

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

ROBERT SULLIVANT, SR.

PLAINTIFF

VS.

CAUSE NO.: 2021-612(W)

ROBERT SULLIVANT, JR.

DEFENDANT

FILED
STATE OF MISSISSIPPI
LAFAYETTE COUNTY
2022 DEC -5 P 2:28
CHANCERY CLERK
BY DC [Signature]

PLAINTIFF'S MOTION TO APPOINT CONSERVATOR

COMES NOW Plaintiff, Robert Sullivant, Sr. ("Sullivant, Sr."), by and through undersigned counsel, and files this his *Motion to Appoint Conservator* against Defendant, Robert Sullivant, Jr. ("Sullivant, Jr."), and in support thereof would state as follows:


1. The Plaintiff, Robert Sullivant, Sr., is an adult resident citizen of Lafayette County, Mississippi.
2. That on or about October 25, 2021, Sullivant, Sr. filed his *Complaint* in this matter when he discovered that Sullivant, Jr. had withdrawn \$230,000.00 from an account in Sullivant Sr.'s name alone using a Power of Attorney that Sullivant, Sr. had cancelled.
3. On or about December 9, 2021, Sullivant, Jr. filed his *Answer, Affirmative Defenses, and Counter-Claim*, wherein he requested a Conservator be appointed for his father, Sullivant Sr.
4. That on February 8, 2022, the parties entered into an *Agreed Order for Independent Medical Exams* wherein the Court appointed two physicians, including Dr. Brian Thomas, to conduct said IMEs of Sullivant, Sr.
5. Following an evaluation of Sullivant, Sr., Dr. Thomas found that Sullivant, Sr. was in need of a conservator for his financial affairs.
6. Sullivant, Sr. is in agreement for a conservator to be appointed for the sole purpose

of managing his financial affairs and requests that the Court appoint Sherry Wall as his conservator.

WHEREFORE PREMISES CONSIDERED, Robert Sullivant, Sr., respectfully requests that this Court enter its order appointing Sherry Wall as his Conservator for the sole purpose of managing his financial affairs.

RESPECTFULLY SUBMITTED this 5 day of December, 2022.

ROBERT SULLIVANT, SR., Plaintiff

BY: 
SWAYZE ALFORD (MSB #8642)
KAYLA WARE (MSB #104241)

OF COUNSEL:

SWAYZE ALFORD

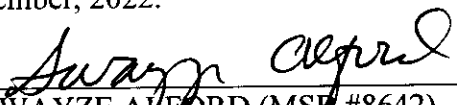
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(662) 234-2198 fax
Counsel for Robert Sullivant, Sr.

CERTIFICATE OF SERVICE

I, Swayze Alford, attorney for Robert Sullivant Sr., do hereby certify that I have this day forwarded, via email, a true and correct copy of the above and foregoing *Plaintiff's Motion to Appoint Conservator* to the following:

Robert Sullivant, Jr.
robert@steelandbarn.com

SO CERTIFIED, this the 5 day of December, 2022.


SWAYZE ALFORD (MSB #8642)