

IN THE MATTER OF THE ESTATE OF  
GEORGE PLOVANICH, DECEASED

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AMENDED COMPLAINT

~~42828~~  
4828

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE 28th JUDICIAL COURT OF BALDWIN COUNTY, ALABAMA:

Comes now Annie Plovanich and amends her Complaint which was heretofore filed in this cause in the Probate Court of Baldwin County, Alabama, and shows unto the Court as follows:

1.

That she is over the age of twenty-one years, a resident citizen of Perdido, Baldwin County, Alabama, and is a person interested in the Probate of the Last Will and Testament of George Plovanich, deceased, and that if the alleged testator, George Plovanich, had died intestate, the contestant would have been an heir and distributee of the estate of the said George Plovanich.

2.

The Contestant alleges that George Plovanich, at the time of the alleged will filed for probate was purported to be executed, was not of sound mind and disposing memory.

At the time the alleged will purports to be executed, the alleged testator, George Plovanich was incapable of making a Will, or to dispose of his property by a Will on account of enfeebled condition of the said George Plovanich, both in mind and body; that he had been in ill health for a long time and was so enfeebled, both in mind and body, as to be utterly incapable of making or executing a Will.

Contestant further alleges that at the time of the execution of the Will, the said George Plovanich was physically and mentally incapacitated to the point that he was incapable of exercising dominion over his affairs, and incapable of forming testamentary intent; that at the time of the execution of the alleged will, the said George Plovanich was under the dominion and control of the said Annie M. Sanders, and the said Annie M. Sanders procured a Will to be drawn in which she was chief beneficiary and by the exercise of undue influence had said will executed, knowing at said time that the said George Plovanich was incapable of forming and having a testamentary intent.

3.

Your Petitioner further avers that Annie M. Sanders was made the sole beneficiary under the Will now being contested, and that she is in no way related to George Plovanich, deceased.

4.

The Petitioner further avers that this matter originated in the Probate Court of Baldwin County, Alabama, and that your Petitioner made a demand in writing that this cause be transferred from the Probate Court to the Circuit Court in Baldwin County, Alabama, and that the issue be made and tried by a jury.

WHEREFORE, the premises considered, your Petitioner prays that Your Honor will by proper process make the said Annie M. Sanders respondent to this Bill of Complaint, requiring her to plead, answer or demur to the same with the time and under the penalties prescribed by law and the practice of this Honorable Court.

The Petitioner prays that on a final hearing of this cause, Your Honor will determine and declare that George Plavanich was of unsound mind at the time the above said Will was executed by him, and will declare the same invalid. The Petitioner further prays that Your Honor will grant her such other, further or general relief to which she may be entitled to receive.

Annie Plovanich

STATE OF ALABAMA

BALDWIN COUNTY

Before me, June B. Hedge, a Notary Public in and for said County and State, personally appeared Annie Plovanich, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows: That her name is Annie Plovanich, and the facts alleged in the foregoing are true and correct.

Annie Plovanich

Sworn to and subscribed before me

on this the 31<sup>st</sup> day of Aug., 1961.

June B. Hedge  
Notary Public

Witnessed Annie Plovanich's mark:

Gloria B. Plovanich  
June B. Hedge

FILED

SEP 5 1961

ALICE I. DUCK, CLERK  
REGISTER

IN THE MATTER OF THE ESTATE OF }  
GEORGE PLOVANICH, DECEASED }

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Come your petitioners, Antonic Mate, Mataija Kata nee  
Antonic and Jesic Ljuba nee Antonic, having notice of the petition  
by Annie M. Sanders to probate the will of George Plovanich, de-  
ceased show unto this Honorable Court as follows:

-1-

That Antonic Mate, Mataija Kata nee Antonic and Jesic  
Ljuba nee Antonic are children of Franka Antonic nee Plovanic,  
deceased, sister of the said George Plovanich, deceased, and are  
heirs at law and next of kin of said George Plovanich, deceased.

-2-

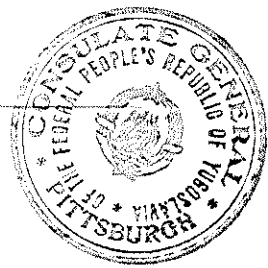
That your said petitioners join issue in the probate of  
the alleged will of George Plovanich, deceased.

-3-

That your petitioners deny the allegations of the said  
Annie Plovanich and show unto this Honorable Court that the said  
Annie Plovanich is not an heir at law of the said George Plovanich,  
deceased.

-4-

That your petitioners are heirs at law to the exclusion  
of the said Annie Plovanich.



For Petitioners  
Drago Novak  
Drago Novak, Consul of  
Yugoslavia for the  
territory of Alabama

FILED  
SEP 8 1961  
ALICE J. DUCK, CLERK  
REGISTER