

**IN THE CHANCERY COURT OF LAFAYETTE COUNTY MISSISSIPPI**

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Robert Sullivant Sr.,  
Plaintiff

v.

Robert Sullivant Jr.,  
Defendant.

Case No. 2021-612(W)

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Robert Sullivant Jr.,  
Third-Party Plaintiff,

v.

Robert Sullivant Sr. and  
Evelyn Stevens,  
Third-Party Defendants

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**DEFENDANT AND THIRD-PARTY PLAINTIFF ROBERT SULLIVANT JR'S  
MOTION FOR FEES EXPENDED TO ESTABLISH CONSERVATORSHIP**

Defendant and Third-Party Plaintiff Robert Sullivant Jr., (“JR”), comes now and hereby requests that the court enter an order for the reimbursement of legal fees JR expended while placing his father, Plaintiff and Third-Party Defendant Robert Sullivant Sr., (“SR”), into a conservatorship.

SR initiated this action on October 25, 2023, when he filed his Complaint against JR. On December 9, 2021, JR filed his Answer, Counterclaims, and Affirmative Defenses. One of JR’s Counterclaims was a “**Claim for Conservatorship**”, which was sought in order to place SR into a conservatorship for his own protection.

On May 9, 2023, this Court agreed that SR need a conservator and appointed Sherry Wall, the Clerk of Court, as SR’s Conservator. **Exhibit A**. This conservatorship appointment is sufficient to satisfy the statutory requirement of attorney’s fees, which JR is now entitled to. An

accounting of the fees expended by JR in order to place SR into a conservatorship are attached hereto as **Exhibit B**, *Summary of Legal Expenses*.


The law is very clear on this issue, as Miss. Code §93-20-411(8)(b) explicitly states that; “The costs and expenses of the proceedings ***shall be paid out of the estate of the respondent*** if a conservator is appointed.”

This statute is not ambiguous, as the use of the word “shall” indicates a mandate, and no distinction or reference is made as to *who* becomes conservator. The courts have consistently upheld this principle of statutory interpretation:

The use of the word “shall” makes these provisions mandatory. *See, e.g., Pickering v. Langston Law Firm, P.A.*, 88 So.3d 1269, 1275 (¶ 21) (Miss.2012) (holding that where a statute “includes the mandatory term ‘shall,’ [an appellate court does] not view its restriction as a suggestion—***it is a mandate***”). Further, this Court is “***bound to follow a statute's clear, expressed mandate.***” *Knight v. Miss. Trans. Com'n*, 10 So.3d 962, 968 (¶ 18). *See also Von Brock v. Wal-Mart # 1260*, 105 So. 3d 1151, 1155 (Miss. Ct. App. 2012).

**Wherefore**, pursuant to the foregoing, JR is requesting an order from the court for a total reimbursement of \$28,640.60, from SR’s estate, for his fees expended in placing SR into a conservatorship, which was granted and is now being overseen by the Chancery Court.

Dated: October 3, 2023

/s/   
Robert Sullivan Jr.  
1062 Crawford Cir.  
Oxford, MS 38655  
[robert@steelandbarn.com](mailto:robert@steelandbarn.com)  
(512) 739-9915

## CERTIFICATION

I, Robert Sullivant Jr, hereby certify that on October 3, 2023, I served a copy of the foregoing Motion and all attachments referenced therein to the below counsel of record:

Swayze Alford, Esq. (MSB #8642)  
Kayla Ware, Esq. (MSB #104241)  
Post Office Drawer 1820  
Oxford, Mississippi 38655  
(662) 234-2025 phone  
(662) 234-2198 facsimile

Dated: October 3, 2023

/s/   
Robert Sullivant Jr.  
1062 Crawford Cir.  
Oxford, MS 98366  
robert@steelandbarn.com  
(512) 739-9915

FILED  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

ROBERT SULLIVANT, SR. 2023 MAY 17 PM 3:17

PLAINTIFF

VS.

CHANCERY CLERK

CAUSE NO.: 2021-612 (W)

ROBERT SULLIVANT, JR. BY DC RS

DEFENDANT

ORDER OF APPOINTMENT OF  
GUARDIAN AND CONSERVATOR OF AN ADULT

THE COURT, having considered the Counter-Complaint filed by Robert Sullivant, Jr. and the Motion to Appoint Conservator filed by Robert Sullivant, Sr., and the court having considered the written certificates of two (2) medical examiners under §§ 305 or 407,

Frank Perkins, MD [Examiner One]  
Brian Thomas, [Examiner Two]

**THE COURT FINDS:**

- A. Robert Sullivant, Jr. is entitled to file the Counter-Complaint under §§ 302 or 402;
- B. Notice of Hearing has been provided by law, and Robert Sullivant, Sr. and Robert Sullivant, Jr. were present in court;
- C. Venue in this county is proper;
- D. Robert Sullivant Sr. is an adult born on November 19, 1933;
- E. The Court is satisfied by clear and convincing evidence that the ward, ROBERT SULLIVANT, SR, is a person incapable of managing his or her person or financial affairs under §§ 301 or 401, and that the appointment of a guardian/conservator is necessary to provide for the person's demonstrated needs;
- F. The Court is satisfied by clear and convincing evidence that the above named ward's limitations are primarily  Physical  Mental  Both
- G. Pursuant to §§ 308 and 410, SHERRY WALL is qualified to serve as the

**SCANNED**

Limited             General  
 Guardian            Conservator        Both

H. Based on the current mental and physical condition of the ward, said person's right to retain or obtain a driver's license  **Should**  **Should Not** be affected by the appointment of a Guardian or Conservator of said person.

