

**ROBERT SULLIVANT, SR. vs ROBERT SULLIVANT, JR.  
Mary H. 'Evelyn' Stevens on 11/15/2022**

1 IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

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4 ROBERT SULLIVANT, SR.,

5 Plaintiff,

6 vs.

Cause No. 2021-612(W)

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ROBERT SULLIVANT, JR.,

8

Defendant.

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Deposition of

12

MARY H. "EVELYN" STEVENS

13

November 15, 2022

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15

[Appearances Noted Herein]

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Taken at Courtroom 1 of Lafayette Chancery Courthouse

18

300 N. Lamar, Oxford, Mississippi

Tuesday, November 15, 2022, at 8:55 a.m.

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2     Appearances:

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10

11            REPRESENTING Plaintiff

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18

19            REPRESENTING Defendant

20

21

22

23     Also present:

24

25     Robert Sullivant, Sr.

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STIPULATION

It is stipulated by and between the parties that the deposition of Mary H. "Evelyn" Stevens is being taken pursuant to notice under the Mississippi Rules of Discovery.

All objections, except to the form of the question, are reserved until such time as the deposition, or any part thereof, is sought to be introduced into evidence.

All formalities, excluding the reading and signing of the deposition by the deponent, are waived.

1 MARY H. "EVELYN" STEVENS

2 having been first duly sworn, was examined under oath  
3 and testified as follows:

4 BY MR. SULLIVANT: All  
5 right. Just jump on in?

6 BY MR. ALFORD: Well,  
7 typically depositions are  
8 taken pursuant to the Rules of  
9 Civil Procedure, meaning that  
10 all objections other than to  
11 the form of the question are  
12 reserved until such time as  
13 they might be presented at  
14 trial.

15 BY MR. SULLIVANT: Okay.

16 BY MR. ALFORD: So I  
17 propose that we stipulate to  
18 that.

19 BY MR. SULLIVANT: I  
20 agree. I would like to make a  
21 proposal, too, or a  
22 stipulation. Since my father  
23 and I have the same last name,  
24 Mr. Sullivant, Senior, and I  
25 am Sullivant, Junior, and as

1 we are referring to each  
2 other's name, could we use  
3 Senior and Junior, just to  
4 make it clear who we are  
5 speaking of so we are not  
6 getting confused for the  
7 court reporter or when  
8 referring back to Senior or to  
9 Junior, could we use those  
10 terms?

11 BY MR. ALFORD: Well, I  
12 want it to be clear obviously  
13 but I think Evelyn refers to  
14 him as Mr. Bob when she's  
15 talking about your dad.

16 BY MR. SULLIVANT: That  
17 will be fine with me.

18 BY MR. ALFORD: That  
19 good with you?

20 A. [Witness nods head up and down.]

21 BY MR. ALFORD: You need  
22 to answer out loud. I know  
23 we just talked --

24 A. Yes, that's good with me.

25 BY MR. ALFORD: She's

1 not going to be looking at  
2 you when you are nodding your  
3 head or shaking your head, --

4 A. Okay.

5 BY MR. ALFORD: -- okay?

6 A. Okay.

7 BY MR. SULLIVANT: Okay.

8

9 So I will begin.

10

11 EXAMINATION BY MR. SULLIVANT:

12 **Q. All right. First question, when did you start**  
13 **working as a sitter for Senior? About what time was**  
14 **that?**

15 A. I'm not really sure but I believe it was  
16 around May or June of '18, but I'm not exactly  
17 positive.

18 **Q. Okay. What was your job description?**

19 A. To cook and clean and take Mr. Bob to the  
20 doctors' visits or where he needed to go.

21 **Q. Okay. What are some examples of places where**  
22 **he needed to go?**

23 A. Doctors' offices, Wal-Mart, Home Depot.

24 **Q. Okay. Where did this take place at?**

25 A. Sometime in Oxford, sometime in Batesville.

1 Q. When did -- when you began working, where was  
2 it -- where was this work occurring --

3 A. At --

4 Q. -- at the very beginning?

5 A. At 106 Crawford Circle.

6 Q. Okay.

7 A. Oxford.

8 Q. While working at the Crawford house, at least  
9 the first time when you worked there, and you mentioned  
10 you took places -- you took him where he needed to go,  
11 did y'all go on any, like, just joy rides?

12 BY MR. ALFORD: Object to the  
13 form.

14 A. Well, we went to the farm a lot.

15 Q. [Mr. Sullivant] Okay. Did y'all just drive  
16 around, say, Enid Lake or anyplace like that just for  
17 the heck of it?

18 A. Well, we might've went by Chickasaw on the way  
19 to Pope to look at the water.

20 Q. Okay. At that time who did you report to in  
21 your capacity?

22 A. Ah, you.

23 Q. Okay. Who determined your schedule?

24 A. You.

25 Q. Okay. How were you paid?



1 A. Paypal.

2 Q. Okay. Could you describe that a little bit  
3 more?

4 A. I made \$15.00 an hour.

5 Q. Okay. When you said Paypal, how did that work  
6 exactly?

7 A. You paid me, ah, through Paypal.

8 Q. Okay. Good enough. So, you said how much you  
9 made. Did you declare these amounts that I paid you  
10 through Paypal, did you declare them as income on your  
11 income taxes?

12 A. No.

13 Q. Okay. Did you pay payroll taxes on these  
14 amounts?

15 A. No.

16 Q. Okay. When did Senior move back to the  
17 farmhouse in Pope, another house that we own, and you  
18 sometimes said you worked in Pope. When did that  
19 begin?

20 A. I can't exactly remember. I think about 2020.

21 Q. Okay. Maybe June or July?

22 A. Maybe. I'm not exactly sure.

23 Q. Do you recall me asking you if you -- do you  
24 recall if you -- asking me if you were still going to  
25 work for us because -- because since -- because Senior

1 had moved back to Pope?

2 A. Yes.

3 Q. Okay. What did I respond? What was my  
4 response?

5 A. Yes.

6 Q. Do you recall if I said why he moved back to  
7 the farmhouse?

8 A. No.

9 Q. You don't? Okay. Do you keep -- so you did  
10 keep working and you drove to the Pope farmhouse. Did  
11 you ask to get paid more money for the drive time?

12 A. Ah, yes.

13 Q. Okay. How often did you work at the  
14 farmhouse, more or less than you did when you were at  
15 Crawford -- the Crawford house?

16 A. Basically about the same hours.

17 Q. Okay. What was your -- did your job  
18 description change at all, the things that you did  
19 there as compared to Crawford? Did anything change as  
20 far as the things you did?

21 A. Yes.

22 Q. For example?

23 A. We, ah, took care of the property, mowed the -  
24 - took care of the property.

25 Q. Did Senior ever say why he moved from Crawford

1 to the farmhouse in Pope?

2 A. I think he was not happy.

3 Q. Did he say why he was not happy?

4 A. Ah, he just wanted to be on the farm.

5 Q. That's all he said, he just wanted to be on  
6 the farm?

7 A. As far as I recall.

8 Q. Okay. How often did you drive him around  
9 while you were doing the work at the farmhouse, say, on  
10 joy rides, just rides for fun?

11 A. Well, we didn't usually take joy rides for  
12 fun. We would go to Wal-Mart if he needed.

13 Q. Okay. Did you ever drive him, during this  
14 time period, while you worked for me and you were going  
15 over to the farmhouse in Pope, did you ever take him,  
16 say, down to the lake or over to Calvin Vick's house?

17 A. Yes.

18 Q. About how many times?

19 A. Maybe five.

20 Q. What were the -- how long were the visits?

21 A. Maybe 15 minutes.

22 Q. What was the nature of the visits?

23 A. To just see how he was doing.

24 Q. Okay. When did you first meet Calvin Vick,  
25 who is my cousin on my mother's side?

1 A. Ah, well, I met Calvin years ago. I just met  
2 him but I really didn't know him.

3 Q. Okay. So you had known Calvin Vick prior to  
4 being employed by Junior and Senior?

5 A. Well, just -- I knew him when I saw him. I  
6 didn't actually --

7 Q. Okay.

8 A. -- know him.

9 Q. He seemed familiar?

10 A. Yes.

11 Q. Okay. When did you first meet him when you  
12 were at -- doing work at the Crawford farmhouse? When  
13 did he -- when did you first see him and realize that  
14 he was my cousin and how far away -- that he lived  
15 close by?

16 A. Ah, I think when he came over there one day.

17 Q. Was that at the beginning of the --

18 A. Maybe --

19 Q. -- did he just show up?

20 A. Maybe about two or three months after Mr. Bob  
21 had moved to Pope.

22 Q. Okay. How far does Calvin Vick live from the  
23 Pope farmhouse?

24 A. A eighth or quarter of a mile, somewhere  
25 between that.

1 Q. Did Senior ever mention Calvin Vick's brother,  
2 Sam Vick or Sam Vick's son, Josh Vick? Did he ever  
3 mention those people?

4 A. Yes.

5 Q. In what way or how or what was the occasion?

6 A. That Sam was Calvin's brother and Josh was  
7 Sam's son.

8 Q. Did you ever meet Sam Vick or Josh Vick?

9 A. No.

10 Q. No. Are you aware of Senior going to Calvin  
11 Vick's house on his own while you were -- during that  
12 time of employment?

13 A. No.

14 Q. Okay. How often did Calvin Vick come over to  
15 the farmhouse?

16 A. I think he went -- went over there one time.

17 Q. So the whole time you were working there, he  
18 came -- Calvin only came over one time?

19 A. I think so.

20 Q. Okay. In your opinion was the farmhouse safe  
21 for Senior to live in, meaning safer than, say,  
22 Crawford -- the Crawford house for a man his age and in  
23 his condition?

24 A. Ah, I think it was.

25 Q. Okay. Do you think he would have been better

1 off, in your opinion, or more safe or better -- better  
2 taken care of health wise if he would've lived at the  
3 Crawford house instead of the Pope house?

4 A. No.

5 Q. No? Okay. Did you ever, while you were in  
6 the employment at the Pope house, did you ever call me  
7 to tell me that Senior had received what you thought  
8 was a scam phone call and he had given them a credit  
9 card number?

10 A. Yes.

11 Q. How often did that happen?

12 A. I think once.

13 Q. Just once?

14 A. [Witness nods head up and down.]

15 Q. When did I tell you about Senior writing  
16 checks to what I believed were scam solicitors that  
17 sent him mail?

