

22ND JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. TAMMANY

STATE OF LOUISIANA

NO: 2005-30245

DIVISION: "D"

SUCCESSIONS OF DAISY LEE MORRIS WIFE OF/AND
LEVI MORRIS

FILED: _____

DEPUTY CLERK

MEMORANDUM IN OPPOSITION
TO MOTION TO REMOVE ADMINISTRATOR

Evangelio Morris, duly appointed Executor ("Vann") responds to the *Motion and Incorporated Memorandum To Remove Administrator, To Place Succession Property Into Registry of the Court, To Appoint Administratrix of Of Successions And To Appoint Curator For Unrepresented/Absentee Heirs*, filed on 17 March 2022 ("New Removal Motion") by Levi Morris, Daisy Morris Carter, Learinza Morris, and Virginia Morris Briggs (collectively sometimes "Learinza"). On 6 April 2022, Vann filed an initial response to the New Removal Motion, entitled *Motion To Schedule Hearing, To Approve Tableau of Distribution of Funds To Heirs, And Objection To Appointment For Curator*. This memorandum is intended to supplement that prior filing.

In Learinza's New Removal Motion, he basically rehashes the same topics addressed by this Court through a full evidentiary hearing on 23 June 2021, but Learinza also now complains that Vann improperly sold the immovable property owned by the Succession, in violation of Louisiana law and without Vann communicating beforehand with his many siblings and relatives. In making this complaint, Learinza does not accurately reference Louisiana's well-established statutory process for the sale of succession owned immovable property, nor does Learinza share with this Court the many communications Vann or the undersigned shared with Learinza and the entire Morris family after the June 2021 hearing. The sale of the Succession's immovable property occurred in strict adherence to Louisiana law, and Vann and the undersigned counsel communicated with the many Morris heirs, including Learinza and his counsel, throughout and then after the process. Learinza only complained about the sale or valuation of the property, in March 2022, well after the sale was concluded and well after Vann initiated the formal process to distribute the proceeds from the sale.

As previously emphasized to this Court, the eight acres of property was purchased by Daisy and Levi Morris, the decedents, in the early 1950s, during times of segregation, when it was extraordinary and difficult for African-Americans to purchase real estate, particularly in South Louisiana. Vann, joined by most of his siblings¹ (the “Morris Siblings Desiring Resolution”), have desired to maintain the property, not only to continue to hold in the Morris family name, but also to allow that all Morris Family members will have a place to live, if circumstances are such that any family member finds himself or herself in need. The Morris Siblings Desiring Resolution were of the belief that Learinza shared their sense of pride and admiration for their family’s heritage, as well as their desire to care for each other and to ensure a residence for any family member in need. As such, the Morris Siblings Desiring Resolution are disappointed that Learinza has continued with his false accusations.

Furthermore, Vann (and his sibling Mary, who purchased the succession property) have always maintained and offered, if any sibling wants to purchase a portion of the family property but will commit to allowing any Morris family members in need to remain on the property, that sibling – including Learinza Morris, Daisy Morris Carter, Virginia Morris Briggs, and Levi Morris – simply needs to contact Mary to make the appropriate arrangements. The price will remain fixed at an amount equal to whatever Mary paid the Succession to purchase the property. Regardless of the conduct and the false accusations that have been leveled by the four siblings who brought the New Removal Motion, Mary intends to always make the family property available to any Morris family member to use, whether that family members wants to purchase a portion of the property from her by reimbursing her at a price equal to what she paid the succession for the property, or if that family member simply is in need and needs to use the property as a place to reside at no charge.

As far as the contention that Vann did not comply with Louisiana’s formal succession procedures before he alienated the immovable property, the record of this proceeding proves otherwise. Vann filed the petition required by La. CCP art. 3281 on 21 June 2021, but asked for the publication process to be withheld, until after the June 2021 hearing could take place. After the

¹(1) Vann was formally joined by the following 9 relatives who have an interest in this estate, who are Vann’s siblings, nieces or nephews: (2) Mary Morris Perry; (3) Sammie Morris, (4) Leander Morris Jr, (5) DeShawna Morris; (6) Leon Morris; (7) Sarah Morris Stormer, (8) Arquillia Morris (9) Mitchell Morris; (10) David Morris. An 11th relative, Lee Antoinette Morris has instructed Ms. Fox to include her as having joined Vann’s position on all topics before this Court.

