

STATE OF LOUISIANA * PARISH OF FRANKLIN
FIFTH JUDICIAL DISTRICT COURT

SUCCESSION OF
PEGGY MARIE McDOWELL TRAYLOR

FILED: _____

PROBATE DOCKET NO.: 41,291

DEPUTY CLERK OF COURT

SUPPLEMENTAL AND REPLY BRIEF

NOW INTO COURT, through undersigned counsel, comes Judge Chet Traylor, retired, who files this in response to the Administrators' Memorandum in Opposition to the pending Motion to Quash and in opposition to the Administrators' Motion to Turn Over.

Judge Traylor has now, out of an abundance of caution, filed his Initial Inventory and Proof of Claim which sets forth the known community debts. However, the Administrators continue to seek the financial records, both separate and joint, of Judge Traylor. As set forth in Judge Traylor's original motion and memorandum, Judge Traylor agrees that the heirs of Peggy Marie McDowell Traylor are entitled to one-half (½) interest in the community and are responsible for one-half (½) of the community debt. That debt has now been disclosed. It should also be pointed out that Judge Traylor has kept payments on the community debt current which forms a basis for his reimbursement claim. As such the Administrators are not in danger of having the community debt being placed in default or collection actions instituted. Judge Traylor has also agreed to allow the bank to disclose the existence of the amount of the community property held in the accounts.

Therefore Judge Traylor fears that the Administrators desire to have access to both his separate and joint accounts would be for a "fishing expedition". As the debts have clearly been identified and are not in default, Administrators' reasons for a complete review of Judge Traylor's personal finances are not well articulated or founded.

However, should the court be inclined to grant, in total or in part, the Administrators' request for financial information, either through their subpoena to Franklin State Bank records or the Turnover Motion, the undersigned respectfully prays that it be under the following conditions: Firstly, there be a third-party evaluation of the records to determine if there is any legitimate need or reason for the records to be disclosed. Judge Traylor represents herein he would bear the costs of such third-party inspection and preparation of a report. In the alternative,

