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BOSQUE COUNTY CLERK
MERIDIAN, TEXAS 76665

ATTORNEY FILING
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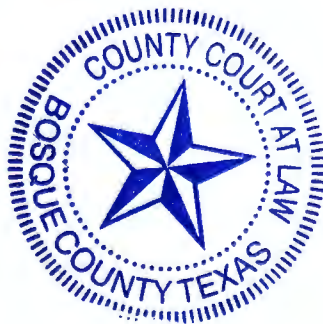
THE STATE OF TEXAS

TO ALL PERSONS INTERESTED IN THE ESTATE OF **GEORGE WESLEY CRUMP**, deceased, Docket No. **P08614** County Court at Law Bosque County, Texas, **JEANIE EVELYN HARRELL CRUMP** filed in the County Court at Law of Bosque County, Texas, on the **27th day of October, 2023** 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 November, 2023** at the County Court at Law Judicial Annex 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 October, 2023**.



Tabatha Ferguson
TABATHA FERGUSON
Bosque County Clerk

Wendy Croze
Deputy

OFFICER'S RETURN ON CITATION

Came to hand on the 30 day of OCT, 2023, at
11:43 o'clock A M. and executed on the 30 day of OCT, 2023
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 10/30, 2023, through 11/13,
2023, inclusive.


CONSTABLE
BOSQUE COUNTY, TEXAS

Printed name: Scott Ferguson

Bosque County - County Court at Law

No. P08614

IN THE ESTATE OF	§	IN THE COUNTY COURT
GEORGE WESLEY CRUMP,	§	AT LAW OF
DECEASED	§	BOSQUE COUNTY, TEXAS

APPLICATION TO PROBATE WILL AND FOR ISSUANCE OF LETTERS OF
INDEPENDENT ADMINISTRATION WITH WILL ANNEXED PURSUANT TO SECTION
301.002(b)(1) and 401.002(b) OF THE TEXAS ESTATES CODE

Comes now, Jeanie Evelyn Harrell Crump ("Applicant"), and furnishes the following information to the Court in support of this Application to Probate Will and for Issuance of Letters of Independent Administration with Will Annexed for the Estate of George Wesley Crump, Deceased ("Decedent"), pursuant to Sections 301.002(b)(1) and 401.002(b), of the Texas Estates Code:

1. Applicant is a resident of the state of Texas and is interested in this matter as the Decedent's surviving spouse and resides at 452 County Road 3320, Valley Mills, Texas 76689. Applicant may be served with process through her attorneys of record, Ford + Bergner LLP, at 901 Main Street, 33rd Floor, Dallas, Texas 75202. The last three digits of Applicant's Texas Driver's License number are 720 and the last three digits of her Social Security number are 614.

2. Applicant seeks to be appointed as Independent Administrator with Will Annexed over the Estate of George Wesley Crump, Deceased and is qualified to serve in that capacity.

3. Decedent died on November 3, 2006, in Bosque County, Texas, at the age of 59 years. The last three digits of Decedent's Texas Driver's License were 756. The last three digits of Decedent's Social Security number were 773. Decedent resided at 452 County Road 3320, Valley Mills, Texas 76689 at the time of his death.

4. This Court has jurisdiction and venue because Decedent was domiciled in and had a fixed place of residence in Bosque County, Texas at the time of his death.

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

6. Decedent left a valid written Will dated August 24, 2005 (the "Will"), which was never revoked and is filed herewith. The subscribing witnesses to the execution of the Will were Leona McKain and Diane Dyess. The Will was made self-proved under the terms of the Texas Estates Code.

7. Decedent was married once during his lifetime. Decedent married Applicant on August 13, 1977 and he remained married to her until his death. No marriage of Decedent was dissolved by divorce or annulment after the making of this Will.

8. Decedent and Applicant had no children during their marriage. No child was born to or adopted by Decedent after the making of this Will.

9. Applicant is qualified to serve as Independent Administrator with Will Annexed and is not disqualified by law from accepting Letters of Independent Administration with Will Annexed. Applicant, as primary distributee under the Will,

requests that she be appointed to serve without bond, pursuant to Section 401.005 under the Texas Estates Code.

10. Neither the State, a government agency of the State, nor a charitable organization is named by the Will as a devisee.

11. A necessity exists for the administration of this Estate, namely, to collect property owed to the Estate and to distribute same in accordance with the terms of Decedent's Will pursuant to Texas Estates Code Section 301.002(b)(1).

12. Applicant is filing this Application more than four years after the date of Decedent's death. Ordinarily, a will may not be admitted to probate after the fourth anniversary of the testator's death unless it is shown by proof that the applicant for the probate of the will was not in default in failing to present the will for probate on or before the fourth anniversary of the testator's death. *Tex. Est. Code § 256.003(a)*. The statutory standard for permitting or disallowing probate of a will after four years is "whether there is proof that 'the applicant for the probate of the will was not in default.'" *Ferreira v. Butler*, 575 S.W.3d 331, 337 (Tex. 2019) (citing *Tex. Est. Code § 256.003(a)*) (emphasis in original).

Applicant is not in default for failing to present the Will within four years of Decedent's death. Although more than four years have elapsed since Decedent's passing, due to the nature and extent of Decedent and Applicant's assets at the time of Decedent's passing, Applicant was advised by legal counsel that there was no need to probate Decedent's Will. Applicant only recently became aware of the existence of Decedent's survivorship claim based on exposure to polluted water at Camp Lejeune. Thus, a necessity now exists to probate Decedent's the Last Will and Testament to receive

or recover property due to Decedent's Estate, pursuant to Section 301.002(b)(1) of the Texas Estates Code.

12. In the event of intestacy, Decedent's Estate would pass pursuant to the laws of descent and distribution to the following individuals:

<u>Name and Address</u>	<u>Relationship</u>	<u>Age</u>
Alice Gail Crump Lowry 1008 Avenue D Ballinger, Texas 76821	Sister	Adult
Janet Isabel Crump Thomas Osburn 3500 Hali Road Big Spring, Teas 79720	Sister	Adult
Miriam Jean Pullin 903 8 th Street Ballinger, Texas 76821	Sister	Adult
Jeanie Evelyn Harrell Crump 452 County Road 3320 Valley Mills, Texas 76689	Surviving Spouse	Adult

13. All intestate heirs are expected to consent to the Probate of Decedent's Last Will and Testament and waiver service of same.

14. Applicant brings forth this Application in good faith and for just cause.

Prayer

Based on the foregoing, Applicant prays that: (i) citation be served and returned in the manner and for the length of time required by law; (ii) the Last Will and Testament of George Wesley Crump, Deceased, be admitted to probate; (iii) Applicant be appointed as the Independent Administrator with Will Annexed of Decedent's Estate, and

Letters of Independent Administration with Will Annexed be issued to that effect; and (iv) the Court enter all further Orders as it may deem proper.

Respectfully Submitted,

Ford + Bergner LLP



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