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**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