June hearing, communications with Learinza occurred, through which it was concluded that Learinza did not intend to purchase the property or to offer a reasonable alternative to Mary purchasing the property. So Vann complied with the publication process in the St Tammany Farmer required by La. CCP. Art. 3282, with publications on 11 August 2021 and 1 September 2021. Thereafter, with no opposition filed by any heir, including Learinza, Vann obtained this Court's judgment on 15 October 2021, mandating the sale to take place as required by La. CCP. Art 3293. The sale was thereafter concluded on 9 November 2021.

Although Learinza was free to file the appropriate objections or opposition allowed by La. CCP art. 3283, he chose not to do so.² Learinza even acknowledges in his New Removal Motion the clear direction he received from this Court at the conclusion of the June hearing:

Again, if Mr. Morris goes forward or attempts to go forward with the sale of the property, then ya'll need to file the appropriate documents to contest it, and I will hear at that time the testimony regarding why one person would be better off purchasing the property than another person.

Yet Learinza did not file the appropriate documents to contest the sale - he only voiced the complaints raised in his New Removal Motion some four months after the sale was concluded, which was some nine months after this Court's June 2021 hearing.

As far as the contention that Vann did not communicate with Morris family members before he alienated the immovable property, the exhibits attached as Exhibits 1 through 5 prove otherwise. These written communications, which Learinza chose not to share with this Court in his New Removal Motion, are detailed and self-explanatory. Even further, Vann maintains public websites for Morris family members,³ through which he reports Morris family happenings. Vann also regularly has group texts that include all Morris family members, through which he also shares news of Morris family happenings.

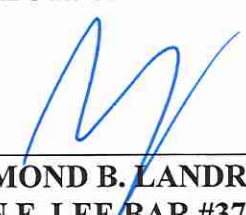
² Despite statements made by Learinza to the contrary, no requirement exists in Louisiana law to serve (or even notify) heirs with paperwork prior to the sale of immovable property. By way of distinction, if succession property had been involved in an exchange, then our Code of Procedure requires service on heirs or legatees. La. C.C.P. art. 3293. But again, no such service is required when succession property is sold.

³ www.evangelomorris.com/land, www.Evangelomorris.com/admin and www.evangelomorris.smugmug.com

Even further, the petition to cause the sale of the immovable property to Mary was filed prior to the June hearing and the purchase agreement that led to the sale of the immovable property was discussed in great detail at the June hearing. As such, Learinza cannot reasonably report to this Court that he had no notice of the potential sale of the succession property to Mary.

WHEREFORE, Evangelo Morris, duly appointed Executor, moves this Court to authorize, approve, and homologate the tableau of distribution submitted by the Morris Siblings Desiring Resolution.

RESPECTFULLY SUBMITTED,



RAYMOND B. LANDRY, BAR #21696
JOHN F. LEE BAR #37203
MOLLERE, FLANAGAN & LANDRY, L.L.C.
2341 Metairie Road
Metairie, Louisiana 70001
(504) 837-4950
RBL@MollereFlanagan.com
JFL@MollereFlanagan.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon all counsel of record by email this 19th day of May 2022.

ATTACHMENT 1

LETTER OF 30 JUNE 2021, FOLLOWING THE HEARING IN JUNE 2021

MOLLERE, FLANAGAN & LANDRY, L.L.C.

ATTORNEYS AND COUNSELLORS AT LAW
MOLLERE BUILDING
2341 METAIRIE ROAD
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RBL@MollereFlanagan.com

Jules G. Mollere (1921-1985)
James T. Flanagan (1928-2006)

30 June 2021

John Toerner
19335 N 9th Avenue
Covington, LA 70433

RE: Successions of Daisy Lee Morris Wife or/and Levi Morris
MF&L File No.: S-1774

Dear John:

While I do need to note that my clients disagreed with many of the statements, including statements purporting to be facts, made by your clients when they took the stand under oath last week, I am hopeful that these topics will not need to be revisited.

