

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

ROBERT SULLIVANT, SR.

PLAINTIFF

VS.

CAUSE NO.: 2021-612 (W)

ROBERT SULLIVANT, JR.

DEFENDANT

DEFENDANT, ROBERT SULLIVANT, JR'S RESPONSES
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS

COMES NOW, Defendant, Robert Sullivan, Jr., and files this, his RESPONSES TO PLAINTIFF, ROBERT SULLIVANT, SR.'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Please state the full name of the person answering these Interrogatories, the present resident address of said person, the period during which said person has resided at the address, and the age of the person answering these Interrogatories (giving month, day and year of birth.)

RESPONSE TO INTERROGATORY NO. 1: Robert Sullivan, Jr.

INTERROGATORY NO. 2: Please state your place of employment, and each and every place of employment, whether part-time or full-time for the past five (5) years, including in your answer the following:

- a. The name of your employer;
- b. The inclusive dates of employment;
- c. The number of hours worked per week;
- d. Wage or salary;

- e. Any fringe benefits you are entitled to by reason of your employment;
- f. The reason you left each place of employment; and
- g. The gross and net annual income for such employment.

RESPONSE TO INTERROGATORY NO. 2: Defendant has not been employed by anyone within the last five years. His last employment was an accounting consulting practice with Baylor, Scott & White, Healthcare, while in Austin, Texas. His hourly billing was between \$85 and \$125 per hour depending on the engagement. Defendant was billing 20 to 30 hours a week while in Austin, TX. After moving back to Pope, he could only bill 5 to 10 hours, and eventually had to resign from his Texas engagements. Defendant was offered full time CFO position and salary of \$125,000 per year with healthcare company in Memphis in 2017. Due to his duties to his parents, could only consult with them for 30 hours a week at a rate of \$75 per hour. He was being paid approximately \$125,000.00 a year at that time; however, eventually after moving he had to forgo all consulting and full time employment to live in Mississippi to care for his mother and later, his father. Defendant did have other consulting clients in 2016, but the his primary work was with Baylor, Scott & White, Healthcare.

Defendant was continually working toward getting his Father's health and behavior stabilized, so he could restart his professional career. In 2019, Defendant pursued a consulting practice with Vena Software (Toronto, CN), as this is the type of consulting he had successfully done nationally while living in South Florida. After considerable effort and expense to start consulting practice, Jr still had to monitor his Father's health, safety, and risky financial behavior daily, and decided he would not be able to do the required national travel required to do the work. Jr's daily goal was to stabilize Sr in regards to his well being, safety, health, and behavior, so Jr

could get back to his professional career that he had previously worked 25 years to build and lost to fulfill his promise and duty to his parents.

INTERROGATORY NO. 3: Please list the name, address and telephone number of any witnesses you will or may call to testify in this case and give a summary of the testimony that you propose to adduce from, or present by, said witnesses, including any exhibits to said testimony. [OBJECTION WILL BE MADE AT TRIAL TO THE CALLING OF ANY WITNESS(ES) NOT LISTED IN YOUR RESPONSE TO THIS INTERROGATORY.]

RESPONSE TO INTERROGATORY NO. 3: Calvin Vick, 7611 Pope Water Valley Road, Batesville, MS; Evelyn Stevens, 217 CR 436, Tula, Mississippi; Shawn Harmon, c/o Regions Bank, 290 Highway 6 West, Batesville, Mississippi; Carolyn Nicholas, 2207 Cooke, Wichita Falls, Texas; and Katherine D. Bishop, 151 Public Square, Batesville MS 38606.

INTERROGATORY NO. 4: With respect to all witnesses whom you will or may call as experts to give opinion testimony at the trial of this matter, please state the name, address, and telephone number of his employer or the organization with which he is associated in any professional capacity; the field in which he is to be offered as an expert; and a summary of his qualifications in the field in which he is expected to testify; the substance of the fact to which he is expected to testify; the substance of opinion to which he is expected to testify and a summary of the grounds of each opinion, the dates of all reports rendered by such experts, for whom prepared, and in whose custody at present.

RESPONSE TO INTERROGATORY NO. 4: At this time, the Defendant does not contemplate calling any expert witnesses. This Interrogatory Response will be supplemented should this position change.

