

PLAINTIFF'S THIRD CAUSE OF ACTION

IX.

Plaintiff realleges and incorporates herein by reference each of the allegations contained in Paragraphs II through VIII above. The Farrys executed the documents attached as Exhibits "B" through "E" to this Petition only because the Pattersons exercised such dominion and control over their m. ls as to overcome their free agency and free will. Nelson Farry and Velma Farry would not have executed these documents but for the dominion and control exercised by the Pattersons. Plaintiff is therefore entitled to a judgment declaring the conveyances contained in these documents to be void.

PLAINTIFF'S FOURTH CAUSE OF ACTION

X.

Plaintiff realleges and incorporates herein by reference each of the allegations contained in Paragraphs II through IX above. There was no consideration for any of the conveyances contained in the documents attached hereto as Exhibits "B" through "E" and Plaintiff is therefore entitled to declaratory judgment that these conveyances are void for want of consideration.

PLAINTIFF'S FIFTH CAUSE OF ACTION

XI.

Plaintiff realleges and incorporates herein by reference each of the allegations contained in Paragraphs II through X above. The Farrys were Devout churchgoers for many years prior to Mr. Farry's death. During that time they had become intimate acquaintances with Paige and Dorothy Patterson, and so relied on Paige Patterson that he was named an executor of Mr. Farry's Will. The Pattersons therefore stood in a fiduciary and confidential relationship to the Farrys with respect to their affairs. The Pattersons, acting on behalf of the Criswell Center for Biblical Studies, took advantage of this fiduciary