

CLERK OF THE COURT
TABATHA FERGUSON
BOSQUE COUNTY CLERK
MERIDIAN, TEXAS

ATTORNEY FILING
JEROME A. STYRSKY
1205 N. MAIN STREET
FORT WORTH, TX 76164

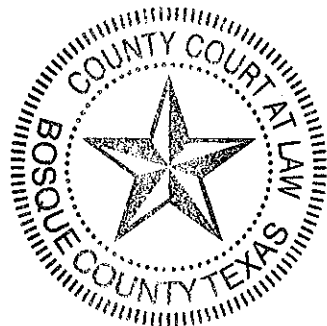
THE STATE OF TEXAS

TO ALL PERSONS INTERESTED IN THE ESTATE OF **JOHN GOODSON**, deceased, Docket No. **P08417** County Court at Law Bosque County, Texas, **MARK TROTTER** filed in the County Court at Law of Bosque County, Texas, on the **26th day of AUGUST, 2021** an **APPLICATION FOR PROBATE OF WILL AND ISSUANCE OF LETTERS TESTAMENTARY**. Said application will be heard and acted on by said Court **no earlier than 10:00 am** on the **first Monday** next after the expiration of ten days, from the date of posting this citation, the same being the **13th DAY OF SEPTEMBER, 2021** at the County Courthouse in **MERIDIAN, TEXAS**.

All persons interested in said estate are hereby cited to appear before said Honorable Court at said above mentioned time and place by filing a written answer contesting such application should they desire to do so.

The officer executing this citation shall post the copy of the citation at the Courthouse Door of the county in which proceedings are pending, or at the place in or near said Courthouse where public notices customarily are posted, for not less than 10 days before the return day thereof, exclusive of the date of posting and return the original copy of this citation to the Clerk stating in a written return thereon the time when and the place where he posted such copy.

GIVEN UNDER MY HAND AND THE SEAL OF SAID COURT in Meridian, Texas. This the **27th day of AUGUST, 2021**.



Tabatha Ferguson

TABATHA FERGUSON
Bosque County Clerk

Melissa Grahl

Deputy

OFFICER'S RETURN ON CITATION

Came to hand on the 27 day of Aug, 2021, at
9:21 o'clock A M. and executed on the 27 day of Aug, 2021
by posting a copy of the within citation for ten days, exclusive of the day of posting,
before the return day hereof, at the County Courthouse door of Bosque County,
Texas, or at the place in or near the said courthouse where public notices customarily are
posted, that is from 8/27, 2021, through 9/13,
2021, inclusive.



CONSTABLE
BOSQUE COUNTY, TEXAS

Printed name: Scott Ferguson

NO. _____

ESTATE OF	§	IN THE COUNTY COURT
	§	
JOHN BRETT GOODSON,	§	AT LAW OF
	§	
DECEASED	§	BOSQUE COUNTY, TEXAS

**APPLICATION FOR PROBATE OF WILL
AND ISSUANCE OF LETTERS TESTAMENTARY**

TO THE HONORABLE JUDGE OF SAID COURT:

Mark Trotter (“Applicant”), furnish the following information to the Court for the probate of the written Will of John Brett Goodson, (“Decedent”), and for issuance of Letters Testamentary to Applicant:

1. Applicant is an individual interested in this Estate, domiciled in and residing at 4530 S. 112TH West Avenue, Sand Springs, Oklahoma. The last three digits of Applicant’s social security number are 997, and the last three digits of Applicant’s drivers license are 719.

2. Decedent died on July 31, 2021, in Glen Rose, Somervell County, Texas, at the age of sixty-nine (69) years. The last three digits of Decedent’s Texas driver’s license number are 419. The last three digits of Decedent’s Social Security Number are 864.

3. This Court has jurisdiction and venue because Decedent was domiciled and had a fixed place of residence in this county on the date of death.

4. Decedent owned real and personal property of a probable value in excess of \$50,000.00.

5. Decedent left a valid written Will (“Will”) dated May 13, 2021, which was never revoked and is filed herewith. Applicant has been unable to locate the original Will so a true and correct copy of same has been filed with this Application. To the best of Applicant’s knowledge Decedent never revoked said Will and never intended to revoke said Will.

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AND ISSUANCE OF LETTERS TESTAMENTARY**

6. The subscribing witnesses to the Will are Marisol Hernandez and Sherry Holmes both of Stephenville, Erath County, Texas.

7. No child or children were born to or adopted by **Decedent** after the date of the Will.

8. After the date of **Decedent's** Will, no marriage of **Decedent** was dissolved.

9. A necessity exists for the administration of this Estate.

10. **Decedent's** Will named Jody Brett Goodson to serve without bon or other security as independent executor. Jody Brett Goodson is unable to serve as such and desires to waive his right to be so appointed, and by virtue thereof, Applicant, who was named to serve without bond or other security as alternate Independent Executor, should be appointed Independent Executor. **Applicant** would not be disqualified by law from serving as such or from accepting Letters Testamentary, and **Applicant** would be entitled to such Letters. The written waiver of the right of Jody Brett Goodson to be appointed as independent executor will be filed with the clerk of this Court.

11. Neither the State of Texas, a governmental agency of the State of Texas, nor charitable organization is named by the Will as a devisee.