INTERROGATORY NO. 5: Please list and itemize the sources and amounts of all income that you are presently receiving from any source including, but not limited to, any salaries, dividends, rentals, commissions, interest, investment, trust or trust funds (including those listed in the name of your child or anyone else), or any other type of compensation or income, of whatsoever kind or nature, itemizing the amount of income from each such source.

RESPONSE TO INTERROGATORY NO. 5: Defendant objects to this Interrogatory as it neither seeks nor is it reasonably calculated to lead to admissible evidence. Without waiving this objection, Defendant has derived no income within the past five years other than very limited interest and dividend payments. He has had no significant income from a third-party source because he has been caring for his mother and his father.

INTERROGATORY NO. 6: If you plan to present any written reports or photographs at trial to substantiate any claims or allegations, please state the dates on which the reports were written and the photographs taken, listing the names, addresses and telephone numbers of the individuals who generated the written reports or photographs and the names, addresses and telephone numbers of the individuals who have custody of same at the present time.

RESPONSE TO INTERROGATORY NO. 6: Defendant plans and intends to produce and utilize at the trial of this matter, any of the documents included within Exhibit "A," amounting to Sullivant, Jr. 000001 - 000211.

INTERROGATORY NO. 7: In your Counter-Claim you contend that you and the Plaintiff shared a joint account at Regions. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;

- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 7: There was a joint account at Regions that was first the account of Sullivant, Jr. and his wife, Jr.'s mother, Willola. Sullivant, Jr. was added to that account likely sometime in 2016. That account was referred to by the three parties as the "condo account" and it was an account at Regions bank ending in account number 8739. Defendant will rely upon documents contained inside Exhibit "A" and his own testimony, as well as the testimony of Plaintiff.

INTERROGATORY NO. 8: In your Counter-Claim you contend you contend that you and the Plaintiff jointly owned the "farm house" in Panola County. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 8: Please see the Deed, Closing Statement and check, as well as the Order Closing the Estate of Willola Vick, all enclosed within Exhibit "A" and the other papers in Exhibit "A." Defendant will rely upon these records, as well as his own testimony and the testimony of his father.

INTERROGATORY NO. 9: In paragraph 9 of your Counter-Claim you contend that the

Plaintiff was responsible for a list of specific "risky and substantial behavior". Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 9:

The behavior of Plaintiff includes the following: (1) moving to the vacant farm house to live alone because Defendant was intercepting the scam mail that was coming to him and his outgoing checks in response to those scams; (2) not telling Defendant that he was moving and forcing Defendant to call the Sheriff's department that evening; (3) allowing his auto insurance to lapse while he was living at the farm house (4) not acquiring auto insurance after closing bank the Regions checking account from which it was drafted requiring Defendant to start paying it from Defendant's bank account so he would have auto insurance (5) not filing income tax for 2020 and failing to arrange with Defendant to do that for him; (6) closing Regions individual account without taking care of auto pays, and causing a \$900 overdraft and losing access to the transaction without a backup and failing to consult with Defendant regarding this decision; (7) closing the "condo account" at Regions, a joint account, and losing all the transactions without a backup, without consulting with Defendant; (8) continuing to drive despite the danger that presented to him and others; (9) sending significant monthly amounts in response to scam solicitations and other solicitations; (10) nearly funding a scam request for payment in the amount of \$3,000 requested over the telephone by

someone in Jamaica ; (11) Giving out credit card info and other personal info to strangers on the phone; (12) not protecting his computer and online bank account with adequate passwords; (13) not paying his mortgage since May of 2021; (14) making plans to buy a second house in the same area while owning another house with a mortgage on it; (15) moving Defendant's funds to his own account, and planning to use it to buy house, because he thought it was his money; (16) trusting his housekeeper to advise him on legal matters; (17) trusting his nephew to advise him on legal matters (18) driving to farm house to cut grass for up to five hours a day by himself in heat of the day, in the heat of summer and refusing to drink water while working ; (19) attempting to drive to farm house by himself to move a 3 drawer filing cabinet downstairs, out to his car, into his car trunk, and then to move it upstairs at Crawford house; (20) giving farm equipment away to his nephew Calvin Vick, despite the joint ownership of that farm equipment; (21) giving his nephew Calvin Vick the family history papers for his wife Willola's side of the family without conferring with Defendant; (22) giving hunting rights on land owned jointly with Defendant to strangers without conferring with Defendant first; (23) failing to make his required 401(k) withdrawal for 2021; (24) having timber cut without consent of my mother and without nor getting more then one bid resulting in a decreased value of property by within \$100,000 \$200,000 just so he could buy a toy tractor and UTV; (25) running up his Citibank credit card, and not paying down balance, to fund his mail scammers obsession; (26) failing to pay that Citibank card payment timely, incurring unnecessary penalties, and interest and ruining his credit; (27) attempting to string up phone line to the shop at the farm house by standing on the raised fork lift arms; (28) revoking POA in response to Defendant interfering with his check writing compulsion and on the false assumption that the \$230,000 was his alone; (29) failing to provide and notice to Defendant of the revocation of the POA; (30) filing