18 A. Prior to that but I guess after we moved to  
19 the Pope house.

20 Q. So I told you that or you -- I told you that  
21 and you were aware of it before he moved over to the  
22 Pope house?

23 A. Yes.

24 Q. Okay. When did I tell you that I was getting  
25 his outgoing and incoming mail at the farmhouse and

1 intercepting the scam -- what I thought was scam mail  
2 solicitors from his normal mail?

3 A. Shortly after we moved to the Pope house.

4 Q. Okay. Did you agree to start getting his mail  
5 for me?

6 A. Yes.

7 Q. Okay. What did you do with that mail?

8 A. Gave it to you.

9 Q. Did you put it anywhere?

10 A. Oh, yeah. I left it at the Pope house so you  
11 could pick it up.

12 Q. Where did you put it at the Pope house?

13 A. In the bedroom drawer.

14 Q. Okay. When did Senior find out that you were  
15 getting the mail for me?

16 A. Mmm, I don't remember.

17 Q. But at some time he did find out?

18 A. I think so, yes.

19 Q. You think so. Did he say anything to you?

20 A. I think he saw the mail.

21 Q. He -- what do you mean he saw the mail?

22 A. I think he went in -- he was looking for  
23 something and he saw a stack of mail.

24 Q. So, just by chance -- you're stating that he  
25 went into that bedroom and went into that drawer and

1 found mail?

2 A. Yes, I believe so.

3 Q. Okay. Did he confront you about it?

4 A. Yes.

5 Q. What did he say?

6 A. He just said that, ah, What is this mail? And  
7 I told him I had been putting it there.

8 Q. Okay. Did you tell him that I'd asked you to  
9 do that?

10 A. I don't think I did.

11 Q. You didn't? You just said you were doing it  
12 on your own?

13 A. Well, he -- no. I told him I was putting it  
14 there for him. For...

15 Q. For who?

16 A. I was putting the mail -- he asked me what the  
17 mail was doing there and I told him that you were  
18 picking it up.

19 Q. Okay. Did he ask anymore questions about why  
20 I was doing that? Why I wanted you to do that?

21 A. I don't think so.

22 Q. Was he okay with it?

23 A. No.

24 Q. What did he say or what was his -- what did he  
25 say in regards to that? Was he happy or sad or?



1 A. He was kinda agitated.

2 Q. Okay. Did -- how -- how did you know he was  
3 agitated? Did he say anything?

4 A. Ah, no. I could just tell by the way he act.

5 Q. Did he say to stop doing that?

6 A. Uh, no I don't think he did.

7 Q. So, he was okay with you continuing to get his  
8 mail?

9 A. I think he said he was going to talk to you  
10 about it.

11 Q. Okay. All right. During that time when you  
12 were employed at the Pope farmhouse did you ever ask me  
13 for any of the old household items that we were not  
14 using around the house?

15 A. Well, yes.

16 Q. Okay. Do you have any examples of what?

17 A. You gave me a T.V. that y'all weren't using.

18 Q. Okay. Anything else?

19 A. Mmm, I think so but I can't remember what it  
20 was?

21 Q. Did I give you a freezer?

22 A. Yes.

23 Q. Okay.

24 A. Well, I bought the freezer.

25 Q. Okay. You bought the freezer.

1 A. Um-hmm. [indicating yes]

2 Q. Okay. Like, a water sprayer?

3 A. Water sprayer?

4 Q. Yes. A Stanley plug-in water compressor  
5 sprayer thing you wash your car with.

6 A. Oh, yeah, Mr. Bob give me that but it didn't  
7 work.

8 Q. Okay. Did you ever bring your brother over to  
9 the Crawford house to pick up some items that you  
10 thought we did not anymore or want and had asked for?

11 A. No.

12 Q. You did not? All right. So your brother did  
13 not come over in a pick up truck and pick up a smoker  
14 and a few other items?

15 A. My brother did get a smoker but I don't think  
16 he's the one that came and got it.

17 Q. Okay. Who came and got it?

18 A. I can't remember.

19 Q. Okay. When did you learn that my father had  
20 taken the farm equipment, meaning the tractor -- two  
21 tractors and a disk and a bush hog over to Calvin  
22 Vick's house?

23 A. Ah, after Mr. Bob called me.

24 Q. Okay. What -- what did he say? I mean, did  
25 he say, I just brought them over there or?

1 A. He took them over there because he knew the  
2 farm was going to sell.

3 Q. Okay. Did he say he had made any arrangements  
4 with Calvin?

5 A. He said he was going to take them over to  
6 Calvin's --

7 Q. Or Mr. Vick?

8 A. Yes. -- just to keep them over there because  
9 the property was selling and he -- they didn't go with  
10 the property.

11 Q. Okay. But he did not say how long he planned  
12 on Cal -- Mr. Vick to -- was going to keep the  
13 equipment for him?

14 A. No.

15 Q. He didn't specify? He didn't give you any  
16 indication of that?

17 A. He did not.

18 Q. While you were living at the farm -- while you  
19 were working at the farmhouse in Pope, did you have any  
20 other sitter/clients besides -- besides Senior?

21 A. Yes.

22 Q. Okay. Who were they and where did they live?

23 A. Ah, they were Mr. and Mrs. Fortner and they  
24 lived in the Delta.

25 Q. Could you spell that for us, please?

1 A. F-o-r-t-n-e-r.

2 Q. Thank you. Where in the Delta do they live?

3 A. Lambert.

4 Q. Lambert. How often did you work for them?

5 A. Ah, two days a week.

6 Q. What was the arrangements as compared to what

7 you had with us -- with Senior at the farmhouse?

8 A. Ah, they were elderly and I went down there

9 after I left Mr. Bob's and stayed with them until the

10 next morning.

11 Q. Okay. Good enough. Now, you mentioned the

12 farm was going to sell. When did -- when did Senior

13 move back to the Crawford house due to the sale of the

14 house?

15 A. Ah, may have been April of 2021. I don't know

16 exactly when the house sold.

17 Q. Okay. Well, the -- did you ask me if you were

18 still going to work for us after he moved back to the

19 Crawford house?

20 A. I'm sure I did, yes.

21 Q. Okay. And then what did I respond with?

22 A. Yes.

23 Q. Did I say anything else? I just said 'yes'

24 and that was it?

25 A. I think so.

1 Q. Okay. After Senior moved back to the Crawford  
2 house and you are still reporting to me, did you ever  
3 go on any joy rides or how were things -- let me back  
4 up. I'm sorry. Let me back up.

5 Were your duties any different when Senior  
6 moved back to the Crawford house were your duties any  
7 different than they were before?

8 A. No. Just clean and take him to the doctor's  
9 office, clean the house and, uh, cook if I needed to  
10 cook.

11 Q. Okay. Did you go on any joy rides with him?  
12 Just, say, driving around just for the fun of driving  
13 around?

14 A. Well, I would take him to Wal-Mart and to his  
15 doctors' visits and that's about it.

16 Q. Okay. During that period when I was still  
17 paying you and you reported to me and I decided your  
18 schedule, did you ever drive him back down to Pope to  
19 see Calvin, then Mr. Vick?

20 A. Uh, I'm sure I did.

21 Q. Okay. Any other joy rides, you know, just  
22 say, he asked, I just want to drive around somewhere  
23 and see the trees and the roadside?

24 A. Once -- about once a month we would go to  
25 Coleman's Bar-B-Q in Senatobia because he liked to eat

1 there.

2 Q. How many times did that occur?

3 A. About once -- once a month. We still do that.

4 Q. Do you recall when I told you I had to -- I  
5 wanted to put Senior in a conservatorship?

6 A. No.

7 Q. You do not? Okay. You don't recall one day I  
8 explained to you I would like -- I had decided to put  
9 him in a conservatorship because I couldn't manage him  
10 writing all the checks to the scam solicitors and  
11 giving people --

12 A. Oh, yeah.

13 Q. -- his credit card numbers and --

14 A. Uh-huh. [indicating affirmative]

15 Q. -- and I decided that the time had come for  
16 that to happen?

17 A. [Witness nods head up and down.]

18 Q. About when was that?

19 A. Ah, maybe after he moved back to Crawford  
20 Circle.

21 Q. Right. Did I say anything else? Did I -- do  
22 you recall what I said exactly or in general what I  
23 said?

24 A. Just what you said.

25 Q. Okay. Did I state what I would have to do to

1 do that?

2 A. No.

3 Q. Okay. Do you recall me saying I had made  
4 Senior an appointment with Dr. Linder in Batesville for  
5 a mental evaluation so I could proceed with a  
6 conservatorship?

7 A. Yes.

8 Q. Okay. Did you take him to that appointment?

9 A. Yes.

10 Q. Could you -- could you tell us what happened  
11 at that appointment?

12 A. The per -- the psychiatrist he was suppose to  
13 see was not there that day.

14 Q. Did he not see Dr. -- Dr. Linder?

15 A. Yes.

16 Q. What -- what did he -- what did he say or were  
17 you in the room when he examined my father or saw my  
18 father or saw Senior?

19 A. Yes.

20 Q. Okay. What -- what did he -- Dr. -- Dr.  
21 Linder do as far as procedures or what did he do for my  
22 father?

23 A. I think he cut his toenails.

24 Q. Cut his toenails? Okay. I'm a little  
25 confused. You stated that the psychiatrist was not

1 there that day? Was he suppose -- I don't quite  
2 understand that. Could you explain that a little bit  
3 more?

4 A. I think he was suppose to go in for a mental  
5 evaluation.

6 Q. Okay.

7 A. I'm not for sure.

8 Q. Okay. All right. Did you tell Senior that --  
9 that visit -- that appointment with Dr. Linder was to  
10 be a mental evaluation to be used in a conservatorship  
11 proceeding?

12 A. Yes.

13 Q. When did you tell him that?

14 A. After he got his toenails cut and he asked me  
15 why we went over there for that visit.

16 Q. All right. So at that time you told him that  
17 I was trying to put him a conservatorship and I made  
18 that appointment for that purpose?

19 A. No. I told him he was suppose to go in for a  
20 mental evaluation.

21 Q. Okay. But there was not one done?

22 A. No.

23 Q. Okay. Because you said -- because it was not  
24 done because the psychiatrist was not there that day?

25 A. Whoever was suppose to evaluate him was not



1 there. She was sick.