**IT IS ORDERED AND ADJUDGED:**

**1. APPOINTMENT OF Guardian(s) / Conservator(s)**

The Court appoints SHERRY WALL as

Limited             General  
 Guardian            Conservator        Both

of the adult named in the caption above, with the powers indicated below:  
*(If General is indicated above, move to (2).)*

- |   |  |
|---|--|
| <input type="checkbox"/> Execute Contracts                    | <input type="checkbox"/> Apply for Government Benefits   |
| <input type="checkbox"/> Manage Assets                        | <input type="checkbox"/> Consent for Medical Counseling  |
| <input type="checkbox"/> Manage Property                      | <input type="checkbox"/> Consent for Medical Treatment   |
| <input type="checkbox"/> Travel Decisions                     | <input type="checkbox"/> Lending Money                   |
| <input type="checkbox"/> Borrowing Money                      | <input type="checkbox"/> Paying Bills / Collecting Debts |
| <input type="checkbox"/> Manage a Business                    | <input type="checkbox"/> Making Educational Decisions    |
| <input type="checkbox"/> Determine Daily Dress / Routine      | <input type="checkbox"/> Shop for Food                   |
| <input type="checkbox"/> Shop for Necessities                 | <input type="checkbox"/> Maintain Credit Card            |
| <input type="checkbox"/> Convey Property                      | <input type="checkbox"/> Surrender / Purchase Insurance  |
| <input type="checkbox"/> Revoke POA, DNR, or other Directives | <input type="checkbox"/> Create / Amend a Will or Trust  |
- Provide Financial Support to: \_\_\_\_\_

2.  **BOND (Conservator only):** The Court waives the requirement of a bond.

3. **ACCEPTANCE OF APPOINTMENT:** The Conservator accept her appointment upon her taking of the Oath as prescribed by law and the Court's entrance of this Order.

4. **ANNUAL REPORT OF GUARDIAN(S) / CONSERVATOR(S):** The Guardian/Conservator shall report to the Court on the status of the Adult and the need to continue the appointment on the anniversary of appointment, as required by § 423, by filing the required form with the Clerk of Court. Robert Sullivant Jr. may meet with Sherry Wall at her convenience to review the bank statements on a monthly basis.

5. **DRIVER'S LICENSE:** The right of the ward to retain or obtain a driver's license  is  is not suspended by the appointment of a Guardian/Conservator.

6. **OTHER DUTIES UNDER THE LAW:** The duties of the Guardian(s)/Conservator(s) as required by §§ 312 and 418 and as set forth in this Order shall continue until the Guardian(s)/Conservator(s) is/are discharged from these duties by order of this Court.

7. **NOTICE:** The following individuals are entitled to notice of this order and any attachments under §§ 309 and 411:

Robert Sullivant, Jr.

**SO ORDERED AND ADJUDGED**, in open court, this the 17<sup>th</sup> day of May, 2023.

*Roseanne Whitman*

CHANCELLOR

Approved as to form:

*Swayze Alford*

SWAYZE ALFORD (MSB #8642)  
KAYLA WARE (MSB #104241)  
Counsel for Robert Sullivant, Sr.

*Robert Sullivant, Jr.*

ROBERT SULLIVANT, JR  
*Pro Se*

**EXHIBIT B**  
**SUMMARY OF LEGAL EXPESNSES**  
**DETAIL ON FOLLOWING PAGES**

<b>DATE</b>	<b>PAYEE</b>	<b>DESC</b>	<b>INV NO</b>	<b>AMT</b>
12/3/2021	Holcomb Dunbar	Legal Fees	26194	\$ 6,206.78
2/16/2022	Holcomb Dunbar	Legal Fees	27371	14,292.32
8/3/2022	Daniel Coker	Legal Fees	280057	3,141.50
3/28/2022	Thomas Neurohycology	Independent Medical Examination		3,000.00
11/14/2022	Huseby	Stevens Deposition	761344	1,000.00
11/28/2022	Huseby	Stevens Deposition	762697	1,000.00
				<u>\$28,640.60</u>

  
**HOLCOMB DUNBAR**  
ATTORNEYS

*Holcomb, Dunbar, Watts, Best, Masters & Golmon, P.A.*  
400 Enterprise Drive Post Office Drawer 707 Oxford, MS 38655  
662.234.8775 Fax 662.238.7552

Robert Sullivant, Jr.  
1002 Crawford Circle  
Oxford, MS 38655

Statement Date:  
Invoice No.  
Account No.

12/03/2021  
26194  
121197  
Page: 1

RE Robert Sullivant, Sr. v. Robert Sullivant, Jr.