Also, although the Court encouraged the input of all Morris family members related to the sale of the Folsom Property, I can report that Vann, Mary or I had obtained the input of all Morris family members prior to entering the courtroom last week, *other than* the input of your clients, Virginia Briggs and Learinza Morris, and of Daisy Carter and Levi Timothy Morris. On the evening of the hearing, both Daisy Carter and Levi Timothy Morris were contacted, both of whom indicated disappointment that this family concern was brought before a court and both of whom expressed their support for allowing Mary to purchase the property for the appraised value.

I believe you told me that Virginia was not interested in purchasing or contributing to the purchase of the property. But I also was told that neither of your clients expected Sarah or Leon to pay rent related to their trailers being located on the property, and you argued to the Court otherwise, I believe indicating that Vann should have collected more than \$90,000 from his two siblings who live on the property in trailers. I also heard in your argument that the value of the appraisal was inaccurate because it did not take into account the value of structures or trailers located on the property. My clients and their family members with whom I have now communicated are not aware of any structures located on the property, each are resolute in their belief that Sarah owns her trailer and Leon owns his trailer, and each report to me that no family member has ever expected Vann to collect rent from Sarah or Leon or any other family member residing on the property. I also wonder what value reasonably would be attributable to trailers acquired in the 1980s (or earlier).

I mention all of this, mainly because I am unclear about your two clients' position about Mary's proposed purchase of the property. I am familiar with Louisiana's succession procedure for formal

administration, but I would prefer to focus on substantive concerns, as very quickly attorney fees can be tallied that would exceed the value of the property at issue, and I would much prefer that each family member, including yours, receive as much as possible from the sale of the property, rather than the proceeds going to lawyers, the clerk of court, and the local newspaper. I realize that strictly following the procedure of the La. C.C.P. arts. 3281-3284, your clients could require the publication notices to be filed and then cause a contradictory hearing to be scheduled to challenge the sale of the property to Mary, but I would prefer not to experience the expense and delays of publication, simply to later have a hearing for the Court to determine whether Mary can purchase the property for the full appraised price, which could result in further delays and further publication expenses.

So I am asking you to please provide me with clear, written responses to the following questions, if possible, no later than next Tuesday, 6 July 2021. If this time request is not reasonable or convenient, please just let me know the date by which you can provide these responses. I am not trying to place any unreasonable burden on you or your clients, but instead I am striving to move this succession to closing, as peacefully and inexpensively as possible:

- 1) Do your clients intend to bring an action against Vann, seeking damages for his failure to insist on rent being paid by the siblings who have lived on the property after 2005? If so, I will set this topic for a contradictory, evidentiary hearing at this time.
- 2) Do either of your clients still intend to challenge Mary's purchase of the Folsom Property for the full appraised value? If so, please state the reason for this challenge and your clients' proposal for how the Folsom Property should be alienated, in a fashion that will allow for the Successions to be closed within the next 60 days?
- 3) Assuming Virginia Briggs and Learinza Morris do intend to challenge Mary's purchase of the Folsom Property, it is my understanding that all other family members support and appreciate Mary's willingness to purchase the Folsom Property, allow for the succession to be closed, and to then make arrangements to allow any family member to reside on the property at no charge or to purchase into the ownership of the property. If you or your clients are aware of any other family member who does intend to challenge Mary's purchase of the Folsom Property for the full appraised value, I ask that you please let me know, so that I can personally contact that family member to receive clear direction from that family member, as the information I'm receiving may be inaccurate.

Best regards.

Yours very truly,

MOLLERE, FLANAGAN & LANDRY, L.L.C.

By: _____

RAYMOND B. LANDRY

RBL:sd

cc: Vann Morris/Mary Perry

ATTACHMENT 2

EMAILS BETWEEN VANN'S COUNSEL AND COUNSEL FOR LEARINZA MORRIS AND VIRGINIA BRIGGS, EXTENDING BETWEEN 2 JULY 2021 AND 6 JULY 2021.

Raymond Landry

Subject:

From: Raymond Landry
Sent: Tuesday, July 6, 2021 1:01 PM
To: John Toerner <toernerlaw@gmail.com>
Subject: RE: Succession of Morris

John, thank you for your email. Because of the current adversarial posture of this succession administration, Vann would feel more comfortable with everything going through the lawyers until the succession administration is concluded. Once the succession administration is concluded, Vann will be glad to resume the familial relationship with Learinza and Virginia, freed of the current unpleasantness.

