

Exhibit B

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

ROBERT SULLIVANT, SR.

FILED
STATE OF MISSISSIPPI
LAFAYETTE COUNTY
2023 APR 21 PM 4:34

PLAINTIFF

VS.

CHANCERY CLERK

CAUSE NO.: 2021-612(W)

ROBERT SULLIVANT, JR.

BY DC

13

DEFENDANT

REQUEST FOR PERMISSION FOR ROBERT SULLIVANT, SR. TO EXECUTE A WILL

COMES NOW Swayze Alford as attorney for and on behalf of Robert Sullivan, Sr., pursuant to Miss. Code Ann. § 93-20-414(i) and requests leave of Court for preparation of a will and have Robert Sullivan, Sr. execute a will. In support thereof, the undersigned would show:

1. Robert Sullivan, Sr. has submitted to two Independent Medical Examinations. Pursuant to one affidavit, he was found to be in need of a conservator for financial matters. In a second affidavit, he was found to be in need of a conservator for both general and financial matters.
2. Sullivan, Sr. has been living in Ellison assisted-living facility for several months. Sullivan, Sr. jointly owns a home with his son, Robert Sullivan, Jr. Sullivan, Sr. has not been to the home in many months. Sullivan Sr. is not in possession of any prior wills.
3. Sullivan, Sr. has indicated to undersigned a desire to create a new will.
4. Based on undersigned's interviews and many conversations with Sullivan, Sr. he has demonstrated he has testamentary capacity and knows exactly how he wants his estate to be devised.
5. The undersigned is prepared to have the Court interview Sullivan, Sr., in camera, to address these issues as well.

SCANNED

WHEREFORE, PREMISES CONSIDERED, the undersigned asks leave of Court to revoke any prior wills and for preparation of a will and have Robert Sullivant, Sr. execute a will, consistent with his wishes while he is still capable of expressing those wishes.

RESPECTFULLY SUBMITTED this 21 day of April, 2023.

BY: Swayze Alford
SWAYZE ALFORD (MSB #8642)

OF COUNSEL:

SWAYZE ALFORD
Attorney at Law
1221 Madison Avenue
Post Office Box 1820
Oxford, Mississippi 38655
(662) 234-2025 phone
(662) 234-2198 fax

Counsel for Robert Sullivant, Sr.

CERTIFICATE OF SERVICE

I, Swayze Alford, attorney for Robert Sullivant Sr., do hereby certify that I have this day forwarded, via email, a true and correct copy of the above and foregoing *Request for Permission for Robert Sullivant, Sr. to Execute a Will* to the following:

Robert Sullivant, Jr.
robert@steelandbarn.com

SO CERTIFIED, this the 21 day of April, 2023.

Swayze Alford
SWAYZE ALFORD (MSB #8642)