	PREV. BALANCE	FEES	EXPENSES	PAYMENTS	BALANCE
121197	0.00	6,206.25	0.53	0.00	<u>\$6,206.78</u>

Tax ID No.: 64-0479671  
**Please return a copy of the cover page with your remittance.**  
**Thank You.**





**HOLCOMB DUNBAR**  
ATTORNEYS

*Holcomb, Dunbar, Watts, Best, Masters & Golmon, P.A.*  
400 Enterprise Drive Post Office Drawer 707 Oxford, MS 38655  
662.234.8775 Fax 662.238.7552

Robert Sullivant, Jr.  
1002 Crawford Circle  
Oxford, MS 38655

Statement Date: 12/03/2021  
Invoice No. 26194  
Account No. 121197.  
Page: 1

RE Robert Sullivant, Sr. v. Robert Sullivant, Jr.

			HOURS
11/10/2021	TJS	Emails to/from Robert Sullivant, Jr.; review Complaint	0.75
11/11/2021	BTG	Review Complaint (.40); review Delta (.30); C with R. Sullivant (.50); P/c with S. Alford - left message (.10)	1.30
	BTG	P/c with S. Alford (.20); detailed email to R. Sullivant (.40); review reply (.10)	0.70
	TJS	Meeting with BTG regarding background and current claims; rec/rev. Robert Sullivant, Jr.'s emails and offer to buy on property; lengthy p/c with Robert regarding same; study pleadings, records; emails to Robert regarding needed information and records and meeting to discuss/prepare for court; additional emails to/from Robert with attachments; outline issues, possible defenses; lengthy meeting with BTG and Robert regarding issues and procedure, needed information and documents; rec/rev/respond numerous emails to/from Robert and BTG regarding lawsuit issues, needed information and records, potential sale of land	3.90
11/12/2021	BTG	Review Sullivant, Jr. emails and papers (x3) (.40); review Deed (.20); review check (.10); review Settlement Statement (.40); review T.D. AmeriTrade account papers (.30); review credit card payment evidence (.20); p/c with Sullivant, Jr. (.50); review and revise letter to Alford (.30); email to Sullivant, Jr. (.20)	2.60
	TJS	Rec/rev/respond to emails to/from client and BTG, including attached records; rec/rev. records from Robert, additional emails/correspondence with needed information and documents	0.75
	MS	Preparation of BTG dictation of correspondence to Swayze Alford (.20)	0.20
11/15/2021	TJS	Monitor and comment on numerous emails to/from Robert and	

Robert Sullivant, Jr.

Page: 2  
December 03, 2021  
ACCOUNT NO: 121197M  
INVOICE NO: 26194

Robert Sullivant, Sr. v. Robert Sullivant, Jr.

			HOURS	
		BTg; review title references to Sullivant family land in partition suit; brief meeting with BTG regarding issues and defenses to claims	0.75	
	BTG	Review Robert Sullivant, Jr. emails (x3) (.30); prepare deductions list and calculation (.40); email to Sullivant, Jr. (.20); review Deed information from TJS (.30); review and reply to Sullivant emails (x2) (.20)(.20); review collection letter (.10)	1.70	
	BTG	Review R. Sullivant, Jr. emails (x3) (.30); reply to same (x3) (.40); review State Farm papers (.20); review \$5,000.00 transfer (.10); p/c with S. Alford (x2) (.10) (.20); email to S. Alford (.10); review Schwab papers and Alford emails (.20)	1.60	
11/16/2021	BTG	Review and reply to R. Sullivant, Jr. email (.20); review S. Alford Order (.20); p/c with Sullivant (.30); email to Sullivant (.30)	0.80	
	MS	Preparation of correspondence to Court Administrator for Judge Whitwell enclosing proposed Agreed Order Granting Approval of Sale of LA Property (.20)	0.20	
11/17/2021	TJS	Rec/rev. and comment on numerous emails with client, BTG and opposing counsel and pleadings	0.30	
	BTG	Review Complaint (.30); outline Response and Counter-Claim (.75); review Contract (.20); email to Sullivant, Jr. (.10); emails to and from Sullivant, Jr. (.20); review account papers (.75); prepare Answer and Counter-Claim (.50); review Contract (.20); email to R. Sullivant, Jr. (.10); email to S. Alford (.20)	3.10	
11/18/2021	BTG	Email from and to TJS regarding Contract (.10)	0.10	
11/19/2021	BTG	Review Sullivant, Jr. email and reply to same (.10)	0.10	
11/22/2021	BTG	Review and revise Answer and Counter-Claim (.50); email same to Sullivant (.20); review reply (.10); respond to same (.10)	0.90	
	MS	Preparation of BTG dictation of Answer, Affirmative Defenses and Counter-Claim (.90); preparation of BTG dictation of draft email to S. Alford (.10)	1.00	
11/29/2021	BTG	C with Sullivant, Jr. (1.50); review and revise Answer and Counter-Claim (.30); P/c with Swayze Alford - left message (.10)	1.90	
11/30/2021	BTG	Review notes (.40); revise Counter-Claim (.30)	0.70	
	MS	Preparation of BTG dictation of revisions to Answer, Affirmative Defenses and Counter-Claim (.30)	0.30	
		FOR CURRENT SERVICES RENDERED	23.65	6,206.25

Robert Sullivant, Jr.