As I explained in court filings (and which I understand to be understood by all family members), Vann received zero funds or assets when he accepted his appointment as succession representative, other than the 8 acres at issue. Any expenses related to the administration of the estate, he has paid from his own pocket, and received some reimbursement from others. As such, Vann has no accounting that he can provide for the succession, as the starting balance was zero. I point out again that Vann is not seeking reimbursement from the amounts he is currently out of pocket, other than the expenses incurred in 2021 after Virginia filed her petition in an attempt to have him removed as succession representative. Most of my firm's fees and expenses would have been generated in June, and those bills have not yet been run, but I will provide you with an invoice in due course.

I was under the impression that you needed until 23 July to speak with your clients and get back with me, but if the request is now to refrain from proceeding with the court until 23 July, I'll honor that request also. But I do remind you that we are in the current adversarial posture, only because of complaints from your client that Vann should have long ago ended the administration of this succession, which he is prepared to do and has immediately taken the steps to accomplish once Virginia (1 of 15 heirs) filed her complaints with the court. At this juncture, I believe your clients simply need to respond to the below inquiries, although I do note your report that Virginia does not want to purchase the property, so that does provide some input.

- 1) Do your clients intend to bring an action against Vann, seeking damages for his failure to insist on rent being paid by the siblings who have lived on the property after 2005? If so, I will set this topic for a contradictory, evidentiary hearing at this time.
- 2) Do either of your clients still intend to challenge Mary's purchase of the Folsom Property for the full appraised value? If so, please state the reason for this challenge and your clients' proposal for how the Folsom Property should be alienated, in a fashion that will allow for the Successions to be closed within the next 60 days?
- 3) Assuming Virginia Briggs and Learinza Morris do intend to challenge Mary's purchase of the Folsom Property, it is my understanding that all other family members support and appreciate Mary's willingness to purchase the Folsom Property, allow for the succession to be closed, and to then make arrangements to allow any family member to reside on the property at no charge or to purchase into the ownership of the property. If you or your clients are aware of any other family member who does intend to challenge Mary's purchase of the Folsom Property for the full appraised value, I ask that you please let me know, so that I can personally contact that family member to receive clear direction from that family member, as the information I'm receiving may be inaccurate and I want to be able to report to the court accurately.

I am glad to receive communication from Learinza or Virginia, but ask that it be in writing and that you are copied on any communication. As I intend to report directly to the Court by 24 July 2021, I do not want to inadvertently misrepresent anything to the Court, so it would be best that any communication from your client be in writing (i.e., email).

Raymond Landry
Mollere Flanagan & Landry, LLC
2341 Metairie Road
Metairie Louisiana 70001
(504) 837-4950

From: John Toerner <toernerlaw@gmail.com>
Sent: Monday, July 5, 2021 12:01 PM
To: Raymond Landry <rbl@moflan.com>
Cc: Virginia Briggs <virginia.briggs@yahoo.com>; Honey Love <Learinza@msn.com>; Learinza Morris <learinzamorris@ymail.com>; Shawna Morris <shawna.morris@comcast.net>
Subject: Re: Succession of Morris

Raymond,

I have spoken with Learinza Morris and Virginia Briggs today. In an effort to save attorney's fees, they would prefer to communicate with Vann directly if you would allow them to. If you would prefer not to allow Vann to communicate with them, then you may do so directly. I have carbon copied them on this email so that you will have their email addresses. Ms. Briggs phone number is 229-506-2760 and Mr. Morris can be reached at 707-712-3531.

They would still like you not to file anything regarding the sale of the property as we agreed until July 23, 2021. They would also request that an accounting for the succession be prepared which includes all of your attorney's fees that you have earned as of the date of the accounting.

Ms. Briggs has no interest in purchasing the property. Hopefully you can work things out with Mr. Morris regarding the sale of the property.

Please continue to serve me with all pleadings. Thanks.

John

On Fri, Jul 2, 2021 at 3:46 PM John Toerner <toernerlaw@gmail.com> wrote:

Thank you. Have a good 4th!

