



Robert Sullivant <robert@steelandbarn.com>

Re: Sullivant Order

8 messages

Hale Freeland <hale@freelandmartz.com> Thu, Aug 31, 2023 at 9:09 AM
 To: Samantha Weathersbee <SWeathersbee@lafayettecoms.com>
 Cc: Walt <waltdavis@hgd-oxford.com>, "Robert Sullivant, Jr" <robert@steelandbarn.com>, Swayze <salford@swayzealfordlaw.com>

Please see the order that has not been circulated

Hale

On Thu, Aug 31, 2023 at 8:28 AM Samantha Weathersbee <SWeathersbee@lafayettecoms.com> wrote:

Hale,

We are in a Lafayette term & need the order granting your motion to quash by lunch today.

Best,

Samantha

Sent from my iPhone

--



J. Hale Freeland
 Admitted in MS, TN, and MO
 Freeland Martz, PLLC
 302 Enterprise Drive, Ste. A
 Oxford, MS 38655-2762
 T 662.234.1711 | Toll Free 844.671.1711
 hale@freelandmartz.com | www.freelandmartz.com



2 attachments

Perkins. Sullivant matter.pdf
51K

23.06.22 order to quash.docx
13K

Samantha Weathersbee <SWeathersbee@lafayettecoms.com>

Thu, Aug 31, 2023 at 9:50 AM

To: Hale Freeland <hale@freelandmartz.com>
Cc: Walt <waltdavis@hgd-oxford.com>, "Robert Sullivant, Jr" <robert@steelandbarn.com>, Swayze <salford@swayzealfordlaw.com>

Received. I made some corrections to it & the judge has signed it. It will be filed today.

Sent from my iPhone

On Aug 31, 2023, at 9:10 AM, Hale Freeland <hale@freelandmartz.com> wrote:

[Quoted text hidden]

<Perkins. Sullivant matter.pdf>
<23.06.22 order to quash.docx>

Robert Sullivant <robert@steelandbarn.com>

Thu, Aug 31, 2023 at 12:02 PM

To: Hale Freeland <hale@freelandmartz.com>

Cc: Samantha Weathersbee <SWeathersbee@lafayettecoms.com>, Walt <waltdavis@hgd-oxford.com>, Swayze <salford@swayzealfordlaw.com>

First off the motion for conservatorship and request to execute will was on May 9th.

There are numerous sloppy spelling errors.

I ordered the transcript and will receive from Cecily soon as she gets it to me. I am going out of town next week.

I wish to have something more specific to what in the rules the subpoena violated. I had stated numerous times to Dr. Perkins, Swayze and the court that I was more than willing to go to Dr. Perkin's local. He just would not cooperate in allowing me to conduct the deposition at a place of his choosing, so that reason is not valid. I was more than willing to pay Dr. Perkins per the terms he testified on May 9th. That would have been reasonable per any rule there is to paying expert witnesses. I am a former CPA. I have done budget consulting work for two of the largest healthcare systems in US. No where in the US does a Psychiatrist get paid \$600, especially in Mississippi. So, that is not a rule violation. None of those were why the motion was quashed. Go back and read the transcript, and come up with something legitimate.

Also, I wish to have some documentation as to if the Perkins is rule 26 or 35 witness. Hale claimed rule 26 witness, but quotes MRE 706, although incorrectly, which pertains to rule 35 witnesses. Seems that was the issue that was argued 26 vs 35. Think something about that should be in the order. I will read transcript and propose some language.

Since we are getting in the order facts about two prior motions in this order, then lets put in this order that there were 3, which by the way is more than 2, attorneys arguing one side.

Hale, if you have an issue with correcting the sloppy, careless spelling, getting dates correct, getting a real substantive violation of MRCP, then I propose a conference with the Judge, and after I read the transcript and get back in town.

Hope everybody has a great day.

Robert Sullivant, Jr.

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>

Thu, Aug 31, 2023 at 12:02 PM

To: robert@steelandbarn.com

Address not found



Your message wasn't delivered to **waltdavis@hgd-oxford.com** because the domain [hgd-oxford.com](https://www.hgd-oxford.com) couldn't be found. Check for typos or unnecessary spaces and try again.

