

LAST WILL AND TESTAMENT

OF

BODHISATTWA DAS

I, BODHISATTWA DAS, a resident and domiciliary of APPLING County, Georgia, being of sound mind and memory, and acting with my free will and not through duress or coercion from any person, create, verbally and by this instrument publish my Last Will and Testament. Furthermore, I hereby revoke all wills and codicils which I previously created.

Item I

Identification of Immediate Family

As of the execution of this Will, I am currently married to MMD. (my “wife”). I have (0) no children.

Item II

Payment of Debts and Distributions

(a) Payment of Debts. I direct that all of my due and payable debts (other than debts secured by mortgage on real property or by life insurance policies) and my funeral expenses be paid as soon as practicable after my death.

(b) Distributions. I give full and complete discretion to my Executor(s) and Trustee(s), as the case may be, on all distributions from the Estate or any Trust created in this Will, to make any distribution to any beneficiary into a bank or brokerage account of any Bank that has a principal place of business in the United States; also, the executor(s)/trustee(s) may make that such account be located in the United States.

Item III

Bequest of Tangible Personal Effects

I give and bequeath certain articles of my tangible personal property as provided in the last qualifying statement or list made for this purpose, which becomes qualifying *only if* such statement or list is: written, dated, signed by me, and attached to this my Last Will and Testament. In the event no separate qualifying writing is found within three months after the date of my death, it shall be conclusively presumed that no such writing exists. All of my household furniture, furnishings, books, pictures, art, jewelry, clothing, vehicles, and other tangible personal property (including any insurance thereon, but excluding money or property used in a trade or business) not disposed of pursuant to such separate and qualifying writing, I give and bequeath to my wife, if my wife survives me. If my wife does not survive me, then I give and bequeath such items of property to my children then living in equal shares, **per stirpes**, said shares to be determined by my Executor and distributed in kind or by distribution of the proceeds from the sale of said items. The reasonable costs of delivering all such property shall be paid by the Executor as an expense of my estate.

Item IV
Qualified Terminable Interest Property Trust

(a) *QTIP Trust*. If my wife survives me, then I give, bequest and devise all the rest and residue of my estate to this trust.

(b) *Income and Principal to Wife*. The Trustee shall hold, manage, invest such sum in TRUST, to pay the net income to my wife at least annually and may pay to my wife so much of the principal, whether the whole or a lesser amount, as my Trustee in his or her or their sole and complete discretion determines to be appropriate for my wife's accustomed manner of living. In exercising such discretion, my Trustee may but need not consider any other resources of my wife and shall give primary consideration to my wife's needs and desires.

(c) *Distribution on Wife's Death For Expenses*. Upon my wife's death, my Trustee shall pay this amount at such times as my wife's executor may in writing request as funds needed to pay the expenses of the Estate. The determination of my wife's executor as to the amount payable shall be conclusive upon all affected persons.

(d) *Distribution on Wife's Death*. Upon my wife's death, my Trustee shall distribute the remaining amount of this Trust Corpus to my then living children and my wife's then living children, in equal shares, one share for then living child, subject to the Descendant's Trust. *If any child has predeceased this distribution, then that child's share shall be distributed to that child's descendants, per stirpes. Should a child predecease this distribution and leave no issue, then that child's share shall be distributed to my then living children and my wife's then living children, in equal shares, one share for then living child. If any child has predeceased this distribution, then that child's share shall be distributed to that child's descendants, per stirpes.*

(e) *Wife's Limited Power of Appointment*. My wife shall have the power by instrument in death by her Last Will and Testament, making express reference to this power, to direct that any part or all of this trust be distributed to or for the benefit of any of my descendants or to or for the benefit of any organization that may receive transfers qualifying for the federal estate tax charitable deduction at the time of the exercise of the power, in such manner, in trust or otherwise, as my wife shall so direct, provided that in no event shall my wife have any power to appoint any of said property to himself, to her estate, to her creditors or to the

creditors of her estate.

Item V
Bequest and Devise of Residuary if My Husband Predeceases Me

Upon my death, if my wife has predeceased me, then I give, devise and bequeath the Residue of my Estate to the Trustee of the Descendant's Trust for the benefit of my issue in equal shares, per stirpes.

Item VI
Descendant's Trust

Property that is to be held in a Descendant's Trust shall be held under this Article and all references to a "Descendant's Trust" or the "Descendants' Trusts" shall be to the trust or trusts held under this Article. Each issue of mine in which a share is to be set aside on a per stirpital basis, shall be held in this trust in a separate share, and each such issue shall be known herein as a "Beneficiary" as follows.