Page: 3  
December 03, 2021  
ACCOUNT NO: 121197M  
INVOICE NO: 26194

Robert Sullivant, Sr. v. Robert Sullivant, Jr.

<u>TIMEKEEPER</u>	<u>RECAPITULATION</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
Thomas J. Suszek		6.45	\$275.00	\$1,773.75
Brad T Golmon		15.50	275.00	4,262.50
Melinda Stricklin		1.70	100.00	170.00

11/16/2021	Postage			<u>0.53</u>
	Postage			<u>0.53</u>
	TOTAL EXPENSES			<u>0.53</u>
	INVOICE TOTAL			<u>\$6,206.78</u>

Tax ID No.: 64-0479671

Please return a copy of the cover page with your remittance.

Thank You.

**EXHIBIT B**  
**SUMMARY OF LEGAL EXPESNSES**  
**DETAIL ON FOLLOWING PAGES**

<b>DATE</b>	<b>PAYEE</b>	<b>DESC</b>	<b>INV NO</b>	<b>AMT</b>
12/3/2021	Holcomb Dunbar	Legal Fees	26194	\$ 6,206.78
2/16/2022	Holcomb Dunbar	Legal Fees	27371	14,292.32
8/3/2022	Daniel Coker	Legal Fees	280057	3,141.50
3/28/2022	Thomas Neurohycology	Independent Medical Examination		3,000.00
11/14/2022	Huseby	Stevens Deposition	761344	1,000.00
11/28/2022	Huseby	Stevens Deposition	762697	1,000.00
				<u>\$ 28,640.60</u>



**HOLCOMB DUNBAR**  
ATTORNEYS

*Holcomb, Dunbar, Watts, Best, Masters & Golmon, P.A.*  
400 Enterprise Drive Post Office Drawer 707 Oxford, MS 38655  
662.234.8775 Fax 662.238.7552

Robert Sullivant, Jr.  
1002 Crawford Circle  
Oxford, MS 38655

Statement Date:  
Invoice No.  
Account No.

02/16/2022  
27371  
121197.  
Page: 1

RE Robert Sullivant, Sr. v. Robert Sullivant, Jr.

	PREV. BALANCE	FEES	EXPENSES	PAYMENTS	BALANCE
121197	6,206.78	14,113.75	178.57	-6,206.78	<u>\$14,292.32</u>

Tax ID No.: 64-0479671

**Please return a copy of the cover page with your remittance.**

**Thank You.**



**HOLCOMB DUNBAR**  
ATTORNEYS

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662.234.8775 Fax 662.238.7552

Robert Sullivant, Jr.  
1002 Crawford Circle  
Oxford, MS 38655

Statement Date: 02/16/2022  
Invoice No. 27371  
Account No. 121197.  
Page: 1

RE Robert Sullivant, Sr. v. Robert Sullivant, Jr.

			HOURS
12/01/2021	BTG	Review Counter-claim (.40); review Accounting exhibits (.30); prepare Accounting (.50); revise Accounting (.40); email to R. Sullivant, Jr. (.20)	1.80
12/02/2021	BTG	Review and revise Accounting (.20)	0.20
12/08/2021	BTG	Email to R. Sullivant, Jr. (.20); review reply and respond to same (.30); review additional data for Answer (.50); review and revise Answer (.30); email same to R. Sullivant, Jr. (.20)	1.50
	MS	Assist preparation of Answer, Affirmative Defenses and Counter-Claim (.30)	0.30
12/09/2021	MS	Make revisions and finalize Answer, Affirmative Defenses and Counter-Claim (.10); make revisions to Accounting (.10)	0.20
12/10/2021	BTG	Review Complaint (.30); review Counter-claim and Accounting (.30); prepare outline for discovery to Sr. (.30); prepare discovery to Sr. (.60); review and revise same (.20); review email from Jr. and reply to same (.20); review utility and Home Depot payments (.30); email to S. Alford regarding same (.20)	2.40
	MS	Assist preparation of discovery to be propounded to Sullivant, Sr. (.30); preparation of Notice of Service regarding discovery (.20); electronically file three Notices of Service (0.30)	0.80
12/13/2021	BTG	Meet with Jr. regarding discovery to Sr. (.70); review and revise discovery to Sr. (.20); email to S. Alford (.20); email to Sullivant, Jr. (.10)	1.20
	MS	Finalize 1st Set of Rogs, RFP and RFA to Sullivant, Sr. (.20); preparation of Notice of Service regarding discovery requests (.20)	0.40
12/17/2021	BTG	Review and reply to Jr.'s email (.10)	0.10

February 16, 2022

ACCOUNT NO: 121197M

INVOICE NO: 27371

Robert Sullivant, Jr.

Robert Sullivant, Sr. v. Robert Sullivant, Jr.

