

“DEBTOR” means the Debtors, the Reorganized Debtors¹, or the Plan Administrator.

INSTRUCTIONS

A. The Documents sought by this Request shall include all documents within your possession, custody, control, or access, or within the possession, custody, control, or access of any of your agents, officers, employees, attorneys, or investigators (including investigators of an

¹ The Reorganized Debtors in these Chapter 11 cases are Cobalt International Energy, Inc., Cobalt International Energy GP, LLC, Cobalt International Energy, L.P., Cobalt GOM LLC, Cobalt GOM #1 LLC, and Cobalt GOM #2 LLC..

attorney), or any person acting as your representative or on your behalf, including, but not limited to, any otherwise independent attorney, accountant, or consultant.

B. This Request is continuing in nature, and if you or your agents or representatives acquire additional Documents regarding this Request, all such subsequently acquired Documents should be made available to counsel for Spring Branch Independent School District and the City of Houston.

C. The Documents shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond with the categories of this Request.

D. The production of Documents and files and other sources shall be performed in such a manner as to ensure that the file or other source from which a Document is obtained may be identified.

E. If any Document is withheld from production under a claim of privilege or other exemption from discovery (collectively "Privilege"), state the name and title or person invoking the Privilege. If applicable, state whether the Privilege is being invoked pursuant to an order delegating authority to invoke the Privilege. With respect to Documents withheld, state the title and nature of the Document, and furnish a list signed by the attorney of record giving the following information with respect to each Document withheld:

1. the name and title of the author and/or sender and the name and title of the recipient;
2. the date of the Document's origination;
3. the name of each person or persons (other than stenographic or clerical assistants) participating in the preparation of the Document;

4. the name and position, if any, of each person to whom the contents of the Document has heretofore been communicated by copy, exhibition, reading, or substantial summarization;
5. a statement of the specific basis on which Privilege is claimed and whether or not the subject matter of the contents of the Document is limited to that basis; and
6. the identity and position, if any, of the person or persons supplying the attorney of record signing the list with the information requested in the subparagraph above.

F. If you at any time had possession or control of a Document called for under this Request, and if such Document has been lost, destroyed, or is not presently in your possession or control, you shall describe the Document, the date of its loss, destruction, purge, or separation from possession or control, and the circumstances surrounding its loss, destruction, purge or separation from possession or control.

REQUEST FOR PRODUCTION

1. Any and all documents provided by Cobalt International Energy, LP to J. Joseph Consulting, Inc. 21732 Hardy Oak Blvd., Ste. 101, San Antonio, Texas 78258 for use in connection with the rendition of taxable property for tax year 2017.
2. Any and all documents provided by Cobalt International Energy, LP to J. Joseph Consulting, Inc. 21732 Hardy Oak Blvd., Ste. 101, San Antonio, Texas 78258 for use in connection with the rendition of taxable property for tax year 2018.
3. Any and all documents relating to the sale of any tangible personal property of Cobalt International Energy, LP from December 31, 2016 through December 31, 201

Respectfully submitted,

PERDUE, BRANDON, FIELDER, COLLINS & MOTT, L.L.P.
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/s/ Owen M. Sonik
Owen M. Sonik
Texas State Bar No. 18847250

Certificate of Service

I hereby certify that this 13th day of June, 2019, I caused a true and correct copy of the above and foregoing Spring Branch Independent School District, City of Houston, and Sheldon Independent School Districts' Second Request for Production of Documents to be served upon the following parties by the following means.

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Any other parties eligible to receive notice through the Court's ECF e-notice

/s/Owen M. Sonik
Owen M. Sonik