2 Q. I see. All right. During the time period  
3 when you're back at the Crawford house doing work  
4 there, after the farm had sold or was about to close,  
5 do you recall looking at houses for sale in Batesville  
6 on the Zillow dot com website?

7 A. Yes.

8 Q. Okay. Could you tell us some more about that?

9 A. Mr. Bob did not like living at Crawford Circle  
10 and he wanted to find a house closer to Batesville.

11 Q. Okay. Did he say why he did not like living  
12 in the Crawford house?

13 A. Because he wanted to be closer to Pope.

14 Q. Okay. Good enough. What was your role in him  
15 trying to find a house on Zillow or did he ask you --  
16 did he ask you, Come help me find a house on Zillow  
17 dot com?

18 A. No. Basically he was looking for his own  
19 houses and when he found them he would tell me where  
20 they were at.

21 Q. Okay. Did he show them to you on the Zillow  
22 website?

23 A. Ah, no.

24 Q. He did not? So, I'm confused. He just stated  
25 that he just saw them on Zillow dot come and told you

1 that he found one that he liked?

2 A. No. He found them when he was, ah, riding  
3 down the road or he would see a For Sale sign and he  
4 would tell me about them.

5 Q. Okay. But he didn't find any houses on the  
6 Zillow website that he liked and showed you?

7 A. Ah, no.

8 Q. He did not. Okay. So, -- but he did show you  
9 the Zillow website on the computer? Would you -- did  
10 he -- did he ask you to come into his room and look at  
11 the houses on Zillow dot com?

12 A. Ah, I can't remember but he might have.

13 Q. Okay. So you don't recall going into his room  
14 and having the door closed for half an hour or an hour  
15 and looking at houses on Zillow dot com with Senior?

16 A. Ah, no.

17 Q. You do not -- you do not remember that? Did  
18 Senior say he wanted to buy a house?

19 A. Yes.

20 Q. And his plan, he was going to buy this house  
21 by himself?

22 A. Yes.

23 Q. Okay. Did he ask you to call a real estate  
24 agent?

25 A. Ah, yes.

1 Q. Did you call a real estate agent?

2 A. I think so.

3 Q. Okay. Was it about a specific house?

4 A. Ah, I think so.

5 Q. Okay. If you could, could you maybe try to  
6 recall if it was about a specific house or just to find  
7 a house for him in general?

8 A. It was about a specific house.

9 Q. Okay. Do you remember where that specific  
10 house was?

11 A. I think it was over toward Independence.

12 Q. Okay. What did the real estate agent do or  
13 what did you ask the real estate agent to do?

14 A. Nothing. We just called about it to see how  
15 much it was. It was a house that had went into  
16 foreclosure.

17 Q. Okay. What did you find -- what did the real  
18 estate agent tell you?

19 A. Ah, just, I guess, the price of the house.

20 Q. Okay. But the price of the house was on the  
21 Zillow website, was it not?

22 A. Ah, I don't know if that house -- that house  
23 had a For Sale sign in the yard so I think that's how  
24 we called.

25 Q. Okay. I'm a little confused. I'm going to

1 try to clear this up. So you did not find the house --  
2 he did not find the house on Zillow dot com that he  
3 asked you to call a real estate agent about?

4 A. I might have found it and called for him  
5 because he was wanting to move closer to Pope.

6 Q. Right. Okay. What did he say he was going to  
7 do with the Crawford house? Did he say he was going  
8 to sell it?

9 A. No. He said you would live there.

10 Q. Okay. Did he say how he was going to finance  
11 the purchase of this house?

12 A. I guess he would pay for it.

13 Q. With what funds?

14 A. With his money.

15 Q. Okay. Did he give any specific ideas about  
16 where the money would come from?

17 A. No.

18 Q. He did not? Okay. Did he say that -- did he  
19 mention, by chance, that he would take the proceeds of  
20 the farmhouse sale and purchase this house?

21 A. No.

22 Q. He did not say that? So he was just going to  
23 pay cash -- he said he was going to pay cash for the  
24 house?

25 A. No.

1 Q. Did he give you any indication if he was going  
2 to go get a loan or write a check for it or anything  
3 like that?

4 A. No.

5 Q. He did not? Okay. When did you -- speaking  
6 of the farmhouse, when did you learn that or when did  
7 it become aware to you that we would be -- Senior and  
8 Junior would be getting a sales proceeds check from the  
9 sale of the farmhouse?

10 A. I guess when it closed.

11 Q. Okay. So you're stating that you knew at the  
12 time of the closure that Junior and Senior had gotten a  
13 check for the sale of the house?

14 A. Well, yes.

15 Q. Okay. Did you believe that that was Senior's  
16 money or Junior's money or both?

17 A. Both.

18 Q. Okay. Did Senior say what happened to that  
19 check?

20 A. No.

21 Q. Okay. Did he say that he -- he and I put it -  
22 - went to Regions Bank and put it into a joint bank  
23 account?

24 A. No.

25 Q. Okay. When did you learn that Senior had

1 given me Power of Attorney over his affairs?

2 A. Ah, when did I learn it?

3 Q. Yes. When did you become aware that I had  
4 Power of Attorney over his affairs and dealings?

5 A. Ah, probably in June of 2020.

6 Q. How did you learn of that?

7 A. Mr. Bob was going through his records and  
8 showed it to me.

9 Q. All right. Just a quick note. So he showed  
10 you the Power of Attorney?

11 A. Yes.

12 Q. Why did he show it to you?

13 A. He was looking for something in his files and  
14 we were going through it and I was trying to help him  
15 find it.

16 Q. Find -- what he was trying to find? What was  
17 he trying to find originally?

18 A. I don't recall.

19 Q. But you were helping him find whatever that  
20 was?

21 A. Yes.

22 Q. But you do not recall what he had asked you to  
23 help him find in his files?

24 A. Right.

25 Q. When you say files, could you --

1 A. Some of his paperwork that he had.

2 Q. Where was it? Was it just a folder or was it  
3 a big file cabinet?

4 A. I think it was just in a little accordion  
5 folder.

6 Q. Okay. And he couldn't find some kind of paper  
7 and he asked you to help him find that particular paper  
8 but it wasn't the Power of Attorney he was trying to  
9 find?

10 A. No.

11 Q. But you don't recall what it was that he had  
12 asked you to find?

13 A. No.

14 Q. Okay. And you're stating that when you went  
15 through this little accordion folder that he found the  
16 Power of Attorney?

17 A. I think so, yes.

18 Q. Okay. What did he do?

19 A. I mean, I don't know what he did. He didn't  
20 do anything.

21 Q. Well, you stated that he said, This is a Power  
22 of Attorney, and that's how you learned about it.

23 A. And he put it back in the folder.

24 Q. And that's all he said about the Power of  
25 Attorney is, This is a Power of Attorney, and just put

1 it back in the folder?

2 A. Yes.

3 Q. Did y'all ever find what you were originally  
4 trying to find?

5 A. I don't think so.

6 Q. Okay. What does a Power of Attorney mean to  
7 you? Does it -- are you aware of what a Power of  
8 Attorney does?

9 A. No, not really.

10 Q. All right. Did he state what it did?

11 A. No.

12 Q. Okay. Did Senior state why he gave me the  
13 Power of Attorney?

14 A. No.

15 Q. Do you think -- do you think it was a good  
16 thing that I had the Power of Attorney?

17 BY MR. ALFORD: Object to  
18 the form. You can answer.

19 BY MR. SULLIVANT: Can or  
20 can't?

21 BY MR. ALFORD: Yeah, she  
22 can answer it.

23 BY MR. SULLIVANT: Okay.

24 A. So, yes.

25 BY MR. ALFORD: She already



1 said she didn't know what a  
2 Power of Attorney is for.

3 BY MR. SULLIVANT: Okay.

4 Q. [Mr. Sullivant] Do you recall about when that  
5 was that you were going through -- helping him go  
6 through that accordion file of papers? Do you remember  
7 about when?

8 A. Maybe about April.

9 Q. About April. He was living at Crawford?

10 A. Right.

11 Q. All right. Were you aware that Senior went to  
12 Jay Westfaul's law office in Batesville to have the  
13 Power of Attorney revoked?

14 A. Yes.

15 Q. When did you find that out?

16 A. When I went with him.

17 Q. Okay. So you went with him to Jay Westfaul's  
18 office?

19 A. Yes.

20 Q. Do you have knowledge of how Senior decided  
21 upon Jay Westfaul to choose him to do this?

22 A. He just picked an attorney in Batesville.

23 Q. Okay. When -- and you went with him. You  
24 drove him from the Crawford house?

25 A. Yes, I think so.

1 Q. Okay. Do you remember --

2 A. No. It -- I think it -- yeah, it was in the  
3 Crawford house.

4 Q. So one day y'all drove to Batesville to Jay  
5 Westfaul's office to have the Power of Attorney  
6 revoked?

7 A. Right.

8 Q. And that's all y'all did that day --

9 A. Um-hmm. [indicating yes]

10 Q. -- as far as driving?

11 A. Um-hmm. [indicating yes]

12 Q. Just --

13 BY MR. ALFORD: 'Yes' or 'no'.

14 A. Yes.

15 Q. [Mr. Sullivant] Did he state why he was doing  
16 that?

17 A. No.

18 Q. He just -- did he just -- when you came over  
19 that day he said, We need to go to Jay Westfaul's  
20 office so I can have this Power of Attorney revoked?

21 A. I think he'd already made the appointment and  
22 I took him over there.

23 Q. Okay. Did he state why --

24 A. No.

25 Q. -- why he was doing it? Did you ask? Were

1 you curious about why would you want to go revoke your  
2 son -- Junior's Power of Attorney over you?

3 A. I didn't ask him.

4 Q. You didn't think about why, on the way over  
5 there, it didn't come up?

6 A. [Witness shakes head from side to side.]

7 Q. Were you not curious?

8 A. I mean, that's his business. No, I mean, I  
9 just do what Mr. Bob asks me to do.

10 Q. Okay. All right. About that time or did you  
11 go -- were you aware that Senior withdrew \$230,000.00  
12 out of a joint account owned by Senior and Junior?

13 A. No.

14 Q. You were not aware of that?

15 A. No.

16 Q. To this day you are not aware of that?

17 A. Yes.

18 Q. Okay. When did you find out about that?

19 A. About three days later when I went in Mr.  
20 Bob's to clean, he told -- went up to his house to  
21 work, he told me.