			HOURS
12/21/2021	BTG	Review and reply to Jr.'s email (.10); review and reply to K. Ware email (.20); email discovery to Jr. (.10); review reply and respond to same (.10)	0.50
12/27/2021	BTG	Review discovery requests from Sr. (.50); prepare summary (1.20); review Counter-claim details (.40); detailed email to Jr. (.40); emails to and from Jr. (.20); p/c with S. Alford, left message (.10)	2.80
12/28/2021	BTG	P/c with S. Alford, left message (.10); p/c with S. Alford (x2) (.20); email to and from S. Alford (.20); review spreadsheets (.40); emails to and from Jr. (.40); p/c with R. Sullivant, Jr. (.40); review Sales Contract (.30); detailed email to S. Alford (.40); p/c with S. Alford (.20); email to Jr. (.10)	2.70
01/04/2022	BTG	Email to Jr. (.10); review reply and respond to same (.10); emails to and from S. Alford (.30); review calendar for hearing dates (.10)	0.60
01/13/2022	TJS	Rec/rev/respond client's email after casefile review and check court's online docket	0.30
01/17/2022	BTG	Review Sr. discovery responses (.60); prepare summary memo (.40); review discovery from Sr. (.40); review Jr.'s summary papers (1.25); review Jr. email regarding cousin in Texas (.10); review Jr. detailed email regarding Sr.'s discovery responses (.40); review Interrogatory notes (.30); review photographs (.20)	3.65
01/18/2022	BTG	Review and reply to Jr. email (.20); p/c with M. Moore, left message (.10); email to Jr. (.10); review Condo Deed and Settlement Statement (.30); reply to Jr. (.20); review and revise email to Jr. regarding accounts (.20); prepare discovery responses (1.30); review and revise same (.20); email draft to Jr. (.10); prepare Subpoena to Witnesses (.30); prepare Subpoena Duces Tecum to Regions Bank (.20); revise Interrogatory No. 20 (.40); email to and from Jr. regarding address (.10)	3.70
	BTG	Review additional closing papers and Deeds (.30); review and revise email to Jr. regarding same (.10)	0.40
01/19/2022	JGB	Review prior file to locate 3 Deeds prepared in 2018; email to client/TJS/BTG with same	0.40
	TJS	Rec/rev/respond client's email regarding needed records; begin search for same	0.20
	BTG	Review and reply to Jr. email (.20); p/c with Katherine Victor, left message (.10); email to Victor (.20); review Liddell letter (.20); email same to Jr. (.20); p/c with Liddell (.20); memo to file (.10); email to Liddell (.30); email to Jr. regarding same (.10); review and revise discovery responses (.40); detailed email to Jr. regarding closings (.60); review and reply to Jr. email regarding Liddell (.10); prepare list of documents for production (.50); review Estate Orders (.20); review enrolled Deeds (.30); email to Jr. regarding property claim (.30); review Counter-Claim (.20); review and revise discovery responses (1.10); email same to Jr. (.10)	5.50
01/20/2022	BTG	Review Decree Closing Estate (.20); update document list (.20); email to Jr. (.10); review reply (.30); review and revise discovery responses (.75); detailed email to Jr. regarding same (.40); text messages from and to K. Ware (.20);	

February 16, 2022

ACCOUNT NO: 121197M

INVOICE NO: 27371

Robert Sullivant, Jr.

Robert Sullivant, Sr. v. Robert Sullivant, Jr.

			HOURS
		email to Jr. regarding two-factor authentication (.10); email revised discovery to Jr. (.20); email to and from Jr. regarding T.D. AmeriTrade account (.20); email to and from Jr. regarding discovery responses (.30); review and revise discovery responses (.30); email same to Jr. (x2)(.30); review Deed and Deed of Trust (.30); update documents and list (.40); email regarding same to Jr. (.10); email from and to Jr. regarding Condo (.20)	4.25
	MS	Revise document list and add several documents per BTG and re-bates number same (.30);	0.30
01/21/2022	TJS	Study records, assist trial preparation; meeting with BTG regarding issues and discovery responses	0.60
	BTG	Email to Jr. regarding Deed and Deed of Trust (.25); review and revise discovery responses (.50); email to Jr. regarding same (.10); review documents for production (1.25); message to and reply from K. Ware (.20); p/c with K. Ware (.20); email to Jr. regarding same (.20); conf with Jr. to discuss and execute discovery (.50); prepare notes for trial outline (.40); review pleadings (.30); prepare outline for Jr.'s testimony (.50)	4.40
01/24/2022	BTG	Prepare Agreed Order (.30); email same to K. Webb (.10); review reply and Order (.10); email to Jr. (.10); review and reply to Jr. email (.20); review S. Kidd email and reply to same (.30); review Subpoena Duces Tecum (.10)	1.20
01/25/2022	BTG	Review S. Alford email regarding new witness (.10); p/c with Natasha Willingham, left message (.10)	0.20
01/27/2022	BTG	Review and revise trial plan (.30); review and revise Jr. exam (1.0); cross-reference with documents and exhibits (.50); review Kidd email with documents (.20); reply to same (.10); email same to Alford and Ware (.10); review produced checks (.40); review summary spreadsheet (.25); email same to Jr. (.10); review and reply to Court Administrator (.10); meet with Jr. regarding trial and testimony (1.25); p/c with S. Alford regarding "mending fences" (.25); email to Jr. regarding same (.20); review Jr. email regarding Evelyn (.10)	4.85
01/28/2022	BTG	Email to Jr. regarding plan (.25); check websites and p/cs with psychologists offices (x4) (.80); email to Jr. regarding Hobbs (.10); email to Jr. regarding M. Campbell (.10); review Campbell website and p/c with Campbell, left message (.10); p/c with Campbell (.20); p/c with S. Alford (.20); collect statute sections (.50); email same to S. Alford (.20); prepare Order for IME (.30); email to S. Alford (.10); email to Court Administrator (.10); p/c with D. Howard (.30); revise Order (.20); email same to Alford (.10); review court's calendar (.20); email dates to Alford (.10); review reply and respond to same (.10); email from and to Alford regarding witnesses (.30)	4.25
	BTG	Email to S. Kidd (.20); email to R. Liddell (.20); review reply and respond to same (.10); review Alford email regarding David Howard (.10); review emails from S. Kidd and reply to same (.10); review S. Harmon email with details (.20)	0.80
01/31/2022	BTG	Email to Jr. regarding signing Closing papers (.10); email to Alford regarding Order (.10); review Jr. reply and respond to same (.10); review Jr. email regarding Tri-Lakes and reply to same (.20); email to and from Alford	