lawsuit against his son for trying to protect his assets from people trying to take advantage of him; (31) telling his attorney that the \$230,000 was solely his, and that the joint account was not a joint account; (32) accusing movers of stealing his checkbooks without an basis; (33) burning up clutch on a tractor, because he has lost his ability to use properly, and blaming a worker who never touched the tractor; (34) changing his place of residence between the farm house, the Oxford house and Elmcroft, multiple times for no good reason; (35) ransacking Defendant's bedroom dresser without Defendant's permission when Plaintiff believed Defendant was not at home; (36) moving a Lincoln engine drive welder, worth \$1,000, that belonged to Defendant out in the woods; and (37) giving away the Lionel train set that belonged to the Defendant while moving out of the farm house. All of this has dramatically impacted Defendant's quality of life to the point where he now takes prescribed anti-depressants.

INTERROGATORY NO. 10: In paragraphs 12, 14, and 16 of your Counter-Claim you contend that you paid certain expenses for the benefit of the Plaintiff. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 10 : Before the Power of Attorney was revoked, Jr. paid all of Sr.'s bills, other than his fee for garbage removal. That fee could not be paid online and Sr. paid that monthly with a check. All of Sr.'s other expenses, including his mortgage,

utilities, health insurance, car insurance, credit cards storage fees, and any other expense, were paid by Jr., either manually or through auto drafts set up by Jr., prior to the revocation of the Power of Attorney. Jr. will rely on his testimony and the testimony of his father to support this contention.

INTERROGATORY NO. 11: In paragraph 19, including sub-parts a-g, of your Counter-Claim you contend that you took certain actions for the benefit of the Plaintiff. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
- and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 11 : Defendant makes reference to the description in Response to Interrogatory No. 10 above. In addition to paying all of Sr.'s bills, Jr. made sure that Sr. made it to all of his doctor's visits and helped Sr. with decision making regarding his medical care. Defendant purchased about 75% of all of the groceries and daily necessary items for his father, handled all of the cooking and some of the cleaning when they lived together in the farm house and in the Oxford house and also, at Sr.'s direction, handled Sr.'s income taxes. Anything that Sullivant, Sr. needed done, Sullivant, Jr. did for him. Jr. also insured the Sr. did not engage in risky physical activities and Sr. was prone to doing that. Jr. provided all maintenance on the tractors and lawnmowers. Jr. provided maintenance on two homes including the roof, security doors and Sr.'s health and safety alarm. Jr. remodeled the condo and the Crawford house. Jr. called credit card companies to avoid scam charges, and when necessary replaced scam infested credit

cards. For two years, Jr. managed the care and provided intensive and complex healthcare for Willola Sullivant and handled the subsequent funeral and estate. Jr. handled all estate sales, including surveys, contracts, negotiating prices and handling closings. The witnesses that will support this contention are: Defendant, Plaintiff, and Evelyn Stevens.

INTERROGATORY NO. 12: In paragraph 20 of your Counter-Claim you contend that the Plaintiff "has been engaging in a pattern of erratic and irregular spending over the past 4 years."

Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 12 : Defendant makes reference to the documentation contained in collective Exhibit "A," Sullivan, Jr. 000001 - 000211. The erratic and irregular spending over the past four years includes erratic check writing, erratic decisions regarding housing, erratic decisions regarding closing accounts, and the unsubstantiated belief that he owned all of the proceeds from the sale of the farm house.