22 Q. Okay. What did he say?

23 A. He said that he had, ah, closed a bank account  
24 out.

25 Q. Did -- what did he say he did with the money?

1 A. Put it in a account.

2 Q. Okay. Did he say what type of account the  
3 money was in originally? Was it in a joint -- did he  
4 say what account it came out of --

5 A. It came out of a joint account.

6 Q. Did he state it was owned by Senior and  
7 Junior?

8 A. Yes.

9 Q. Okay. And he just stated he put it into a  
10 different account?

11 A. Right. Yes.

12 Q. Did he say why?

13 A. Ah, no.

14 Q. He just announced -- so he just announced  
15 that, A couple of days ago I went up to the Regions in  
16 Batesville and took \$230,000.00 out of a joint account  
17 owned by Senior and Junior and put it into an account  
18 only owned by Senior, and that's what he said?

19 A. Yes.

20 Q. He didn't elaborate? He didn't say why?

21 A. No.

22 Q. What did you do? I mean, did you ask why?  
23 Did that start a conversation?

24 A. Yeah, I asked him why.

25 Q. What did he say?

1 A. I think he wanted to buy a house.

2 Q. Oh, okay. So he wanted to use that money to  
3 buy the house. What did you say in reply?

4 A. I didn't say anything.

5 Q. The conversation just ended?

6 A. [Witness nods head up and down.]

7 Q. Okay. So, just to get this straight, he  
8 stated he was going to use those funds to buy a house  
9 and you didn't say anything? The conversation just  
10 ended?

11 A. Yes.

12 Q. Okay. Did he mention it ever again? In the  
13 next few days did he ever mention the money that he had  
14 put into that account?

15 A. No.

16 Q. Did he mention anything else about buying a  
17 house since he had some money to buy a house?

18 A. Yeah, and then he changed his mind.

19 Q. Could you elaborate?

20 A. He knew that he probably wouldn't be able to  
21 live by himself so he went into assisted living.

22 Q. Okay. That's a big jump so let's back up.

23 Okay. So he stated that he had taken the \$230,000.00  
24 out of the joint account owned by Senior and Junior,  
25 put it in an account just in Senior's name, stated that

1 he was going to buy a house with it and then he told  
2 you he had changed his mind and was going to move into  
3 assisted living?

4 A. Yes.

5 Q. Was that part of a bigger conversation?

6 A. He just said that he didn't think he would be  
7 able to live by himself.

8 Q. Did you have any comments? Did you have any  
9 ideas or did you add to -- reply to that conversation?

10 A. Yes.

11 Q. What did you say?

12 A. I said he could go back to live at Crawford  
13 Circle in the house.

14 Q. So he wasn't -- when this conversation  
15 happened, he wasn't -- he didn't live at Crawford  
16 Circle?

17 A. Yes. He was still there.

18 Q. Okay. So -- but he's still living there. So  
19 you told him to just stay at Crawford Circle?

20 A. [Witness nods head up and down.]

21 Q. Could you state that, please?

22 A. Yes.

23 Q. You're just --

24 A. Yes.

25 Q. Okay. What did he say in reply because you'd

1 stated before that he wanted -- he didn't want to stay  
2 there, he wanted to be closer to Pope. What did he say  
3 in return?

4 A. He didn't want to live at Crawford Circle. He  
5 would just go into assisted living.

6 Q. Okay. Did he state that that did not meet his  
7 earlier criteria of being closer to Pope?

8 A. [Witness nods head up and down.]

9 Q. Could you answer?

10 A. Yes.

11 Q. So he did state that?

12 A. I don't understand the question.

13 Q. Previously you had stated that Senior wanted  
14 to move from Crawford Circle and be closer to Pope.

15 A. Yes.

16 Q. That's why he was trying to find a house. You  
17 had stated that.

18 A. [Witness nods head up and down.]

19 Q. Now you're stating that he no longer wants to  
20 move closer to Pope, he wants to move into an assisted  
21 living facility.

22 A. Because he knew that he would be by himself  
23 and he really couldn't take care of himself. He didn't  
24 want to really be by himself because he couldn't take  
25 care of himself. He needed -- excuse me -- he needed

1 someone to be there so he thought it would be better to  
2 go to assisted living.

3 Q. Did he state where he might -- did he have any  
4 assisted living facilities in mind?

5 A. The Elison.

6 Q. This conversation was taking place at the  
7 Crawford house?

8 A. Yes.

9 Q. Okay. Did he state when he was going to move  
10 to the assisted living facility, --

11 A. No.

12 Q. -- the Elison?

13 A. No.

14 Q. Did he state any specific plans that he had?

15 A. No.

16 Q. He did not. Did you not ask him? After he  
17 stated he was going to move into an assisted living  
18 facility did you not follow up with some questions or  
19 with a conversation?

20 A. Which one?

21 Q. That he was going --

22 A. I mean, I asked him which one --

23 Q. All right.

24 A. -- he was going to.

25 Q. Okay. And what -- and then he -- what did he



1 reply?

2 A. He had checked on a few and he was going to go  
3 to the Elison.

4 Q. Okay. So he stated that he had checked on a  
5 few--

6 A. Um-hmm. [indicating yes]

7 Q. -- and decided on the Elison?

8 A. [Witness nods head up and down.]

9 Q. Okay. But he did not state when he was going  
10 to do that?

11 A. No.

12 Q. Did you ask him if you were still going to be  
13 employed past the time he would move into the assisted  
14 living facility?

15 A. No.

16 Q. You did not ask him that? But you're still  
17 under the --

18 A. But -- yes. He wanted me to -- I didn't ask  
19 him that but he did want me to come up there and, like,  
20 I still take him to the doctor and stuff like that.

21 Q. Okay. When -- when was the last time you  
22 worked for me where you reported to me and I paid you  
23 and decided your hours or what dates to work?

24 A. Probably, ah, maybe June of, ah, 2021, or  
25 April. Somewhere. May, April, May of 2021.

1 Q. April, May or June?

2 A. Yeah. Something like that.

3 Q. Okay. Describe how that happened. You just  
4 no longer worked for me. Did you just not show up or  
5 did I say, You're fired, or what did I say?

6 A. You didn't say anything. Mr. Bob, I think,  
7 left.

8 Q. Okay.

9 BY MR. SULLIVANT: I have -- I  
10 would like to enter an exhibit and  
11 maybe clarify some of this if Mr.  
12 Alford doesn't object or wants to  
13 look at it.

14 Q. [Mr. Sullivant] These are text messages dated  
15 from March 11th, 21st to the present from me and --  
16 between you and I. Between Evelyn -- between Mrs.  
17 Stevens and Junior.

18 BY MR. SULLIVANT: I would  
19 like to enter these as an exhibit  
20 to the deposition and have Mrs.  
21 Stevens look at them.

22 BY MR. ALFORD: I mean, I  
23 think it's probably something that  
24 was never produced to me in  
25 discovery but I don't really care.

1 BY MR. SULLIVANT: I --  
2 anyway.

3  
4 [The text messages were marked as  
5 Exhibit 1 to the deposition of  
6 Mary H. "Evelyn" Stevens.]

7  
8 BY MR. SULLIVANT: In response  
9 to Mr. Alford's statement that this  
10 was not presented in discovery, I  
11 will state this is for the purposes  
12 of this deposition because we're  
13 having some understanding of dates  
14 which I think to help clarify the -  
15 - the dates that I am trying to ask  
16 about so we can have some -- some  
17 factual information to refer to, to  
18 help.

19 Q. [Mr. Sullivant] If you could look at maybe  
20 around June 16th, these text messages.

21  
22 [Pause in proceedings.]

23  
24 A. Okay.

25 Q. Okay. You had -- is -- on June 16th did you

1 send me a text message saying 10:30 to 1:30?

2 A. Right.

3 Q. Okay. Is there any other -- and what was  
4 that? What is that, that you texted to Junior?

5 A. Well, you'd sent me, Send me your hours from  
6 yesterday and I will pay out of my account.

7 Q. All right.

8 A. And that was my hours, 10:30 to 1:30.

9 Q. Okay. Good enough. So those are your hours.  
10 What did I reply back with?

11 A. Yes.

12 Q. Not 3 hours?

13 A. Yeah. 3 hours.

14 Q. And then what did you reply?

15 A. Yes.

16 Q. Okay. Is there any other text after that  
17 submitting any hours to me?

18 A. No.

19 Q. Okay. Would you think that June 16th might  
20 have been the last day you worked -- reported to me?

21 A. Yes.

22 Q. So, to get back to the line of questioning,  
23 you were stating when you started to work directly for  
24 Senior. When would that have been in reference to the  
25 June 16th day that you stopped working for me?

1 A. Probably around the 4th or 5th of July.

2 Q. So you did not work for Senior between the --  
3 June 16th and, say, around July 4th?

4 A. Right.

5 Q. Okay. Did you call him or did he call you or  
6 what was the arrangement?

7 A. Oh, I just called -- I would call and just  
8 check on him. See how he was doing.

9 Q. Okay. So at this time he was at the Elife?

10 A. He was at the Elison.

11 Q. Elison. I'm sorry. The Elison. So you're  
12 stating that you just called him to check on him to see  
13 how he was doing?

14 A. Right.

15 Q. All right. What did he say?

16 A. He said he was okay.

17 Q. How did y'all get back into the employer/  
18 employee relation?

19 BY MR. ALFORD: Object to the  
20 form. You can answer if you can.

21 A. I would go check on him and take him to the  
22 doctor, take him to the grocery store.

23 Q. [Mr. Sullivant] Did Senior say, I still need  
24 your -- I still need you to drive me around on that  
25 phone call?

1 A. He -- yes. I went up there in person to see  
2 him after he moved in.

3 Q. Okay. And at that time he asked you, I still  
4 need to have you drive me around?

5 A. Yes.

6 Q. Okay. What did you say?

7 A. I said yes.

8 Q. All right. So, back to June 16th, on the last  
9 day that you worked for me, did -- you didn't say, Hey,  
10 I'm not going to work for you anymore or did I say what  
11 -- or did I -- did I end it or did you end it?

12 A. Well, uh, I just didn't -- I just didn't go  
13 back over there because I didn't think Mr. Bob was  
14 going to be over there anymore so you wouldn't need me.

