

EXHIBIT J

FROM: OMNIFAX

TO: 4098355177

JAN 17 2001 2:38PM #848 P.02

H

SUCCESSIONS OF

NO. 15405

H. J. LUTCHER STARK

* 14th JUDICIAL DISTRICT COURT
* STATE OF LOUISIANA
* PARISH OF CALCASIEU

*check 2906
230.00*

*R. Clayton
12/4/00*

12-4-00

[Signature]
Deputy Clerk of Court
Calcasieu Parish, Louisiana

**PETITION FOR SWORN DETAIL DESCRIPTIVE LIST,
FINAL ACCOUNTING AND
RECOVER DECEDENT'S ASSETS AND/OR FUNDS**

PAID BY P.L.

The petition of Ida Marie Stark, Individually and as Executor for the Estate of William Stark II and Randy Stark and Lynn Stark Barras and Williams Stark III, domiciled in the County of Orange, State of Texas, respectfully represent that:

1.

On May 5, 1972, William Stark II was recognized as the child and heir-at-law of the decedent and never placed in possession of certain property of the decedent enumerated in these proceedings. Since that time William Stark II has passed and Mrs. Ida Marie Stark, his wife and the Executor of his Estate, and his children, Randall Stark, Lynn Stark Barras and Williams Stark III remain.

2.

Petitioners constitute one-half of the children and heirs-at-law of the decedent with the exception of Nelda Stark, who is deceased and formally domiciled in the County of Orange and Homer Stark who is presently domiciled in the County of Orange, State of Texas who are made defendants herein.

3.

Petitioners have just recently discovered that during the proceedings defendant herein, Nelda Stark, who was formally named as Executrix of the decedent's estate, did in fact have possession of and conceal and omit substantial assets of the decedent from the rightful heirs, including the rights and proceeds of mineral leases and revenues, the amount of which was unknown and the value of

which were not determined by the Executrix. Petitioners believe that there are other assets of the decedent which were known to the said Executrix, but which were deliberately omitted by her as a neither a sworn Detailed Descriptive List nor Final Accounting was ever filed nor presented to the heirs causing the said property to be converted to her personal use during these proceedings by the

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intentional act of Nelda Stark in failing to notify the other heirs of assets and concealing said assets, and in appropriating and converting them to her own personal use with the intent to defraud petitioners of their rightful inheritance and conceal these assets from petitioners.

4.

Petitioners and the Succession herein are entitled to and demand a final accounting and a sworn detail descriptive list for any and all assets which defendant received from the decedent, and for a full accounting of the fulfillment of defendant's fiduciary duties to the decedent as a person entrusted with decedent's funds and assets, to the Succession as its named Executrix, and to petitioners herein.

5.

Petitioners aver that Nelda Stark who was an heir has embezzled and/or converted or concealed effects and assets belonging to the Succession and its heirs and is, therefore, entitled to no share of the property thus embezzled and/or converted or concealed pursuant to Article 1029 of the Louisiana Civil Code. Alternatively, should the Court find that any portion of the assets in decedent's possession did constitute valid gifts which were concealed from the knowledge of petitioners and were not enumerated as there was never a sworn Descriptive List nor final accounting filed herein, petitioners demand collation of these gifts, in accordance with law.

6.

Petitioners further demand accounting from Nelda Stark and/or the Estate of Nelda Stark and reimbursement for interest of all the assets in defendant's possession, as agent for the decedent, as well as reimbursement for interest on all funds and assets due to the Succession and petitioners herein, and other damages petitioners have suffered as a result of the actions described herein and the conversion of property by the defendant.

7.

Because of the concealment of assets and mismanagement described herein, and because Nelda Stark is deceased, Nelda Stark should be decreed disqualified to serve as Executrix of this Succession, and Randy Stark, grandson of the deceased, should be appointed Executrix herein and

Letters Testamentary should be issued to said Randy Stark, without be in accordance with law.

8.

To the extent that the Judgment of Possession, originally rendered herein, recognizes Nelda Stark as an heir or legatee of the decedent, with respect to items knowingly concealed from

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petitioners, and to the extent that such judgment is based upon the fraud and ill practices of Nelda Stark, petitioners are entitled to judgment declaring the said Judgment null, due to fraud and ill practices on the part of Nelda Stark, and vacating the said Judgment, in accordance with law. These proceedings do not need to be reopened as they were never closed as no final accounting was ever submitted nor the Executrix discharged.

WHEREFORE, petitioners pray that due proceedings be had and that there be judgment herein in favor of petitioners and against Nelda Stark and/or the Estate of Nelda Stark:

1. Decreeing Nelda Stark disqualified and appointing Randy Stark Testamentary Executrix, without bond;
2. Ordering a final accounting and detailed descriptive list filed by Nelda Stark and/or the Estate of Nelda Stark for any and all funds held by defendant or received by defendant for or from the decedent;
3. For judgment in favor of petitioners and against Nelda Stark and/or the Estate of Nelda Stark, placing petitioners in possession of said assets of the decedent, presently held by the said Nelda Stark and/or the Estate of Nelda Stark, and declaring that defendant shall have no share in the property thus concealed;
4. Ordering the collation of any assets advanced to Nelda Stark and/or the Estate of Nelda Stark as bona fide gifts during decedent's lifetime; and such further orders and judgments as are requisite and necessary to place petitioners in possession of their shares of the funds of the decedent described herein, and for legal interest on all said funds, from the date they came into possession of the defendant, and for such other damages as petitioners shall prove herein; and recognizing petitioners as the heirs-at-law and legatees of the decedent and placing them in possession of the property allowed by law and to the property of the decedent subsequently discovered in the possession of and concealed by the said Nelda Stark and/or the Estate of Nelda Stark; and
5. For all other legal and equitable relief, as the Court shall deem necessary and proper

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Respectfully submitted:
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L. CLAYTON BURGESS (22979)

Attorney for Ida Marie Stark, individually and
as Executor of the Estate of William Stark II
and Randall Stark, William Stark III and Lynn
Stark Barras

CERTIFICATE

I HEREBY CERTIFY that a copy of the above and foregoing has this day been forwarded to
all counsel of record via facsimile and/or by placing same in the United States Mail, postage paid
and properly addressed.

Lafayette, Louisiana, this 30 day of November, 2000.



L. CLAYTON BURGESS