INTERROGATORY NO. 13: In paragraphs 23 -27 of your Counter-Claim you contend that you should be appointed as co-conservator for the Plaintiff. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;

- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 13: Defendant is attempting to find employment and has a higher likelihood of finding employment outside of Oxford rather than inside of Oxford. Defendant believes that so long as he is in the local area, he is the best person to serve as a Conservator, but would agree to an Independent Conservator in the event that he finds work outside the local area. Defendant does believe he will be able to supply information to the Independent Conservator, should one be appointed, because of his knowledge of his father and his knowledge of his father's finances.

INTERROGATORY NO. 14: In paragraph 30 of your Counter-Claim you contend that the Plaintiff has taken steps to the detriment of your inherited interests. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 14 : Defendant inherited one-half of his mother's interest in various pieces of real property and other assets. At the request of his father, he arranged for the sale of these properties and all of the proceeds from the sale of these properties went into his father's exclusive account at TD Ameritrade. This includes a sale of 15 acres, for

\$51,000.00; 1 acre for \$5,000.00; 4.5 acres for \$18,000.00. One-fourth of these funds belongs to Defendant, arising out of the Estate of his Mother, Willola Vick. Plaintiff should deliver these sums to Defendant.

Further, Plaintiff has disposed of two tractors, a Mahindra, with a back hoe and a front end loader, valued at \$40,000 and a New Holland tractor, valued at \$25,000, and other farm equipment, by giving them to Calvin Vick, without consideration of any kind. Plaintiff also disposed of one bush hog, one disc, several plows, one tractor boom, one post hole auger, one 4 wheel ATV, one sprayer, other tractor implements and ladders and one dog kennel. Wilola Vick had an interest in that equipment and therefore, Defendant has a 25% interest in that equipment. It is further true that Plaintiff disposed of a old and valuable train set that belonged to Defendant, and Defendant alone. Defendant relies on the documents attached as Exhibit "A" amounting to Sullivant, Jr. 000001 - 000211 in support of this contention.

INTERROGATORY NO. 15: In paragraph 31 of your Counter-Claim you contend that the Plaintiff released, for no consideration, a list of specific items that belonged solely to you. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 15: Defendant disposed of the Lionel train set, the Lincoln welder that he moved into the woods and ruined, and the cart that the welder was

on. He gave that cart away to Calvin Vick. As described in Response to Interrogatory No. 14 above, the real property and the tractors and equipment were only partly owned by Defendant. Defendant relies on the documents attached as Exhibit "A" amounting to Sullivan, Jr. 000001 - 000211 in support of this contention.

INTERROGATORY NO. 16: In paragraph 34 of your Counter-Claim you contend that the Plaintiff took possession of certain fund arising out of the sale of a list of real property belonging to the Estate of Wilola Vick Sullivan. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 16 : Please see Response to Interrogatory No. 14 above. Defendant relies on the documents attached as Exhibit "A" amounting to Sullivan, Jr. 000001 - 000211 in support of this contention.

INTERROGATORY NO. 17: In paragraph 36 of your Counter-Claim you contend that you are entitled to compensation for certain actions of the Plaintiff. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and

d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 17: In addition to caring for his mother and father and then his father, Defendant negotiated and closed the sale of all of the property listed above. He personally worked to improve the condo in Memphis. It is further true that because of the disability of his mother and his father's inability and unwillingness to help her, from 2016 until very recently, Defendant could not leave Oxford at all and, for that reason, could not have gainful employment on his own. Defendant's last gainful employment was at a rate of \$125,000.00 a year and that is what he gave up to tend to the needs of his mother, when his father was unable to do that, and then tend to the needs of his father, until his father rejected his help. This was a twenty four hour a day seven days a week job. Not only could Defendant not work professionally but he could not pursue the life he was pursuing prior to moving to Pope. Defendant could not have a social life, attend events with old friends, or meet new friends. This has led to depression that has had to be medically treated, and a very poor quality of life. Given the shift in Plaintiff's behavior, Defendant should be compensated by Plaintiff for the time he spent caring for Plaintiff and Willola Sullivant at a rate of \$125,000 per year. If Defendant had remained in Texas and maintained his career he would be making more then that now. If Plaintiff's mental health and behavior would have been more normal, Defendant could have had a better life while taking care of him. Defendant could not live a normal life because of Plaintiff's willfully bad behavior. Defendant has lost income and quality of life due to Plaintiff's willful and unnecessary actions, including filing this lawsuit. Defendant relies on the documents attached as Exhibit "A" amounting to Sullivant, Jr. 000001 - 000211 in support of this contention.