Robert Sullivant, Jr.

Robert Sullivant, Sr. v. Robert Sullivant, Jr.

	HOURS	
regarding costs (.20); meet with Jr. (.40); review executed papers (.20); email same to Liddell and originals to Matt Moore (.25); p/c with Dr. Stanley (.30); p/c with Dr. Savell (.20); p/c with Dr. Brian Thomas (.30)	2.35	
<b>FOR CURRENT SERVICES RENDERED</b>	<u>52.85</u>	<u>14,113.75</u>

RECAPITULATION			
TIMEKEEPER	HOURS	RATE	TOTAL
Thomas J. Suszek	1.10	\$275.00	\$302.50
Brad T Golmon	49.35	275.00	13,571.25
Melinda Stricklin	2.00	100.00	200.00
Janet Brower	0.40	100.00	40.00

01/26/2022	Jeff Edge - service of trial subpoenas (Calvin Vick and Mary Stevens Cost Advanced -	124.20 <u>124.20</u>
01/21/2022	Travel - service of subpoenas Mileage -	48.56 <u>48.56</u>
12/09/2021	Postage	2.56
01/18/2022	Postage	0.93
01/18/2022	Postage	0.53
01/19/2022	Postage	0.53
01/25/2022	Postage	0.73
01/27/2022	Postage	0.53
	Postage	<u>5.81</u>
	<b>TOTAL EXPENSES</b>	<u>178.57</u>
	<b>PREVIOUS BALANCE</b>	<b>\$6,206.78</b>
12/20/2021	Received on account Robert Sullivant Jr check #2212	-6,206.78
	<b>INVOICE TOTAL</b>	<u><b>\$14,292.32</b></u>

Tax ID No.: 64-0479671

**Please return a copy of the cover page with your remittance.  
Thank You.**

August 3, 2022

Robert Sullivan, Jr.  
 1002 Crawford Circle  
 Oxford, MS 38655

Our File #: 7337-139999  
 Invoice #: 280057

**Total Amount Due** **\$0.00**

Sullivant, Robert, Sr. v. Robert Sullivant, Jr.

Our Federal ID #: 64-0653454

Claim Number: 2021-612(W)

Initial Statement  
 0287

**PAYMENT FOR TOTAL AMOUNT DUE UPON RECEIPT  
 PLEASE INCLUDE INVOICE NUMBER WITH YOUR PAYMENT**

Advance Cost

Date	Description	Amount
06/03/22	Online Research.	N/C
Total Disbursements for Matter		\$0.00

Itemization of time

Date	Atty Initials	Hours	Description	Amount
05/02/22	MOD	0.3	Correspondence to and from Mr. Sullivant on retention and strategy and meet with Mr. Sullivant on same	N/C
05/02/22	MOD	0.1	Correspondence to Mr. Golmon on substitution	22.50
05/02/22	MOD	0.1	Correspondence to Mr. Golmon on substitution	N/C
05/02/22	MJW	0.4	Draft Agreed Order of Withdrawal and Substitution of Counsel for Robert Sullivant, Jr. and corresponded to all counsel of record sending the same	68.00
05/03/22	MJW	0.5	Review and analyze documents received from Robert Sullivant, Jr.	85.00
05/03/22	MJW	0.1	Correspondence to plaintiff's counsel requesting signature of Agreed order substituting defense counsel	17.00

