

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

**ROBERT SULLIVANT, SR.,
PLAINTIFF,**

v.

**ROBERT SULLIVANT, JR.,
DEFENDANT.**

CASE NO. 2021-612(W)

**ROBERT SULLIVANT JR.,
THIRD-PARTY PLAINTIFF,**

v.

**ROBERT SULLIVANT SR.,
and EVELYN STEVENS,**

AFFIDAVIT OF ROBERT SULLIVANT JR

I, Robert Sullivant Jr, do hereby declare the following facts on the basis of personal knowledge.

1. I am the Defendant and Third-Party Plaintiff in this matter.
2. I believe that Your Honor's oversight of this case has been biased in favor of Mr. Alford.
3. Your Honor has testified inappropriately to my character and to my love for my father.
4. Your Honor referred to me as a "hooligan sandbag" in court and on the record.
5. Your Honor has testified to disputed facts at multiple hearings.

6. The funds from the land sale were to be held in trust by Mr. Alford. Mr. Alford admits to violating this court order for months. He admits to knowingly allowing a \$41,000 purchase to be made from the account and failed to reconcile the account until I drafted a TRO. The court, despite being fully aware of this, did not admonish Mr. Alford whatsoever.
7. Your Honor mercilessly admonished JR on the record for a simple harmless error made by a pro se litigant.
8. Your Honor refused to hear a motion to disqualify Mr. Alford on the sole basis of public perception and clamor, and refused to hear a motion to disqualify, stating that “the Bar Association will deal with it.” The Bar Association cannot rule on JR’s Motion to Disqualify, and that is not what they are tasked with deciding. Your Honor refused to exercise his jurisdiction and attempted to pass the responsibility for deciding a motion in his court onto the Bar Association.
9. I have submitted multiple affidavits to the court stating that I was never informed of the revocation of the power of attorney under Mississippi law. Your Honor continuously fails to acknowledge this fact.
10. Your Honor has allowed a court appointed expert witness to ignore communication from JR, stating that this is due to Dr. Perkins “policy”, that he only deals with the party that hired him. Dr. Perkins was retained by this court, not by Mr. Alford as a personal expert.
11. Your Honor has prejudiced JR by allowing witnesses to be called with no notice to him, deciding a conservatorship with no formal hearing, and using his own observations and disputed testimony, including testimony about the character of JR, to influence his decisions.
12. A reasonable person would harbor doubts as to Your Honor’s impartiality in this matter and recusal is appropriate to ensure a fair and impartial trial.

I, Robert Sullivant Jr, state the forgoing on the basis of personal knowledge and under penalty of perjury.

Dated: June __, 2023.

/s/ _____
Robert Sullivant Jr.
Defendant and Third-Party Plaintiff