INTERROGATORY NO. 18: In your Answer you assert the affirmative defense that the

Plaintiff comes before this Court with unclean hands. Please state the following for this defense:

- a. The factual basis for this defense;
- b. A detailed account of each and every occurrence that supports your defense;
- c. Each and every witness which you will rely upon at trial to support this defense; and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 18 : The concept of unclean hands rests on the fact that prior to Defendant doing anything with the \$230,000.00 that was jointly owned by Plaintiff and Defendant, Plaintiff took for his own use, the entire \$230,000.00, and then moved the \$230,000.00 into a newly created account. Plaintiff never returned any of those funds to Defendant, despite the fact that the Defendant was a one-half owner of those funds. Because Plaintiff is accusing Defendant of doing something similar, despite the fact that he promptly returned a portion of the funds he secured, available to Plaintiff, Plaintiff comes to this court with unclean hands and is guilty of the same things that Plaintiff accuses Defendant of in his Complaint, without the return of any portion of those funds.

INTERROGATORY NO. 19: In your Answer you assert the affirmative defense that Plaintiff is entitled to no relief due to his actions being in pari delicto with your actions. Please state the following for this defense:

- a. The factual basis for this defense;
- b. A detailed account of each and every occurrence that supports your defense;
- c. Each and every witness which you will rely upon at trial to support this defense; and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 19 : Please see the description and Response

to Interrogatory No. 18 above.

INTERROGATORY NO. 20: In the Second Affirmative Defense of your Answer you assert a list of defenses. Please state the following for each defense listed:

- a. The factual basis;
- b. A detailed account of each and every occurrence that supports each defense;
- c. Each and every witness which you will rely upon at trial to support each defense; and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 20: Defendant listed as his Second Affirmative Defense a general statement of Affirmative Defenses. Until such time as Plaintiff validly responds to the Interrogatories propounded to Plaintiff and identifies specific acts of wrongdoing by Defendant, Defendant is unable to formulate which, if any, of these additional Affirmative Defenses may apply. Until such time as Plaintiff actually complies with his discovery responsibilities, Defendant reserves the right to supplement this Interrogatory Response.

INTERROGATORY NO. 21: In paragraph 8 of your Answer you contend that you promptly placed \$50,000.00 within Plaintiff's reach in Plaintiff's individual TD AmeriTrade account, paid \$6,000.00 on Plaintiff's credit card, and moved another \$5,000.00 into the joint checking account with Plaintiff and continued to pay his Plaintiff's mortgage and utility bills. Please state the following for your contention:

- a. The factual basis for this contention;
 - b. A detailed account of each and every occurrence that supports your contention;
 - c. Each and every witness which you will rely upon at trial to support this contention;
- and

- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 21: The details and Response to Interrogatory No. 21 are contained in the Accounting filed on the 9th day of December, 2021, in the record of this matter. That Accounting and its attached documents show the \$50,000.00 transferred to Plaintiff's TD AmeriTrade account, the \$6,000.00 paid on Plaintiff's credit card, and the \$5,000.00 put within his reach in the joint account. Further, Defendant continued to pay his Plaintiff's mortgage and utility bills as evidenced in that Accounting.

INTERROGATORY NO. 22: In paragraph 9 of your Answer you contend that all of the steps you took in any of the accounts of your mother or father, was with the express permission of your mother and father at all times and that you had an agreement with the Plaintiff and the Plaintiff had, on several occasions, told you that if you needed any funds you could take the funds and you would not have moved to Mississippi and would not have left your work in Austin Texas to care for your mother without some assurance of this kinds from your mother and father. Please state the following for your contention:

- a. The factual basis for this contention;
- b. A detailed account of each and every occurrence that supports your contention;
- c. Each and every witness which you will rely upon at trial to support this contention;
and
- d. Each and every document which supports this contention.

RESPONSE TO INTERROGATORY NO. 22: Each and every time that Defendant asked Plaintiff for money, because he was not working but caring for his mother and his father, Plaintiff agreed and Plaintiff took steps on his own to transfer funds from his account to the joint account,

at which time, Defendant, because of his rights in the joint account, could access those funds. Each such occurrence was with the agreement, permission and affirmative action taken by Plaintiff. Defendant specifically recalls that on May 16, 2018, Plaintiff told Defendant that if Defendant needed any money, he could take it “because it was all going to be mine.” Plaintiff said this to Defendant many other times. Despite these statements, Defendant never used the Power of Attorney to move any funds from Plaintiff’s personal checking account. He asked his father to take those steps and his father voluntarily did so.