05/05/22	MOD	1.4	Review materials received to date on conservatorship status, expert reports, Hobbes deposition and Correspondence to and from Mr. Sullivant on same(multiple)	N/C
05/05/22	MJW	2.5	Review and analyze Mississippi law regarding the Guardian and Conservatorship Act's requirement that two medical opinions be presented for chancellor review in determining conservatorship and what kind of medical opinions must be submitted	N/C
05/06/22	MBJ	0.5	Document Management of documents/materials received from client	50.00
05/10/22	MOD	0.1	Correspondence to and from Mr. Sullivant on status of substitution and strategy (multiple x4)	22.50
05/12/22	MJW	0.1	Correspondence with Brad Golmon by email regarding filed and signed agreed order allowing substitution and status of us receiving his file on the case	17.00
05/12/22	MJW	0.1	Correspondence to Robert Sullivant, Jr. by email sending signed and filed agreed order allowing substitution of counsel and advising we are working on getting Golmon file on the case	17.00
05/13/22	MOD	0.1	Review chronology provided by client	22.50
05/13/22	MOD	1.2	Meet with client on plan and strategy (1:30-2:48)	N/C
05/13/22	MOD	0.2	Telephone conversations and Correspondence to Estate and Tax Lawyers on GAP Act medical opinion requirements (multiple x6)	N/C
05/13/22	MOD	0.3	Prepare Correspondence to Mr. Alford on farm equipment, tractor, taxes for 2021, truck, TD Ameritrade lock-out	67.50
05/13/22	MOD	0.2	Prepare Notice and Demand Letter to Josh Vick on Mahindra tractor	45.00
05/19/22	MJW	2.4	Review and analyze documents received from Brad Golmon	N/C
05/20/22	MOD	0.1	Correspondence to and from Mr. Sullivant on status of strategy decisions and communication with counsel (multiple)	22.50
05/20/22	MOD	0.3	Telephone conversation with Mr. Alford on status and possible settlement (multiple)	67.50
05/20/22	MOD	0.1	Correspondence to Mr. Sullivant on proposed resolution offer per Mr. Alford (5/22)	22.50

05/23/22	MOD	0.2	Receive and study correspondence from and Correspondence to Mr. Sullivant on proposed resolution and response (multiple)	45.00
05/23/22	MOD	0.2	Correspondence to Mr. Alford on response to proposal	45.00
05/23/22	MOD	0.1	Receive and study correspondence from Mr. Sullivant on farm equipment	22.50
05/24/22	MJW	0.1	Correspondence by phone with robert sullivant jr regarding an update on the case and letter to be sent to cousin regarding farm equipment	17.00
05/25/22	MOD	0.3	Prepare outline of file tasks for Associate performance per request of client for status and document review while opposing counsel is out of town	67.50
05/27/22	MJW	1.3	Prepare motion to exclude opinion of Dr. Hobbs and brief in support thereof	221.00
05/31/22	MJW	4.2	Prepare to Exclude Opinion Testimony of Dr. Milton Hobbs and brief in support thereof	714.00
06/01/22	MJW	2.2	Prepare motion to exclude testimony of Dr. Hobbs and brief in support thereof	374.00
06/02/22	MJW	5.4	Continue to prepare motion to exclude opinion of milton hobbs and brief in support thereof	N/C
06/03/22	MOD	0.5	Review, supplement, review and prepare further work outline on Motion to Exclude Hobbs	112.50
06/03/22	MOD	0.1	Prepare sources of available research for associate to avoid additional research expenses	22.50
06/03/22	MJW	1.9	Prepare motion to exclude testimony and opinions of dr. hobbs and brief in support thereof	323.00
06/06/22	MOD	0.5	Review, revise and supplement Motion and Brief on the exclusion of Doctor Hobbes	N/C
06/06/22	MJW	3.9	Prepare motion to strike or exclude testimony of Dr. Milton Hobbs and brief in support thereof	N/C
06/06/22	MJW	0.1	Correspondence by email to Robert Sullivant Jr sending drafts of motion to exclude	17.00
06/13/22	MOD	0.2	Receive and study correspondence from and Correspondence to Mr. Sullivant with final review of demand letters and comments on Motion (multiple)	45.00

August 3, 2022  
7337-139999



06/15/22	MOD	0.2	Telephone conversation with Josh Vick about red Mahindra tractor	45.00
06/15/22	MOD	0.1	Telephone conversation with Mr. Wall on market rate for tractor storage	22.50
06/15/22	MOD	0.2	Receive and study correspondence from and Correspondence to Mr. Sullivant on Vick response to tractor demand and storage fee request	45.00
06/16/22	MJW	1.2	Continued work on motion to exclude opinion of Dr. Hobbs and brief in support thereof with additional research on law supporting motion necessary to present arguments to court, unsupported arguments will not be considered by court	N/C
06/17/22	MOD	0.1	Correspondence to and from Mr. Sullivant on status of issues and strategy (multiple x4)	22.50
06/17/22	MOD	0.1	Correspondence to and from Mr. Sullivant on legal action to recover tractor (multiple)	22.50
06/20/22	MOD	0.1	Telephone conversation from Mr. Sullivant on tractor recovery	22.50
06/20/22	MOD	0.9	Meet with Mr. Sullivant on status of case and on claims for recovery of equipment outside of conservatorship	202.50
06/20/22	MJW	0.7	Revise and finalize Motion to Exclude Dr. Hobbs testimony and Brief in support thereof with exhibits to establish veracity of facts asserted and grounds for exclusion of Hobbs testimony	N/C
06/29/22	MOD	0.2	Correspondence to Mr. Alford on Court hearing of Motion to Strike Hobbs with docket evaluation to achieve earliest possible resolution of motion	45.00
06/29/22	MOD	0.8	Receive and study correspondence from Mr. Sullivant updating Vick criminal action and requesting evaluation of new claims and providing evaluation and recommendation on new strategies (multiple)	N/C
06/29/22	MJW	0.5	Review file to determine if second set of discovery requests was served, when served, if received responses, and prepared good faith letter to plaintiff's counsel regarding past due discovery requests	85.00
07/06/22	MJW	0.1	Correspondence by email to Brad Golmon requesting copies of recent discovery requests to Robert Sullivant, Sr.	17.00

