

EXHIBIT A

- 1) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Necta Sane and Brad Deuster regarding, involving, discussing, mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.
- 2) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Necta Sane and Catherine Lane regarding, involving, discussing, mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.
- 3) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Carroll Robinson and Brad Deuster regarding, involving, discussing, mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.
- 4) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Carroll Robinson and Catherine Lane regarding, involving, discussing, mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.
- 5) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Chris Oliver and Brad Deuster regarding, involving, discussing, mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.
- 6) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Chris Oliver and Catherine Lane regarding, involving, discussing,

mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.

- 7) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Dave Wilson and Brad Deuster regarding, involving, discussing, mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.
- 8) Any and all communications, including e-mail, text messages, letters, notes, or memoranda, between Dave Wilson and Catherine Lane regarding, involving, discussing, mentioning, or relating to any one, or more, of the following topics: Houston Community College System, Houston Community College Board of Trustees, Houston Community College's \$425 million bond package, Renee Byas, Vidal Martinez, the Greater Houston Partnership, Gardere Wynne Sewell, Jarvis Hollingsworth, and Jacobs Management. This request encompasses the time period of January 1, 2013 to the present.

Unofficial Copy Office of Chief Clerk

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS

THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):
Custodian of Records for:

Brad Deuster and Catherine Lane c/o Yaffee Deuster
1330 Post Oak Blvd., Suite 1350
Houston, TX 77056 713-212-0700

to be and appear before a Notary Public of my designation for
Discovery Resource 713-223-3300
1511 West 34th Street, Houston, TX 77018

or its designated agent, on the forthwith day of Instanter at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records as described on the attached Exhibit 'A'

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: **Exhibit A**

at any and all times whatsoever, then and there to give evidence at the instance of the **Defendant**, represented by **Rusty Hardin**, Attorney of Record, in that Certain Cause No. **2014-55319**, pending on the docket of the **District Court of the 55th Judicial District of Harris County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

HOUSTON COMMUNITY COLLEGE

vs.

RENEE BYAS

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this 30th day of March, 2015 .



Cris Garza

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this 2 day of April, 2015 and executed this the 2 day of April, 2015,
in the following manner: By delivering to the witness Brad Deuster, a true copy hereof.

Returned this 2 day of April, 2015.

[Signature]
PROCESS SERVER

Order No. 44083.006

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS

THE STATE OF TEXAS

To any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under **RULE 176 OF TEXAS RULES OF CIVIL PROCEDURE**. - GREETINGS -

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for:

Brad Deuster and Catherine Lane c/o Yaffee Deuster
1330 Post Oak Blvd., Suite 1350
Houston, TX 77056 713-212-0700

to be and appear before a Notary Public of my designation for

Discovery Resource 713-223-3300
1511 West 34th Street, Houston, TX 77018

or its designated agent, on **May 2, 2015** at the office of the custodian and there under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying

Any and all records as described on the attached Exhibit 'A'

and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to: **Exhibit A**

at any and all times whatsoever, then and there to give evidence at the instance of the **Defendant**, represented by **Rusty Hardin** Attorney of Record, in that Certain Cause No. **2014-55319**, pending on the docket of the **District Court of the 55th Judicial District of Harris County**, Texas.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

HOUSTON COMMUNITY COLLEGE

vs.

RENEE BYAS

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND, this 20th day of March, 2015.



Cris Garza

NOTARY PUBLIC

176.8 Enforcement of Subpoena (a) Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

OFFICER'S RETURN

Came to hand this 14th day of APRIL, 2015, and executed this the 14th day of APRIL, 2015, in the following manner: By delivering to the witness STACY CHRISTIAN, a true copy hereof.

Returned this 14th day of APRIL, 2015

[Signature]
PROCESS SERVER