12. In accordance with Texas Estates Code Section 256.054, the following information is provided:

a. The reason the Will cannot be produced is that **Applicant** believes that the original Will was misplaced or is in an inaccessible location after Decedent's death. **Applicant** believes that The original Will is located at **Decedent's** residence, but **Applicant** does not have access to the residence and the current occupant of the residence, **Decedent's** surviving spouse, has refused to deliver the Will. Despite diligent and reasonable efforts to locate the original, **Applicant** was only able to locate the copy that is filed herein for probate.

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b. The contents of the lost Will are identical to the photocopy of the Will filed with the Court.

c. The name, address, status, relationship to the Testator of each devisee and each person who would inherit as an heir in the absence of a valid will are:

- 1). Lori Goodson
Heir:
Adult surviving spouse with no incapacity
Address: 116 W. Greenland Street, Walnut Springs, Texas 76690
- 2). Jody Brett Goodson
Heir and Devisee:
Adult son with no incapacity
Address: 1611 CR 225, Hico, Texas 76457

13. **Applicant** believes that Lori Goodson is in possession of the original of **Decedent's** Will. **Applicant** has made demand on Lori Goodson to deliver said Will to the clerk of this Court pursuant to §252.201 of the Estates Code, but Lori Goodson has failed to make delivery. A true and correct copy of the demand letter is attached hereto as Exhibit A and is incorporated by reference herein. **Applicant** has received no response to the letter.

14. **Applicant** request this Court to conduct a show cause hearing and to then compel Lori Goodson to deliver the Will to the clerk of this Court. If Lori Goodson refuses to do so, **Applicant** requests that said person be arrested and jailed until she complies with this Court's order.

15. **Applicant** further requests that Lori Goodson be ordered to reimburse **Applicant** for all reasonable and necessary attorneys fees and expenses incurred herein to compel the production of the Will.

Applicant prays that citation issue as required by law to all persons interested in this Estate; that the Will be admitted to probate; that independent administration be granted; that Letters

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AND ISSUANCE OF LETTERS TESTAMENTARY

Testamentary be issued to **Applicant**; and that all other orders be entered as the Court may deem proper. **Applicant** further prays that a show cause order be issued and personally served on Lori Goodson; that this Court thereafter conduct a show cause hearing at the earliest possible date, that after hearing the Court order Lori Goodson to deliver the Will to the clerk of this Court; that Lori Goodson be ordered to pay all of **Applicant's** reasonable and necessary attorney's fees and expenses incurred in this proceeding; and that **Applicant** receive such other and further relief to which he may be entitled.

Respectfully submitted,

/S/ Jerome A. Styrsky

Jerome A. Styrsky
State Bar No. 19455600
1205 N. Main Street
Fort Worth, Texas 76164-9116
(817) 334-0061
Fax: (817) 877-1439
jstyrsky@sbcglobal.net

ATTORNEY FOR APPLICANT

AFFIDAVIT

STATE OF TEXAS

COUNTY OF TARRANT

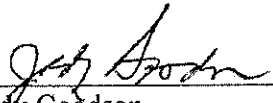
Before me, the undersigned authority personally appeared Jody Brett Goodson, who being by me duly sworn and said:

The Decedent, John Brett Goodson, is my father. On May 13, 2021, I took my father to the

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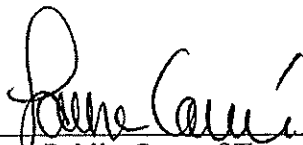
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office of his attorney in Stephenville, Texas, to execute his Will, a true and correct copy of which is attached to this Application. I drove my father back to his house at 116 W. Greenland Street, Walnut Springs, Texas, that same day and placed his Will in the safe located in his house. Lori Goodson is the current occupant of the house.

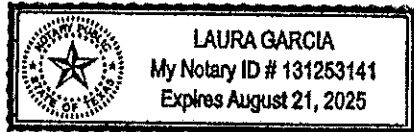


Jody Goodson

SUBSCRIBED AND SWORN TO BEFORE ME on the 25th day of
August, 2021.



Notary Public, State of Texas



**APPLICATION FOR PROBATE OF WILL
AND ISSUANCE OF LETTERS TESTAMENTARY**

JEROME A. STYRSKY

**ATTORNEY AT LAW
1205 N. MAIN STREET
FT. WORTH, TEXAS 76164
(817) 334-0061
FAX (817) 877-1439
jstyrsky@sbcglobal.net**

August 19, 2021

Lori Goodson
116 W. Greenland St.
Walnut Springs, Texas 76690

RE: The Estate of John Brett Goodson, Deceased

Dear Ms. Goodson:

I represent Mark Trotter who has retained me in connection with the estate of John Brett Goodson. We are trying to locate the original copy of his Last Will and Testament.

If you have custody of Mr. Goodson's will you are required under Texas Estates Code section 252.201 to promptly deliver it to the clerk of the Bosque County Court, located at 110 South Main, Room 110, Meridian, Texas, 76665. If you deliver the will to the clerk, please let me know that you have done so.

Please be aware that if you have custody of Mr. Goodson's will and you do not deliver it to the clerk of the county court you may be ordered by a court to appear and show cause why you should not do so.

I trust you will give this matter your immediate attention.

Sincerely,

/s/ Jerome A. Styrsky
Jerome A. Styrsky

JAS:sc

cc: client

EXHIBIT A