Defendant also moved funds from Plaintiff’s TD Ameritrade account with the consent of Plaintiff to the joint account at Regions Bank for use by Plaintiff, by Defendant and to pay bills and expenses.

INTERROGATORY NO. 23: Itemize all bank accounts in which you own any interest or in which you have any funds, whether in your name or not, and itemize all bank accounts established by or for you, of whatever character, since January 1, 2018, giving the name of the depository, type of account, account number, signator(s), date established, balance on dates established and current balances in each account.

RESPONSE TO INTERROGATORY NO. 23: Defendant objects to Interrogatory No. 23. Until such time as Plaintiff identifies specific transactions that he claims were without authority, this Interrogatory seeks information that is not relevant to this case and is not reasonably calculated to lead to information that is relevant to this case. Further, Plaintiff would only have the right to these extensive financial records in the event that Plaintiff proved that Defendant was guilty of the allegations in the Complaint. In discovery responses from the Plaintiff, in response to questions concerning what specific allegations he raises against Defendant, no additional transactions have

been identified other than them moving of the \$230,000.00 back and forth.

INTERROGATORY NO. 23(a): Do you realize that your answers to the Interrogatories are made under oath and may be used in Court and that in the event your answers should change before the trial of this cause, then you have a duty to supplement your answers thereto?

RESPONSE TO INTERROGATORY NO. 23(a): Yes.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Any and all records, including but not limited to, Federal and State Income Tax Returns, W-2 forms, and all other attachments of said Tax Returns, indicating any and all income received by you from any and all sources from January 1, 2018 to date.

RESPONSE TO REQUEST NO. 1: Defendant objects to Request for Production No. 1. Until such time as Plaintiff identifies specific transactions that he claims were without authority, this Interrogatory seeks information that is not relevant to this case and is not reasonably calculated to lead to information that is relevant to this case.

REQUEST NO. 2: All employment information, including, without limitation, wages, salaries, bonuses, stock options, commissions, earnings, income, employment contracts, pay raises, promotions, payroll deductions, other deductions of any kind, credit union accounts, pension plans, pension funds, retirement plans, retirement funds, stock plans and stock funds and other benefits or deductions of any kind which are, were previously, or which may be in the future paid, available, accepted, rejected, credited, offered, withheld for any purpose by any individual, agency, department, company or otherwise, or to which you are, were or may become entitled in the future at any time from January 1, 2018 to date.

RESPONSE TO REQUEST NO. 2: Please see Response to Interrogatory No. 2.

Defendant has not been employed since January 1, 2018.

REQUEST NO. 3: By way of a Request for Production of Documents, please produce copies of any and all reports referred to in your response to Interrogatory No. 7 above.

RESPONSE TO REQUEST NO. 2: Please see documents included in Exhibit "A," amounting to Sullivant, Jr. 000001 - 000211.

REQUEST NO. 4: By way of a Request for Production of Documents, please produce copies of any and all reports referred to in your response to Interrogatory No. 8 above.

RESPONSE TO REQUEST NO. 4: Please see documents included in Exhibit "A," amounting to Sullivant, Jr. 000001 - 000211.

REQUEST NO. 5: By way of a Request for Production of Documents, please produce copies of any and all reports referred to in your response to Interrogatory No. 9 above.

RESPONSE TO REQUEST NO. 5: Please see documents included in Exhibit "A," amounting to Sullivant, Jr. 000001 - 000211.

REQUEST NO. 6: By way of a Request for Production of Documents, please produce copies of any and all reports referred to in your response to Interrogatory No. 10 above.

RESPONSE TO REQUEST NO. 6: Please see documents included in Exhibit "A," amounting to Sullivant, Jr. 000001 - 000211.

REQUEST NO. 7: By way of a Request for Production of Documents, please produce copies of any and all reports referred to in your response to Interrogatory No. 11 above.

RESPONSE TO REQUEST NO. 7: Please see documents included in Exhibit "A," amounting to Sullivant, Jr. 000001 - 000211.

REQUEST NO. 8: By way of a Request for Production of Documents, please produce