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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF INYO, MAIN COURTHOUSE

In re the Matter of the L.L. NUNN TRUST for the benefit of DEEP SPRINGS COLLEGE under Deed of Trust dated November 5, 1923	Case No. SICVPB 12-53232 Assigned for All Purposes to: Hon. Dean T. Stout **SPECIAL INTERROGATORIES, SET TWO** Date Action Filed: February 6, 2012 Trial Date: April 28, 2014

PROPOUNDING PARTY: Objectors/Respondents Kinch Hoekstra and Ed Keonjian, Trustees of The L.L. Nunn Trust

RESPONDING PARTY: David Hitz, Acting on behalf of the Board of Trustees of the L.L. Nunn Trust

SET NO.: Two

TO PETITIONER DAVID HITZ, ACTING ON BEHALF OF THE BOARD OF TRUSTEES, AND THEIR COUNSEL OF RECORD:

Pursuant to California Code of Civil Procedure section 2030.010 *et seq.*, objectors/respondents Kinch Hoekstra and Edward Keonjian, Trustees of the L.L. Nunn Trust hereby requests that Petitioner David Hitz, acting on behalf of the Board of Trustees, respond to the following interrogatories within thirty days of service.

INTERROGATORIES

SPECIAL INTERROGATORY NO. 25:

State the number of students who applied for admission to Deep Springs College in each of the past 15 years.

SPECIAL INTERROGATORY NO. 26:

State the number of students accepted for admission at Deep Springs College in each of the past 15 years.

SPECIAL INTERROGATORY NO. 27:

State the number of students newly enrolled at Deep Springs College in each of the past 15 years.

SPECIAL INTERROGATORY NO. 28:

For each student who completed his education at Deep Springs College in the past 15 years and within one year thereafter enrolled in another college or university, identify the college or university in which that student enrolled. For the purposes of this interrogatory, the student need not be named.

SPECIAL INTERROGATORY NO. 29:

For each student who completed his education at Deep Springs College in the past 15 years and within one year thereafter became employed or self-employed, identify the employer or nature of self-employment of the student. For the purposes of this interrogatory, the student need not be named.

SPECIAL INTERROGATORY NO. 30:

For each student who completed his education at Deep Springs College in the past 15 years and within one year thereafter attained an elected or appointed government office, identify the government and the elected or appointed government office attained by the student. For the purposes of this interrogatory, the student need not be named.

DATED: January 24, 2014

BROWNE GEORGE ROSS LLP
Eric M. George
Ira Bibbero

ORRICK, HERRINGTON & SUTCLIFFE LLP
Joseph C. Liburt

HEATHER M. HOEKSTRA

By _____
Eric M. George
Attorneys for Kinch Hoekstra, Edward Keonjian, Trustees of the L.L. Nunn Trust

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2400, Los Angeles, CA 90067.

On January 24, 2014, I served true copies of the following document(s) described as **SPECIAL INTERROGATORIES, SET TWO** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY OVERNIGHT DELIVERY: I enclosed said document(s) in an envelope or package provided by the overnight service carrier and addressed to the persons at the addresses listed in the Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight service carrier or delivered such document(s) to a courier or driver authorized by the overnight service carrier to receive documents.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 24, 2014, at Los Angeles, California.

Claudia Bonilla

SERVICE LIST

In re the Matter of the L.L. Nunn Trust for the benefit of Deep Springs College under the Deed of Trust dated November 5, 1923

INYO SUPERIOR COURT, Case No. SICVPB 12-53232

BAKER MANOCK & JENSEN, PC Christopher L. Campbell, SBN 116329 Jeffrey A. Jaech, SBN 076876 Dirk B. Paloutzian, SBN 173676 Amber M. Bridges 5260 North Palm Avenue, Suite 421 Fresno, CA 93704 Tel. (559) 432-5400 / Fax (559) 432-5620 CCampbell@bakermanock.com DPaloutzian@bakermanock.com ABridges@bakermanock.com JJaech@bakermanock.com	Counsel for David Hitz
Jon Michaelson K & L GATES, LLP 630 Hansen Way Palo Alto, CA 94304	Counsel for Deep Springs College Corporation
Ms. Tania M. Ibanez Supervising Deputy Attorney General Charitable Trusts Section California Attorney General's Office 300 S. Spring Street, Suite 1702 Los Angeles, CA 90013	Attorney General

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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Counsel for David Hitz

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Browne George Ross LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 24, 2014, at Los Angeles, California.

_____
Claudia Bonilla