On Fri, Jul 2, 2021 at 3:10 PM Raymond Landry <rbl@moflan.com> wrote:

I may have already responded, but I am fine with this. Thanks for letting me know what to expect.

Raymond Landry
Mollere Flanagan & Landry, LLC
2341 Metairie Road

Metairie Louisiana 70001

4) 837-4950

From: John Toerner <toernerlaw@gmail.com>
Sent: Friday, July 2, 2021 9:17 AM
To: Raymond Landry <rbl@moflan.com>
Subject: Re: Succession of Morris

Hi Raymond,

Thanks for the letter. I have not been able to reach Mr. Morris yet to see how he wants to proceed. I think that I will need more time to discuss that matter with my clients and see how they want to proceed. Can you give me until July 23, 2021 to provide a response? Thanks.

John

On Wed, Jun 30, 2021 at 11:24 AM Raymond Landry <rbl@moflan.com> wrote:

Raymond Landry
Mollere Flanagan & Landry, LLC
2341 Metairie Road
Metairie Louisiana 70001
(504) 837-4950

-----Original Message-----

From: copier@moflan.com <copier@moflan.com>
Sent: Wednesday, June 30, 2021 10:49 AM
To: Raymond Landry <rbl@moflan.com>
Subject: Message from "RNP583879476AB6"

This E-mail was sent from "RNP583879476AB6" (MP 5055).

Scan Date: 06.30.2021 10:49:24 (-0500)
Queries to: copier@moflan.com

This e-mail, and any attachments thereto, is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail, you are hereby

ATTACHMENT 3

EMAILS BETWEEN VANN'S COUNSEL AND COUNSEL FOR LEARINZA MORRIS AND VIRGINIA BRIGGS, ON 27 JULY 2021.

Raymond Landry

Subject:

From: Raymond Landry
Sent: Tuesday, July 27, 2021 5:48 PM
To: John Toerner <toernerlaw@gmail.com>
Subject: RE: FW: Close Accounts-CatherineL. Beebe & Perry H Beebe

We did not file any pleadings, but the publication process was commenced yesterday, after the 23 July deadline passed without any responses to the questions I posed in the letter I sent after we had the hearing. I'll let you know the dates of publication in the Farmer, when I receive them.

Raymond Landry
Mollere Flanagan & Landry, LLC
2341 Metairie Road
Metairie Louisiana 70001
(504) 837-4950

From: John Toerner <toernerlaw@gmail.com>
Sent: Tuesday, July 27, 2021 5:47 PM
To: Raymond Landry <rbl@moflan.com>
Subject: Re: FW: Close Accounts-CatherineL. Beebe & Perry H Beebe

Raymond,

Please keep me informed of any pleadings that you file in the Morris matter and let me know when you plan to sell the property. Thanks.

John

ATTACHMENT 4

EMAILS BETWEEN VANN'S COUNSEL AND COUNSEL FOR LEARINZA MORRIS AND VIRGINIA BRIGGS, ON 29 JULY 2021.

Raymond Landry

Subject:

From: Raymond Landry
Sent: Thursday, July 29, 2021 9:23 AM
To: John Toerner <toernerlaw@gmail.com>
Subject: Re: Morris Estate

Ok. Please direct your client to only communicate with me through you.

Raymond Landry
Mollere, Flanagan & Landry, LLC
Sent from my iPhone

On Jul 29, 2021, at 9:21 AM, John Toerner <toernerlaw@gmail.com> wrote:

For your purposes, you should assume that I do unless you hear otherwise either from myself or Learinza. If you hear otherwise, please let me know. Thanks.

John

On Thu, Jul 29, 2021 at 8:35 AM Raymond Landry <rbl@moflan.com> wrote:

John, please confirm whether you continue to represent Learinza.

From: shawna.morris@comcast.net <shawna.morris@comcast.net>
Sent: Wednesday, July 28, 2021 3:42 PM
To: Raymond Landry <rbl@moflan.com>; learinza@msn.com
Subject: Morris Estate

This e-mail, and any attachments thereto, is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender, and permanently delete the original and any copies or any printouts thereof. IRS Circular 230 Disclosure: Please be advised that any discussion of U.S. tax matters contained within this communication (including any attachments) is not intended or written to be used

ATTACHMENT 5

LETTER TO ALL HEIRS, DATED 24 JANUARY 2022

8-1774

MOLLERE, FLANAGAN & LANDRY, L.L.C.