15 Q. On June the 16th?

16 A. I guess that's the last time, yes.

17 Q. When did Senior move into the Elison?

18 A. I don't know exactly when he moved in. He had  
19 already moved in before I knew it.

20 Q. Okay.

21 A. He called me and told me he was living at the  
22 Elison.

23 Q. Okay. All right. So you did not speak to him  
24 between those dates?

25 A. Yes, I spoke to him but I never -- a couple of

1 times on the phone.

2 Q. Okay. So between June 16th and around  
3 July 4th you did talk to him?

4 A. Yes.

5 Q. Did you call him or did he call you?

6 A. He would call me and I would call him.

7 Q. Who called who first?

8 A. I called him to check on him or he would call.  
9 I can't remember who called each other first 'cause I  
10 always called to check on him.

11 Q. Okay. So if you're calling every so often,  
12 you would know about when he moved into the Elison.

13 A. I think he moved in the Elison around maybe  
14 the 1st or 2nd of July.

15 Q. Okay. All right. So the only contact -- I  
16 mean, you just called him a few times to check on him  
17 between the 16th and the -- July 4th?

18 A. Probably twice a week I would check on him.  
19 Two or three times a week I would call him.

20 Q. Okay. But back to the June 16th, and that  
21 being the last day that you gave me some hours, you --  
22 you didn't ask me, Am I still going to work for you,  
23 or, What's the deal? You weren't wondering about  
24 that?

25 A. No.

1 Q. As you -- but you did the times before when he  
2 moved from Crawford to Pope, you asked, correct?

3 A. Right.

4 Q. And then when he moved from Pope back to  
5 Crawford you asked me will you still be working.

6 A. Yes.

7 Q. But you didn't this time?

8 A. No.

9 Q. And any reason why?

10 A. Because you wouldn't need me anymore. He  
11 wouldn't be living there at Crawford.

12 Q. But he didn't move there 'til July 1st. He  
13 didn't move -- he didn't move to the Elison until  
14 June -- you stated he didn't move there until July 1st.

15 A. Right.

16 Q. All right. But -- about two weeks and you  
17 just wouldn't think he would need anything? But you  
18 did call him during those -- those -- that time period  
19 but you didn't call me to ask what the deal was?

20 A. No.

21 Q. Okay. All right. So from June 16th you never  
22 called me and didn't contact me?

23 A. Right.

24 Q. And just -- and just all of the sudden you  
25 just -- you had assumed that our employment relation



1 just ended?

2 A. Right.

3 Q. And you're stating that you weren't curious  
4 about that as you'd been the times before when things  
5 changed? You weren't curious if you were still going  
6 to be working?

7 A. Right.

8 Q. All right. All right. So when was the next  
9 time you actually worked for Senior?

10 A. I think he had been over at the Elison maybe  
11 two or three days before I went over there and saw him.

12 Q. Okay. Did you go inside the Elison?

13 A. Yes.

14 Q. Did you go into his room?

15 A. Yes.

16 Q. How long did you spend there that first day?

17 A. Maybe about an hour or so.

18 Q. Okay. Was this work or just to visit?

19 A. Visit, to help him set up his T.V., set up his  
20 computer.

21 Q. Okay. But you never came by the house to  
22 check on him during that time period, between June 16th  
23 and when he moved to the Elison?

24 A. Not that I recall.

25 Q. Okay. Why did you not come over to the house

1 to check on him? If you went over to the Elison to  
2 check on him, why didn't you come by the house to check  
3 on him?

4 A. I just called him on the phone.

5 Q. Okay. Then when you started the new  
6 employment reporting directly to Senior, describe your  
7 duties or job description from that point on.

8 A. I would go up there, take him to the doctor,  
9 take him to Wal-Mart, take him to his doctors' visits.

10 Q. How often a week?

11 A. Maybe twice.

12 Q. Twice a week. Did you go anywhere besides  
13 Wal-Mart or to a medical provider? Did you go anywhere  
14 -- did y'all just drive around or what else did you do?

15 A. He went and got his hair cut. He would have  
16 to go to Memphis Dermatology. I've taken him up there  
17 several times. I've taken him to, ah, well, I was  
18 going to take him to Tupelo and Wal-Mart, doctors'  
19 office, Walgreens, Lowe's, Home Depot, wherever he  
20 needed to go.

21 Q. Okay. You stated that was about twice a week  
22 he had somewhere to go?

23 A. Yeah. Sometime --

24 Q. About how long a duration would you work each  
25 time?

1 A. Maybe two hours.

2 Q. Two hours? What was -- so about how many  
3 total hours a week did you work for him?

4 A. Well, I worked for about -- about five or six.

5 Q. Total for a week?

6 A. Yes.

7 Q. All right. Did he pay you by the hour?

8 A. He didn't pay me.

9 Q. Okay. So, then, do you consider if you  
10 don't -- if you are not getting paid that you are doing  
11 work for somebody?

12 A. Yes, because I knew he was in a bind with his  
13 finances and I didn't know what the situation was, so I  
14 -- I did that because he's a friend of mine and I  
15 wanted him to be taken care of.

16 Q. So you are working pro bono, for free?

17 A. Well, no. He said when he got his finances  
18 together that he would pay me.

19 Q. When did that happen?

20 A. I don't think it's happened yet.

21 Q. So he doesn't pay you each time you work or  
22 each week like I did?

23 A. No.

24 Q. All right. Do you keep up with the hours?

25 A. Yes.

1 Q. So you have all the hours that you work for  
2 Senior recorded?

3 A. Well, I basically know about how much. I  
4 didn't record them all but I know -- I know how often I  
5 worked.

6 Q. All right. So on this employee/employer  
7 relation, when are you expected to get paid? When  
8 did -- has he said when he's going to pay you for all  
9 this back time?

10 A. He already did pay me.

11 Q. Oh, he did? So, how much did he pay you?

12 A. He give me his car.

13 Q. Okay. So he gave you your car. How much was  
14 the car worth?

15 A. I don't know. I didn't ask him.

16 Q. All right. So, the car being a Buick LeSabre?

17 A. Right.

18 Q. Did he sign the -- the title over to you?

19 A. Yes.

20 Q. All right. So that pays for all work done  
21 previously to that time?

22 A. Yes.

23 Q. Okay. When did he give you the Buick LeSabre?

24 A. He signed it over to me maybe a month or two  
25 ago.

1 Q. All right. Have you worked for him since  
2 then?

3 A. Yes.

4 Q. Has he paid you?

5 A. [Witness shakes head from side to side.]

6 Q. Could you answer that question out loud?

7 A. No, I'm sorry. No.

8 Q. All right. So he hasn't paid you but you're  
9 still doing work. Are you expecting to get paid?

10 A. No.

11 Q. So you're working for free?

12 A. Yes.

13 Q. Okay. All right. So just to clarify, you are  
14 now working for free, going to the Elison twice a week,  
15 five hours a time?

16 A. Not necessarily five hours at a time. I mean,  
17 sometime two, sometime one, sometime four.

18 Q. Okay. Do you go inside and sit with him  
19 and --

20 A. Yes. Go inside. Sit with him. Make --  
21 usually take him to his doctors' appointments.

22 Q. Okay.

23 A. Take him to Wal-Mart and get his medicine,  
24 take him to get his groceries.

25 Q. Do any other driving?

1 A. Drive him to Pope to the -- to get his hair  
2 cut.

3 Q. Anywhere else y'all drive?

4 A. If he needs to go somewhere and asks me to  
5 take him there, I'll take him.

6 Q. For example?

7 A. For example, if he wanted to go to Lowe's in  
8 Batesville, I would take him there. If he wants to go  
9 to Coleman's in Senatobia, I would take him there.

10 Q. All right. So -- but it was always drive some  
11 -- some specific place to buy something, do some sort  
12 of service for some specific reason that there was a  
13 destination to go there?

14 A. Right.

15 Q. Okay. But y'all just didn't drive around  
16 sometimes?

17 A. Most of the time we didn't.

18 Q. Okay. So you just stated -- did you just  
19 state that you went to Wal-Mart and Lowe's, get the  
20 hair cut but you didn't mention anything about the joy  
21 riding or just driving around. Did you mention that?

22 A. When we came back from getting his hair cut  
23 sometime we would ride down to Chickasaw to see how the  
24 water was but that wasn't a joy ride, I don't think,  
25 'cause that was right there where he was getting his

1 hair cut.

2 Q. All right.

3 A. We usually don't go joy riding.

4 Q. All right. During this -- on any of these  
5 rides did you take him to Calvin Vick's house?

6 A. Yes.

7 Q. Oh, okay. So you -- how often did you take  
8 him to Calvin Vick's house?

9 A. I've taken him about three or four times.

10 Q. Why did you not mention that before when I was  
11 asking about where all you took -- took him to before?

12 A. I did answer --

13 BY MR. ALFORD: She's already  
14 testified about that.

15 A. I already answered that.

16 Q. [Mr. Sullivant] All right. But you answered  
17 to before. That was before when you were working for  
18 me or about that time, not recently.

19 A. I didn't --

20 BY MR. ALFORD: is that a  
21 question?

22 Q. [Mr. Sullivant] It was a -- it was a rebuttal  
23 to Mr. Alford's objection.

24 A. I don't understand that.

25 Q. All right. Well, good enough. We will move

1 on.

2 So you did drive him over to Calvin Vick's  
3 house--

4 A. Yes.

5 Q. -- from the Elison?

6 A. Ah, yes.

7 Q. Three or four times. Did -- what was the  
8 nature of the visit or trip to Calvin Vick's house?

9 A. Sometime when he got his hair cut he would  
10 just want to go over there and visit with Calvin.

11 Q. So the only time you went to Calvin Vick's  
12 house or took him to Calvin Vick's house was after you  
13 took him to get a hair cut?

14 BY MR. ALFORD: Object to the  
15 form.

16 Q. [Mr. Sullivant] Did you --

17 BY MR. ALFORD: You can answer  
18 it if you can.

19 A. What was the question again?

20 Q. [Mr. Sullivant] Did you ever take Senior to  
21 Calvin Vick's house without going to get his hair cut?

22 A. Ah, yes.

23 Q. Okay. What was the nature of those visits in  
24 that case of -- what was the nature of the visit when  
25 you did not just stop by from getting a hair cut?



1 A. Well, one time Mr. Bob had, ah, sold Calvin a  
2 side-by-side.

3 Q. Okay. So you took him over there to make that  
4 transaction?

5 A. I took him over there for a visit and he asked  
6 Calvin about the side-by-side. I didn't know we were  
7 going to make a transaction. We just went for a visit  
8 and him and Calvin started talking.