[LEARN MORE](#)

The response was:

DNS Error: DNS type 'mx' lookup of [hgd-oxford.com](https://www.hgd-oxford.com) responded with code NXDOMAIN Domain name not found: [hgd-oxford.com](https://www.hgd-oxford.com) Learn more at <https://support.google.com/mail/?p=BadRcptDomain>

Final-Recipient: rfc822; waltdavis@hgd-oxford.com

Action: failed

Status: 5.1.2

Diagnostic-Code: smtp; DNS Error: DNS type 'mx' lookup of [hgd-oxford.com](https://www.hgd-oxford.com) responded with code NXDOMAIN Domain name not found: [hgd-oxford.com](https://www.hgd-oxford.com) Learn more at <https://support.google.com/mail/?p=BadRcptDomain>

Last-Attempt-Date: Thu, 31 Aug 2023 10:02:24 -0700 (PDT)

----- Forwarded message -----

From: Robert Sullivant <robert@steelandbarn.com>

To: Hale Freeland <hale@freelandmartz.com>

Cc: Samantha Weathersbee <SWeathersbee@lafayettecoms.com>, Walt <waltdavis@hgd-oxford.com>, Swayze <salford@swayzealfordlaw.com>

Bcc:

Date: Thu, 31 Aug 2023 12:02:15 -0500

Subject: Re: Sullivant Order

----- Message truncated -----

Samantha Weathersbee <SWeathersbee@lafayettecoms.com>

Thu, Aug 31, 2023 at 1:19 PM

To: Robert Sullivant <robert@steelandbarn.com>

Cc: Hale Freeland <hale@freelandmartz.com>, Walt <waltdavis@hgd-oxford.com>, Swayze <salford@swayzealfordlaw.com>

I made the spelling & grammar edits. The order has been signed & filed by Judge Whitwell today.

Mr. Sullivant, you can get a copy of it off of MEC or from the clerk. If you feel something was done in error as to this Order, you need to file something, & have it set. It will need to be set on a regular setting day with a court reporter so a telephonic hearing is out. Judge Whitwell wants a record of all matters in this cause. I understand your confusion, but again, you are held to the same standard a lawyer is & have to adhere to the rules & law. The court nor the attorneys that represent other sides from you can give you advice/guidance/clarification.

Further, many sides are represented in this matter. There is SR., JR., Dr. Perkins, Ms. Evelyn, & the conservator. Each side is entitled to representation. A side does not equal two as you have inferred. Like this suit, a pentagon has five sides & each 5 side/party is entitled to representation.

Best,

Samantha Weathersbee
Staff Attorney to Judge Whitwell

Sent from my iPhone

On Aug 31, 2023, at 12:02 PM, Robert Sullivant <robert@steelandbarn.com> wrote:

[Quoted text hidden]

Samantha Weathersbee <SWeathersbee@lafayettecoms.com>

Thu, Aug 31, 2023 at 1:25 PM

To: Hale Freeland <hale@freelandmartz.com>, "waltdavis@dunbardavis.com" <waltdavis@dunbardavis.com>

Cc: "Robert Sullivant, Jr" <robert@steelandbarn.com>, Swayze <salford@swayzealfordlaw.com>

I am resending the correspondence with the Court and parties so that Walt is included. I think a wrong email for him was added.

[Quoted text hidden]

Samantha Weathersbee <SWeathersbee@lafayettecoms.com>

Thu, Aug 31, 2023 at 1:25 PM

To: Robert Sullivant <robert@steelandbarn.com>, Hale Freeland <hale@freelandmartz.com>

Cc: "waltdavis@dunbardavis.com" <waltdavis@dunbardavis.com>, Swayze <salford@swayzealfordlaw.com>

From: Robert Sullivant <robert@steelandbarn.com>

Sent: Thursday, August 31, 2023 12:02 PM

To: Hale Freeland <hale@freelandmartz.com>

Cc: Samantha Weathersbee <SWeathersbee@lafayettecoms.com>; Walt <waltdavis@hgd-oxford.com>; Swayze <salford@swayzealfordlaw.com>

Subject: Re: Sullivant Order

First off the motion for conservatorship and request to execute will was on May 9th.

[Quoted text hidden]

[Quoted text hidden]

Samantha Weathersbee <SWeathersbee@lafayettecoms.com>

Thu, Aug 31, 2023 at 1:25 PM

To: Robert Sullivant <robert@steelandbarn.com>

Cc: Hale Freeland <hale@freelandmartz.com>, "waltdavis@dunbardavis.com" <waltdavis@dunbardavis.com>, Swayze <salford@swayzealfordlaw.com>

From: Samantha Weathersbee

Sent: Thursday, August 31, 2023 1:20 PM

To: Robert Sullivant <robert@steelandbarn.com>

Cc: Hale Freeland <hale@freelandmartz.com>; Walt <waltdavis@hgd-oxford.com>; Swayze <salford@swayzealfordlaw.com>

Subject: Re: Sullivant Order

I made the spelling & grammar edits. The order has been signed & filed by Judge Whitwell today.

[Quoted text hidden]