ATTORNEYS AND COUNSELLORS AT LAW
MOLLERE BUILDING
2341 METAIRIE ROAD
METAIRIE, LOUISIANA 70001

Raymond B. Landry
Lisa M. Orlando
John F. Lee

Telephone: (504) 837-4950
Telecopier: (504) 837-3221
RBL@MollereFlanagan.com

Jules G. Mollere (1921-1985)
James T. Flanagan (1928-2006)

24 January 2022

To All Heirs of Daisy and Levi Morris:

Pursuant to the Judgment of the 22nd Judicial District Court, Mary Perry purchased the estate's immovable property in November 2021. I attach the settlement statement from that sale.

I also attach the paperwork that will finalize the succession entirely and will allow for the distribution to each of you of all sums being held in trust, pursuant to the accounting set forth on the Tableau Of Distribution. But please consider the next paragraph.

Ideally, this paperwork will be agreeable to each of you, and you will sign the document entitled **WAIVER AND RECEIPT OF LEGACY**, and I can then conclude the succession without anymore dissension and without your family being required to incur additional fees and costs. In fact, if everyone will agree to execute the paperwork and agree not to argue with each other any longer, I will reduce my firm's fee to a flat \$10,000, which I will honor regardless of the additional fees and costs that will need to be incurred. I will then adjust the paperwork to show that such an agreement has been reached and adjust the figures to show an additional \$1,000 to be split among all of you. If this is not acceptable to all of you - and the agreement must be unanimous - then I will be required to adhere to the appropriate, formal procedure, which will require publication in the St Tammany Farmer and another court appearance. So instead of being able to provide your family with a \$1,000 discount, the fees will likely increase at least another \$2,000, considering additional costs and fees. In other words, if all of you can agree now to allow this estate to be closed without further dissension, the overall savings to your family will be a total of about \$3,000, and the dollar amount you each will receive will be an extra \$72 above the amount shown on the accompanying paperwork (with Leander Morris Jr/LeeAntoinette Morris/DeShawna Morris sharing that amount 1/3rd each).

So please consider the attached, forward to me any questions you may have through email, and please let me know by Friday, 28 January, whether you are agreeable to waiving the formal process and will be signing the waiver document. I will then need to have verification papers signed by each of you in the presence of a notary and the papers delivered to me no later than 14 February 2022. Otherwise, I will have to withdraw my offer to provide your family with a discount and I will have to adhere to the formal, expensive process to finalize this succession. I really prefer to see all of you receive as much as possible as soon as possible, rather than paying additional fees and costs to the newspaper, clerk of court and my firm.

Please also note the Judgment of the 22nd Judicial District Court, whereby the Court recognized that Learinza and Virginia owe sums to their former lawyer, and the Court has ordered that the amount due Mr. Toerner be deducted from any inheritance sums to which Learinza and Virginia are entitled to receive from the estate. This Court ordered requirement is shown on the attached paperwork also.

So if you intend to cooperate and agree to the conclusion of the estate at this time:

- 1) Print attached WAIVER AND RECEIPT OF LEGACY;
- 2) Handwrite your name in both places where blank lines appear, each of you need to sign your own document and you will be the "Apparer" in your own document;
- 3) Then appear before a Notary and two witnesses, and sign your name then. (If you are in the Greater New Orleans' area, you are invited to appear at my office to accomplish this task, and there will be no charge for this notarization);
- 4) Return the original wet-ink signature to me no later than 14 February 2022.

Please let me hear from you, mindful of the deadlines I am providing herein. Again, to proceed informally and most inexpensively and quickly, I will need to receive the fully executed Waivers back from each of you. If even one refuses, which would be that person's right, I will proceed through the formal, more expensive process. The result will be the same regardless, it will simply cost the family a projected additional cost of \$3,000.

Yours very truly,

MOLLERE, FLANAGAN & LANDRY, L.L.C.

By: _____

RAYMOND B. LANDRY

RBL:sd

Enclosure

cc: Evangelo Morris