9 Q. So what did Senior -- did Senior offer the  
10 side-by-side to Calvin Vick?

11 A. Yes.

12 Q. Did Calvin Vick then negotiate or accept the  
13 offer?

14 A. Yes.

15 Q. Do you recall how much it was for?

16 A. No.

17 Q. Did they transact any cash at the time?

18 A. No.

19 Q. Okay.

20 A. He wrote him a check.

21 Q. Okay. So you're stating that Calvin Vick  
22 wrote Senior a check for the side-by-side?

23 A. Yes.

24 Q. Okay. But you don't know how much that check  
25 was for?

1 A. No.

2 Q. Did you ask?

3 A. No.

4 Q. You did not. Now, you said you went over  
5 there three or four times and not every time was  
6 because you were coming back to get his hair cut. What  
7 were some of the other times besides the time he sold  
8 the side-by-side?

9 A. Just to go over there and visit with him.

10 Q. So you're stating you drove him all the way  
11 from the Elison all the way to Calvin Vick's home just  
12 to visit with him?

13 A. Ah, I think I did that a couple of times.

14 Q. Okay. Previously, if we can go back in time a  
15 little bit to before Senior moved to Elison and you had  
16 taken him over to -- did you ever take him to Calvin  
17 Vick's house?

18 A. When he was living at Pope?

19 Q. No, when he was living at Crawford.

20 A. Yes.

21 Q. Okay. Did Senior ever discuss with Calvin  
22 Vick Senior staying at Calvin Vick's house? Meaning,  
23 live there.

24 A. No, not when I was present.

25 Q. Okay. Were you aware that Senior did live at

1 Calvin Vick's house for four or five days?

2 A. Yes.

3 Q. Okay. Do you recall when that was?

4 A. No. No, I don't. I think it was before he  
5 moved into the Elison.

6 Q. Okay. So it was before he moved into the  
7 Elison. Did you ever call him during that time period  
8 to check on him?

9 A. No.

10 Q. How did you find out that he stayed at Calvin  
11 Vick's house?

12 A. I think he called me and told me he was at  
13 Calvin's.

14 Q. Okay. So he called you and -- so he called  
15 you just to say, I'm at Calvin Vick's house?

16 A. Right.

17 Q. Okay. Have you ever told Senior that Junior,  
18 myself, hung out with the worst element of people in  
19 Oxford?

20 A. No.

21 Q. Did you ever tell Senior that I was putting  
22 him into a conservatorship so I could steal his money  
23 and blow it on my friends?

24 A. No.

25 Q. Okay. Have you ever said anything derogatory

1 or inflammatory about Junior to Senior?

2 A. No.

3 Q. Okay. So during this whole time period did  
4 Senior ever bring up Junior in conversation?

5 BY MR. ALFORD: Object to the  
6 form. What time period are we  
7 talking about?

8 BY MR. SULLIVANT: During the  
9 time period that Senior left the  
10 Crawford -- about the time that  
11 Senior moved from the Crawford  
12 home to Calvin's house and then  
13 to the Elison -- Calvin Vick's  
14 house and then to the Elison.

15 A. Repeat your question.

16 Q. [Mr. Sullivant] Did Senior ever bring up  
17 Junior in any conversations that you had with him  
18 during the time period from approximately June of 2021,  
19 to present?

20 A. Yes.

21 Q. What -- could you give us an example of the  
22 conversation that you would have had -- that you had  
23 with Senior about Junior?

24 BY MR. ALFORD: Object to the  
25 form. You can answer.

1 A. He, ah, -- he was mad because you took his  
2 money.

3 Q. [Mr. Sullivant] Okay. So that was the end of  
4 the conversation?

5 A. [Witness nods head up and down.]

6 BY MR. ALFORD: Answer 'yes'  
7 or 'no'.

8 A. Yes.

9 Q. [Mr. Sullivant] Did you have that  
10 conversation more than once?

11 A. Yes.

12 Q. What did you reply back when Senior acted or  
13 stated he was mad because Junior took his money?

14 A. I just tried to calm him down and that's it.

15 Q. Did you tell Senior that that money was  
16 jointly owned by Senior and Junior?

17 A. Yes.

18 Q. And what was his response?

19 A. Ah, well, at the time I think it was only  
20 owned by Mr. Bob because he had taken the account --  
21 the money out of the account.

22 Q. Okay. So did you not tell him that you took  
23 both of Senior and Junior's money from Junior and put  
24 it to where Junior couldn't get to it?

25 A. No.

1 Q. Did you make that clear to him?

2 A. No.

3 Q. Did you think that was an important part of  
4 his anger?

5 A. Yes.

6 Q. But you didn't mention, you didn't try to  
7 explain that to him?

8 A. No.

9 Q. Why did you -- if it was an important part of  
10 why he was angry, why did you not mention that?

11 A. Because it was in his name, too, and I just --  
12 I assumed that he knew what -- if he wanted to get  
13 angry, he could.

14 Q. So you believe it's a healthy thing just to  
15 get angry and not try to help him become not angry?

16 A. No.

17 Q. Okay. Then why did you not tell him that it  
18 was both of y'all's money that you took and put into  
19 your own account?

20 A. I'm sure he knew that.

21 Q. But you didn't state it?

22 A. No.

23 Q. Okay. Did you ever go on a trip -- did you  
24 ever go up to the Elison to see Senior and take a trip  
25 to First Security Bank in Batesville and then come

1 straight back and then you then leave the premises of  
2 the Elison?

3 A. Probably. Yes.

4 Q. Could you be more -- more specific about your  
5 answer, please?

6 A. Yes.

7 Q. So you did -- just to be clear, you did come  
8 to the Elison for the express purpose of driving Senior  
9 to First Security Bank in Batesville and driving him  
10 back to the Elison and then you leaving, you know, at  
11 that time and did not stay?

12 A. Yes.

13 Q. What was the purpose of that trip? You said  
14 there were many times. What would be the purpose of  
15 that trip?

16 A. Ah, I'd taken him over there sometime to, ah,  
17 check, ah, check his bank account and then one time he  
18 went over there and he put me on his account at First  
19 Security Bank with him.

20 Q. Okay. When was that? When did he put you on  
21 his account?

22 A. I can't remember.

23 Q. About what month? Was it cold outside? Warm  
24 outside?

25 A. Maybe six months ago.

1 Q. Maybe six months ago. So you've stated that  
2 sometimes you went over there, drove all the way to  
3 Batesville just to check his balances and then drove  
4 back and then you went home.

5 A. Unless he wanted to withdraw some money.

6 Q. Unless he wanted to withdraw some money. What  
7 -- did he give you any of that money?

8 A. No.

9 Q. No? All right. So since he has put you on  
10 his -- I'm sorry. Did he state why he wanted to put  
11 you on his bank account?

12 A. In case something happened to him, his health,  
13 he just wanted me to be able to get some money in case  
14 I needed to get the -- get medicine or something for  
15 him.

16 Q. Okay. And that's the only reason that he said  
17 he put you on his account?

18 A. And he wanted me on there.

19 Q. I don't understand that. Did he say why he  
20 wanted you on there?

21 A. No, and I didn't ask -- Yes. To take care --  
22 in case something was to happen to him.

23 Q. And then if something happened to him, what  
24 were you going to do?

25 A. I would go get his medicine or take him to the



1 hospital or whatever he needed.

2 Q. Okay. Have you withdrawn any money from that  
3 account?

4 A. No.

5 Q. Have you put any money into that account?

6 A. No.

7 Q. All right. Are there any other assets or bank  
8 accounts that he -- that Senior has put your name onto?

9 A. Yes.

10 Q. Okay. Could you state what those are?

11 A. Ah, there's, ah, account at First National  
12 Bank, two accounts.

13 Q. Where is First National Bank?

14 A. Oxford.

15 Q. Okay. What are the two accounts?

16 A. I think he has a money market and a savings  
17 account.

18 Q. At First National of Oxford and you're saying  
19 that your name is on both of those accounts?

20 A. Yes.

21 Q. All right. How did Senior find, to the best  
22 of your knowledge, how did Senior find Mr. Alford to  
23 represent him?

24 A. I think Jay Westfaul recommended him.

25 Q. Okay. Do you remember when that was or did --

1 so at that meeting that you're at at Jay Westfaul's  
2 house -- office, Jay Westfaul said Senior should hire  
3 Mr. Alford?

4 A. No. That's wrong. I'm sorry. He referred us  
5 to Josh Turner.

6 Q. Okay. Did Calvin Vick recommend an attorney?

7 A. Not that I know of.

8 Q. Okay. Did Senior say why he needed an  
9 attorney?

10 A. Ah, no.

11 Q. Were you not curious?

12 A. Oh, yes, he needed an attorney because I think  
13 the money had got taken out of the account.

14 Q. All right. Could you be a little bit more  
15 specific, please?

16 A. The money that was in the Regions Bank in  
17 Batesville had been taken out of the account and Mr.  
18 Bob found out about it.

19 Q. Okay. Which account are you referring to?  
20 Senior's individual account that he had moved the  
21 \$230,000.00 into?

22 A. Yes.

23 Q. Okay. So Senior thought he needed an attorney  
24 because of that?

25 A. Yes.

1 Q. All right. Did you not tell him that, you  
2 know, that was both Junior and Senior's money and that  
3 Junior took it back? Did you not explain to him like  
4 you -- that that had happened?

5 A. Well, no. He knew it happened. It wasn't in  
6 his account anymore.

7 Q. Okay. Did he say what happened to the money?

8 A. He said you checked it out.

9 Q. Okay. Was he -- what was his mood after that  
10 happened?

11 A. He seemed to be kinda hurt.

12 Q. Okay. Did he say -- did he explain why that  
13 hurt him?

14 A. Well, you know, no, he didn't explain.

15 Q. He didn't? But you did not tell him that that  
16 money had been both Junior and Senior's money --

17 BY MR. ALFORD: How many times  
18 are we going ask that question and  
19 answer that question?

20 BY MR. SULLIVANT: A few more  
21 times.

22 BY MR. ALFORD: She can answer  
23 one more time but I think we've  
24 all heard the answer on that.

25 BY MR. SULLIVANT: Okay. But

1 if you don't mind I would like for  
2 her to answer one more time.