August 3, 2022  
7337-139999



07/11/22	MOD	0.1	Correspondence to and from Mr. Sullivant on status and strategy (multiple)	22.50
07/12/22	MJW	0.1	Correspondence to plaintiff's counsel by email regarding available hearing dates	17.00
Total Fees for Matter				\$3,141.50

Summary by Timekeeper

<u>Timekeeper Name</u>	<u>Hours</u>	<u>Amount</u>
Driskell, Mitchell O	4.90 Hours at \$225.00/HR =	\$1,102.50
Driskell, Mitchell O	4.50 Hours at \$0.00/HR =	\$0.00
Watson, Marissa J	11.70 Hours at \$170.00/HR =	\$1,989.00
Watson, Marissa J	16.10 Hours at \$0.00/HR =	\$0.00
Jordan, Mary B	0.50 Hours at \$100.00/HR =	\$50.00

Summary by Rank

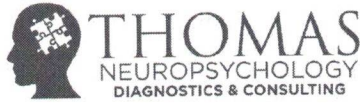
<u>Timekeeper Name</u>	<u>Hours</u>	<u>Amount</u>
Director	9.40 Hours at \$117.29/HR =	\$1,102.50
Associates	27.80 Hours at \$71.55/HR =	\$1,989.00
Paralegals	0.50 Hours at \$100.00/HR =	\$50.00

**Total Hours: 37.70**

**Total Amount: \$3,141.50**

SUMMARY:

Total Advanced Cost:	\$0.00
Total Current Fees:	\$3,141.50
Invoice Total:	\$3,141.50
Less Trust Applied:	-\$3,141.50
Total Balance Now Due:	<u><u>\$0.00</u></u>



Brian Thomas, Psy. D. ABPP/ Board Certified in Clinical Neuropsychology  
144 South Thomas Street Suite 104A /Tupelo, MS 38801  
www.thomasneuropsychology.com

Bill for Services Rendered

28 March 2022

To: Swayze Alford, JD

RE: Robert Sullivant, Sr

Date of Service: March 23, 2022

Total Amount Due: 0 - prepayment of 4500 already received.

Total time spent towards case = 8 hr @ 375 = 3000.

Please advise if this will conclude my services in this case. If so, I will issue a refund of the unused retainer. Please advise to whom the check should be written and mailed.

Brian Thomas, PsyD PLLC  
144 South Thomas St. Suite 104A  
Tupelo, MS 38801

If you have questions regarding this bill, please call: 662.231.8916.



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Corporate Headquarters  
1230 West Morehead St., Suite 408  
Charlotte, NC 28208  
Questions? Call (800) 333-2082

Invoice

#761344

**Robert Sullivant, Jr. Pro Se**  
Robert Sullivant, Jr.  
1002 Crawford Circle  
Oxford MS 38655  
United States

Invoice Date	Terms	Due Date	Job Date	Job Number
11/14/2022	DUR, after 30 days 1.5%	11/14/2022	11/15/2022	426218
Case Number	Case Name			
2021-612(W)	Robert Sullivant, Sr. v Robert Sullivant, Jr.			

Mary H. "Evelyn" Stevens - Deposit

1,000.00

**TOTAL DUE >>>**

**\$1,000.00**

Location of Job: Lafayette County Courthouse Chancery Division  
Oxford, MS 38655

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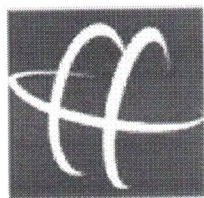
**Tax ID:** 31-1763752

Remit to: **Huseby Global Litigation**  
**P.O. Box 6180**  
**Hermitage, PA 16148-0922**



761344





# Huseby.com

Corporate Headquarters  
1230 West Morehead St., Suite 408  
Charlotte, NC 28208  
Questions? Call (800) 333-2062

# Invoice

## #762697

**Robert Sullivant, Jr. Pro Se**  
Robert Sullivant, Jr.  
1002 Crawford Circle  
Oxford MS 38655  
United States

Invoice Date	Terms	Due Date	Job Date	Job Number
11/28/2022	DUR, after 30 days 1.5%	11/28/2022	11/15/2022	426218
Case Number	Case Name			
2021-612(W)	Robert Sullivant, Sr. v Robert Sullivant, Jr.			

ORIGINAL TRANSCRIPT OF:

Mary H. "Evelyn" Stevens

1,000.00

**TOTAL DUE >>>**

**\$1,000.00**

Credits Applied \$1,000.00

Net Total \$0.00

Location of Job: Lafayette County Courthouse Chancery Division  
Oxford, MS 38655

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**Tax ID:** 31-1763752

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762697