

emotional strain created by the knowledge he had only a short time to live.

PLAINTIFF'S FIRST CAUSE OF ACTION

VII.

Plaintiffs reallege and incorporate herein by reference each of the allegations contained in Paragraphs II through VI above. At the time the Pattersons made misrepresentations alleged above, they knew them to be false, and were acting as agents for the Criswell Center for Biblical Studies in making them. These representations were material and were relied upon by the Farrys in executing the documents attached hereto as Exhibits "B" - "E", and the Farrys would not have executed the documents had these representations not been made. Therefore, Plaintiff is entitled to judgment declaring the documents attached hereto as Exhibits "B" - "E" void, and awarding damages sustained by her as a result of the fraudulent misrepresentations and conduct alleged, which damages Plaintiff allege to be in excess of the jurisdictional minimum of this Court.

PLAINTIFF'S SECOND CAUSE OF ACTION

VIII.

Plaintiff realleges and incorporates herein by reference each of the allegations contained in Paragraphs II through VII above. At the time the Farrys executed the documents attached as Exhibits "B" through "E" to this Petition, neither Mr. Farry nor Velma Farry had sufficient mind and memory to understand the nature and effect of the transaction in which they were engaged. Therefore, each of the conveyances contained in these documents is void, and Plaintiffs are entitled to declaratory judgment to this effect.