3 BY MR. ALFORD: All right.

4 A. No, because he knew it was in both y'all's  
5 names.

6 Q. [Mr. Sullivant] Okay. But you didn't try to  
7 clarify that to him?

8 A. I didn't see any point.

9 Q. Okay. All right.

10 A. You okay back there?

11 Q. Did you arrange -- did you call Mr. Alford's  
12 office to make the first appointment with Mr. Alford?

13 A. I'm sure I did, yes.

14 Q. All right. I have here a handwritten note.  
15 This has already been an exhibit that I furnished  
16 during discovery. I have it here. Hang on one minute.

17

18 [Pause in proceedings.]

19

20 Here you go. This is a handwritten note that  
21 I furnished during the discovery process and has been  
22 admitted into the process.

23 BY MR. SULLIVANT: I would  
24 like to put this as an exhibit  
25 into this deposition so that

1 Mrs. Stevens can refer to it.

2

3 [The handwritten note was marked as  
4 Exhibit 2 to the deposition of  
5 Mary H. "Evelyn" Stevens.]

6

7 BY MR. SULLIVANT: I was just  
8 going to propose maybe we take a  
9 little break. We've probably been  
10 at this an hour and a half. If  
11 anybody -- would y'all like to  
12 take a water break?

13 A. I would like to go to the restroom.

14 BY MR. SULLIVANT: All right.  
15 We will take a break for 10 or 15  
16 minutes if that's okay with  
17 everybody.

18 BY MR. ALFORD: Yeah.

19

20 [Discussion off record  
21 10:20 a.m. to 10:27 a.m.]

22

23 CONTINUING BY MR. SULLIVANT:

24 Q. The handwritten note that I have given you,  
25 does that look familiar to you?

1 A. Yes. That's my handwriting.

2 Q. Okay. Could you tell us what is on that  
3 handwriting piece of paper?

4 A. Swayze's address, his phone number.

5 Q. Okay. Any names mentioned on there?

6 A. Kayla.

7 Q. Any other names?

8 A. Hickman.

9 Q. Any other names?

10 A. Ah, Madison, but I think that's the street.

11 Q. Okay. Okay. Good enough. Could you -- since  
12 -- could you tell us what -- why you took those notes?

13 A. Ah, I guess so I would know where his office  
14 was at.

15 Q. Were you on the phone with him when you took  
16 these notes?

17 A. Uh, I don't know if I was on the phone or if I  
18 looked it up in the phonebook.

19 Q. But you did call the office and make an  
20 appointment?

21 A. Yes.

22 Q. Okay. Is there an appointment time stated on  
23 that piece of paper?

24 A. There's two. There's a 2:30 and a 1:30.

25 Q. Why are there two?

1 A. I have no idea.

2 Q. Okay. Did you make an appointment for Senior  
3 at Mr. Alford's office?

4 A. Yes.

5 Q. Do you recall who you spoke to at the office?

6 A. i might've -- I think I spoke to Kayla. I  
7 think was maybe his secretary.

8 Q. What did you tell Kayla?

9 A. I told her a friend of mine would like to make  
10 an appointment to come in and see Mr. Alford.

11 Q. Okay. Did she not ask any questions about  
12 why?

13 A. I just told her it was a legal matter.

14 Q. And she said, Okay. We will make an  
15 appointment for you.

16 A. Right.

17 Q. Did you give her any specifics about the  
18 matter whatsoever?

19 A. Ah, I don't think I did.

20 Q. Okay. So what day did you make that  
21 appointment for?

22 A. Maybe last July.

23 Q. Could've been June 24th?

24 A. Could've been.

25 Q. Okay. Did you take Senior to that

1 appointment?

2 A. Yes.

3 Q. Okay. Did -- which attorney or who did you --  
4 did you and Senior see during that visit?

5 A. Mr. Alford.

6 Q. Were you present --

7 A. Yes.

8 Q. -- during the whole meeting?

9 A. Yes.

10 Q. Okay. What happened in that meeting?

11 A. Ah, Mr. Bob, ah, told Mr. Alford that, ah, he  
12 wanted him to represent him.

13 Q. For what matter?

14 A. For a case that some money had been taken out  
15 of a Regions bank account.

16 Q. Did Mr. Alford ask for any specifics?

17 A. Ah, yes.

18 Q. What specifics did he ask for?

19 A. He just wanted to know, ah, what kind of bank  
20 account and the names on it.

21 Q. Were you -- were you participating in this  
22 conversation?

23 A. I was sitting there listening. Mr. Bob was  
24 doing most of the talking.

25 Q. You didn't offer any information?



1 A. Well, if he asked me something I'm sure I did.

2 Q. Did you provide any information to Mr. Alford  
3 during that meeting?

4 A. Ah, yes.

5 Q. Do you remember what information you provided  
6 to Mr. Alford?

7 A. No.

8 Q. You are stating that you did provide  
9 information to Mr. Alford during that meeting?

10 A. If he asked me a question, I provided him  
11 information.

12 Q. You don't recall --

13 A. I don't remember what questions he asked me.

14 Q. All right. What was the conclusion at the end  
15 of that meeting?

16 BY MR. ALFORD: Don't answer  
17 the question. I don't know what  
18 you're getting into, Robert, but  
19 we are not going down this road.

20 BY MR. SULLIVANT: I would  
21 like to know -- I would like to  
22 have an answer to that question.

23 BY MR. ALFORD: Well,  
24 you're not getting an answer to  
25 it. Why do you want to know?

1 BY MR. SULLIVANT: That is  
2 for me -- this is -- this is  
3 the process of discovery.

4 BY MR. ALFORD: Okay.

5 BY MR. SULLIVANT: We are  
6 trying to decide --

7 BY MR. ALFORD: Don't  
8 answer his question. It was  
9 an attorney/client meeting.  
10 It's privileged and you don't  
11 get to find that --

12 BY MR. SULLIVANT: And  
13 she is not --

14 BY MR. ALFORD: --  
15 information out.

16 BY MR. SULLIVANT: --  
17 protected by --

18 BY MR. ALFORD: If you  
19 want to have that argument  
20 with the Judge, you can have  
21 that argument with the Judge.

22 BY MR. SULLIVANT: I will.  
23 Okay.

24 BY MR. ALFORD: Okay.  
25 That's fine.

1 BY MR. SULLIVANT: Good  
2 enough. I will state that Mrs.  
3 Stevens is not protected by  
4 client/attorney privilege --

5 BY MR. ALFORD: Okay.

6 BY MR. SULLIVANT: -- and I  
7 further assert that -- anyway, we  
8 will go into that later.

9 Q. [Mr. Sullivan] In any conversations after  
10 that first meeting with Mr. Alford that you had with  
11 Senior, did Senior ever state what the goal of the  
12 lawsuit would be that he was trying to get?

13 A. Yes.

14 Q. What did he say?

15 A. To get his money back.

16 Q. To get his money back. To the best of your  
17 knowledge, has Senior gotten his money back?

18 A. To the best of my knowledge, yes.

19 Q. Okay. Did Senior ever say to you that he  
20 wished to move back to the Crawford house after the  
21 lawsuit was settled and I moved -- or Mr. -- let me  
22 leave it right there. After the lawsuit was settled?

23 A. Ah, yes.

24 Q. When did he state that?

25 A. He stated it several times.

1 Q. Okay. Not really meaning how many times but  
2 when did he first -- when do you recall him first  
3 stating that he wanted to move back to the Crawford  
4 house?

5 A. Maybe six months ago.

6 Q. Did he state why he had a change of heart and  
7 he wanted to move to the Crawford house?

8 A. Ah, well, the only reason he wanted to move to  
9 the Crawford house is he does not really care for the  
10 Elison.

11 Q. Okay. But you stated earlier that he stated  
12 that he could not take care of himself by himself.  
13 What was -- did he state what his plans were at the  
14 Crawford house to take care of himself?

15 A. He did not state.

16 Q. Did you inquire because -- did you inquire why  
17 he had a change of heart?

18 A. He just didn't like it there.

19 Q. Okay. Did you inquire of him how he was going  
20 to take care of himself?

21 A. Ah, yes.

22 Q. Okay. What did he say?

23 A. He said his niece might be moving back in with  
24 him.

25 Q. His niece might be moving back?

1 A. His niece may be moving back. His niece --  
2 his niece may be moving here.

3 Q. Did he specify a niece?

4 A. Carolyn.

5 Q. To the best of your knowledge was Senior  
6 thinking that Carolyn -- Caroline was going to move --  
7 Caroline and her last name is Carolyn Nicholas, when  
8 she was going to move back?

9 A. He said when he thinks that her mother, Jane,  
10 may pass away.

11 Q. Good enough. How many times have you taken  
12 Senior to Mr. Alford's office?

13 A. Probably about eight.

14 Q. Do you have any knowledge of Senior going to  
15 Mr. Alford's office without you?

16 A. Ah, I think he might have one time.

17 Q. Okay. Did Senior ever tell you during these  
18 trips back and forth to Mr. Alford's office why he met  
19 with Mr. Alford on June 24th but didn't file a lawsuit  
20 until October 25th?

21 A. He didn't tell me.

22 Q. Okay. During all of these trips back and  
23 forth to Mr. Alford's office, do you have any knowledge  
24 that Senior has written a new Will?

25 A. Not to my knowledge, no.

1 Q. Okay. Were you aware, did Senior ever state  
2 to you that he had written a Will some years back and I  
3 was the single heir?

4 A. No.

5 Q. Okay.

6 BY MR. SULLIVANT: I would  
7 like to introduce as an exhibit a  
8 sales vehicle invoice for a 2020  
9 Ford Ranger pick up truck. Any  
10 objections?

11 BY MR. ALFORD: You can  
12 attach whatever exhibit you want  
13 to to the deposition, Robert.

14  
15 [The Vehicle Invoice was marked as  
16 Exhibit 3 to the deposition of Mary  
17 H. "Evelyn" Stevens.]

18  
19 Q. [Mr. Sullivant] I think we are getting close  
20 to the end of my questions anyway.

21 Before you appears a Vehicle Invoice for a  
22 Ford truck. It is both -- it is showing ownership in  
23 both Senior's name and in your name. Why did you  
24 decide to buy a pick up truck?

25 A. I didn't decide to buy a pick up truck.

1 Q. Okay. Whose decision was it?

2 A. Mr. Bob's.

3 Q. But you did sign the sales invoice as buying  
4 it.

5 A. Yes.

6 Q. Okay. So at some point you did agree to buy a  
7 pick up truck.

8 A. He agreed to buy a pick up truck. He wanted  
9 my name on the title.

10 Q. So if you did not agree to it, why did you put  
11 your name on the title?

12 A. Well, I did agree to it after we were in  
13 there.

14 Q. Okay. So then you agreed to it later is what  
15 you are saying. Did Senior say why he wanted your name  
16 on the pick up -- on the pick up truck title?

17 A. He said he just wanted my name on the title in  
18 case something happened to him.

19 Q. Okay. It's a little hard to read but was  
20 there a loan for this truck?

21 A. No.

22 Q. Okay. Was there a trade-in?

23 A. No.

24 Q. All right. How much cash did you put in on  
25 this purchase?

1 A. None.

2 Q. All right. Senior did have a Buick LeSabre  
3 and is this the time that he gave it to you?

4 A. No, he still had it.

5 Q. Okay. What happened to the Buick LeSabre, to  
6 the best of your knowledge, after the purchase of this  
7 truck?

8 A. He was still -- he had both of them.

9 Q. All right. Did he say why he didn't trade in  
10 the Buick LeSabre?

11 A. No, he didn't. He didn't.

12 Q. He didn't say, Well, why not trade in the  
13 Buick LeSabre?

14 A. He said he wanted to keep it.

15 Q. He didn't tell you any plans he had for it?

16 A. Yes. He told me he wanted to give me the car  
17 because I hadn't been paid anything since I'd been  
18 working for him.

19 Q. Okay. Any idea how many miles are on the  
20 truck now?

21 A. I think about 30,000.

22 Q. How many of those miles did you put on the  
23 truck?

24 A. I've probably put about 2,000.

25 Q. Where does -- to the best of your knowledge,



1 where does the truck -- where is it parked at night?

2 A. At the Elison.

3 Q. Do you ever keep the truck?

4 A. Yes.

5 Q. What do you use the truck for?

6 A. I use it to, ah, haul my stuff -- haul some  
7 stuff.

8 Q. All right. Oddball question here but when you  
9 were helping -- when you were helping clean out the  
10 farmhouse before we sold it, you were helping us clean  
11 out the house, correct?

12 A. Right.

13 Q. Okay. Did you happen to see a Lionel train  
14 set box in the upstairs?

15 A. No.

16 Q. You never did? Okay. Good enough. Since  
17 this lawsuit has been filed and since Senior has moved  
18 out of the house on Crawford, have you ever told Senior  
19 that he should try to talk to his son and work things  
20 out before it's too late?

21 A. Yes.

22 Q. Could you be more specific? What did you say?

23 A. I just said may -- I wish y'all could work  
24 stuff out.

25 Q. Okay. What did he say in reply?

1 A. No.

2 Q. Did he give a reason?

3 A. That's not happening.

4 Q. Did he give anymore reason? Was that the end  
5 of the conversation?

6 A. Yes.

7 Q. Did you have it more than once?

8 A. Yes.

9 Q. Did you state that he should, though?

10 A. If there was any way possible, yes. I think  
11 all parents and children need to have a relationship.

12 Q. Okay. Very good. I noted when I attempted to  
13 text you about this deposition that it appeared that my  
14 texts were blocked. Did you block me from your phone?

15 A. Yes.

16 Q. Why did you block me from your phone?

17 A. I just blocked it because I didn't want you  
18 calling me.

19 Q. Why would you not want me to call you?

20 A. I hadn't heard from you in a year and a half,  
21 why would you call me now?

22 Q. Is that a reason to block somebody?

23 A. It is for me.

24 Q. Do you block a lot of people?

25 A. No.

1 Q. No? During this time frame since the last  
2 time you worked for me, did you ever try to call me to  
3 say how things were going or have a question about --  
4 about -- since you were -- since you were taking care  
5 of Senior, surely you would have a question.

6 A. What kind of question?

7 Q. About some physician he was seeing before?  
8 Where is a good place to take him for this? You asking  
9 questions. Did you ever ask me any questions before  
10 June 16th about how to take care of Senior?

11 A. Not that I know of.

12 Q. Okay. So you never asked me anything about  
13 where to take him to see a doctor or --

14 A. I might've asked you who his dermatologist was  
15 or what doctors he used but I know pretty much about  
16 all the doctors he goes to.

17 Q. So you never attempted to call me or send me a  
18 text about anything?

19 A. After when?

20 Q. June 16th.

21 A. Not that --

22 Q. The last -- the last day that you worked for  
23 me directly.

24 A. I don't think so, no.

25 Q. Okay. So I also noticed that after -- when I

1 did call you on you landline to ask you if you had  
2 gotten the deposition notice, why -- and you had stated  
3 you didn't -- did you state you had gotten it or not?

4 A. I stated that I hadn't got it but I hadn't  
5 checked the mail from yesterday.

6 Q. Okay.

7 A. But I had not gotten it.

8 Q. What did you do after that? Did you -- did  
9 you go check?

10 A. Yes. I went to the mailbox.

11 Q. Okay. Did you mean to hang on to the phone to  
12 tell me if you had gotten it or not?

13 A. I did hang on to the phone.

14 Q. Okay. Did you hang up after that?

15 A. I had -- I don't have good cell service at my  
16 house and that was my cell phone and the phone call  
17 dropped.

18 Q. It wasn't your landline?

19 A. No.

20 Q. Okay. Did -- so you didn't call me back to  
21 tell me, Yes, I got it?

22 A. Ah, no.

23 Q. All right.

24 A. I didn't get it.

25 Q. You did not receive it by U. S. post service?

1 A. No. I didn't get it.

2 Q. All right. Good to know.

3 BY MR. SULLIVANT: That's all  
4 the questions I have.

5 BY MR. ALFORD: Well, I'm  
6 going to withdraw my earlier  
7 objection about the questions you  
8 asked about during the meeting with  
9 me and Evelyn and Mr. Robert, so  
10 whatever you want to ask her about  
11 it so we can get this over with.

12 BY MR. SULLIVANT: Okay.

13 Q. [Mr. Sullivant] At the meeting -- the first  
14 meeting with Mr. Alford that you were a party to, did  
15 Mr. -- did you provide Mr. Alford any information?

16 BY MR. ALFORD: I think you  
17 asked those questions.

18 BY MR. SULLIVANT: I did. I'm  
19 trying to get back to where I --  
20 I don't remember exactly where I  
21 was.

22 BY MR. ALFORD: All right.

23 A. Yes.

24 Q. [Mr. Sullivant] Okay. What was the  
25 conclusion -- what was decided at the conclusion of

1 that meeting?

2 A. That he would handle Mr. Bob's case.

3 Q. Did he give any instructions or directions or  
4 what to do next?

5 A. No. That he would be in touch.

6 Q. Okay. Did he state that you needed to get  
7 some bank information, --

8 A. No.

9 Q. -- that Senior should go get some bank  
10 information?

11 A. I think we had the information when we went  
12 in.

13 Q. Okay.

14 BY MR. SULLIVANT: I would  
15 like to make another exhibit to the  
16 deposition. This item has been  
17 provided to me through discovery  
18 from Senior and I have provided it  
19 back to Senior through discovery.

20  
21 [The bank information was marked as  
22 Exhibit 4 to the deposition of  
23 Mary H. "Evelyn" Stevens.]

24  
25 Q. [Mr. Sullivant] Is what I provided you the

1 bank information you stated you got before you went to  
2 the meeting with Mr. Alford?

3

4 [Pause in proceedings.]

5

6 A. Okay. What about it?

7 Q. Was that the bank information that you stated  
8 you had brought to the meeting?

9 A. No, I don't think that was it.

10 Q. Okay. Have you seen that before?

11 A. I don't think I have seen this before.

12 Q. Okay. Did you accompany Senior to the Regions  
13 branch on the Square after meeting with Mr. Alford? Do  
14 you recall that?

15 A. Yes, I do.

16 Q. Okay. Did you not get this information at  
17 that time? It's dated June 24th.

18 A. I mean, I possibly could. I can't see real  
19 well anyway but -- I could have. I mean, I just don't  
20 recall right now. Maybe I did.

21 Q. Okay. Do you know what this is? Does  
22 this --

23 A. It looks like a closing to the land, I mean,  
24 the house.

25 Q. Okay.

1           BY MR. SULLIVANT: I will end  
2 my questions there.

3

4

5 [Whereupon the deposition was  
6 concluded at 10:52 a.m.]

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1 CERTIFICATE OF COURT REPORTER

2 I, Teresa B. Henry, Certified Court Reporter  
3 for the State of Mississippi, hereby certify to the  
4 following:

5 That the foregoing 88 pages, and including  
6 this page, contain a full, true and correct transcript  
7 of the testimony of Mary H. "Evelyn" Stevens as taken  
8 by me at the time and place heretofore stated in the  
9 aforementioned matter and later reduced by me to  
10 typewritten form to the best of my skill and ability;

11 That the deponent was placed under oath to  
12 truthfully answer all questions in this matter under  
13 the authority vested in me by the State of Mississippi;  
14 and

15 That I am not in the employ of or related to  
16 any counsel or party in this matter and have no  
17 interest, monetary or otherwise, in the final outcome  
18 of this proceeding;

19 WITNESS MY SIGNATURE AND SEAL, this, the 17th  
20 day of November, 2022.

21 

22 TERESA B. HENRY, CSR 1205

23 ( S E A L )

24 My Commission Expires:

25 December 16, 2022

1 CERTIFICATE OF DEPONENT

2 I, Mary H. "Evelyn" Stevens, deponent in the  
3 deposition taken in the herein styled and numbered  
4 cause, certify that I have examined the foregoing 89  
5 pages, being the total number of pages relating to my  
6 testimony, as to the correctness thereof, and that  
7 after reading said pages, I find them to contain a  
8 full, true and correct transcript of the testimony as  
9 given by me in Oxford, Mississippi, on November 15,  
10 2022.

11 This, the day of ,  
12 2022.

13

14

MARY H. "EVELYN" STEVENS

15

STATE OF MISSISSIPPI

16

COUNTY OF

17

18 SWORN TO AND SUBSCRIBED before me, this, the  
19 day of , 2022.

20

21

22

NOTARY PUBLIC

23

( S E A L )

24

My Commission Expires:

25

25

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