(a) During the Beneficiary's Life. The following provisions shall apply during the Beneficiary's life: The Trustee shall distribute to one or more of the Beneficiary and the Beneficiary's descendants as much of the net income and principal of the trust as the Trustee may from time to time determine, in such amounts or proportions as the Trustee may from time to time select, for the recipient's health, education, maintenance and support in his or her accustomed manner of living. The Trustee shall have discretion to distribute to one or more of the Beneficiary and the Beneficiary's descendants as much of the net income and principal of the trust as the Trustee (excluding, however, any Interested Trustee) may from time to time determine, in such amounts or proportions as the Trustee (excluding, however, any Interested Trustee) may from time to time select for any purpose. Any net income not so distributed shall be accumulated and annually added to principal.

(b) Upon Beneficiary's Death. Upon the Beneficiary's death, the property then held in his or her trust shall be: distributed to such one or more persons (excluding the Beneficiary's estate, the Beneficiary's creditors, or the creditors of the Beneficiary's estate) on such terms as the Beneficiary may appoint by a will specifically referring to this power of appointment, or in default of appointment or insofar as an appointment is not effective;

set aside and divided into

per

stirpital

shares for the Beneficiary's descendants then living, or if there is no descendant of the Beneficiary then living and if the Beneficiary was a grandchild or more remote descendant of mine, for the descendants then living of the Beneficiary's nearest ancestor who was a descendant of mine, with descendants then living, or if there is no such descendant then living or if the Beneficiary was a child of mine, for my descendants then living, the share so set aside for a descendant to be distributed to the Trustee of a Descendant's Trust to be held as a separate trust and to be disposed of under the terms of the Descendants' Trusts under this Article, the descendant for whom the share is set aside to be the Beneficiary of his or her own Descendant's Trust.

(c) Disinterested Trustee May Confer Power. The Trustee (excluding, however, any Interested Trustee) may at any time, prior to the death of the Beneficiary, by an instrument in writing (1) confer upon the Beneficiary a power exercisable only by Will to appoint all or part of the trust to the creditors of the Beneficiary's estate (other than any taxing authority), and the instrument conferring power may require consent of the Trustee (other than any Interested Trustee) (2) revoke any such instrument previously executed, with or without executing a replacement instrument and/or (3) irrevocably relinquish the powers conferred under (1) and/or (2). Without limiting the Trustee's discretion, the Trustee may use the authority conferred by this paragraph to subject the trust property to estate tax instead of the generation-skipping transfer tax when it appears that it may reduce overall taxes to do so. The Beneficiary's power conferred by this paragraph shall not be exercisable in any manner so as to postpone the vesting of any estate or interest in the appointed property or to suspend the absolute ownership or power of alienation of the appointed property for a period ascertainable without regard to the date of my death, and the validity of any exercise shall be measured with respect to that date.

(d) Maximum Duration for Trusts.

Any trust under this Article still in existence upon the expiration of the Maximum Duration for Trusts as defined elsewhere in this Agreement shall thereupon terminate and the remaining trust property shall be distributed to the Beneficiary of the trust.

Item VI

Right of Beneficiary to Compel

During the administration of the Estate and in every Trust created hereunder, any income or corpus beneficiary of the estate has *the right to compel* the executor(s) of the estate and any income or corpus beneficiary of a trust has *the right to compel* the trustee(s) of that particular estate or trust *to reasonably invest* such in assets *to make those assets productive* so as to generate a *reasonable income*. However, this does not give any beneficiary any new rights to withdraw income or corpus other than what is put forth in this Will. Reasonable income shall be defined as generate the average rate of return of the average certificate of deposit among the banks in the state of Georgia for the period of time that the assets are being compelled.

Item VII

Payment of Taxes, Debts and Expenses

All transfer, estate, inheritance, succession and other death taxes which shall become payable by reason of my death, including the generation-skipping transfer tax on any direct skip created by the terms of this Will rather than by a disclaimer, but excluding any other generation-skipping transfer tax and also excluding any additional estate tax imposed pursuant to Section 2032A(c) of the Internal Revenue Code of 1986, as it may be amended, and all debts (including charitable pledges made by myself, my wife or my estate) and expenses of administration of my estate, whether in respect of property passing under this Will or otherwise, shall,

unless otherwise expressly provided elsewhere in this Will, be paid, without apportionment, from my residuary estate.

Item VIII

Common Disaster

In the event my wife and I should die under such circumstances wherein it cannot be determined as a matter of fact which of us survived the other, it shall be conclusively presumed that the one of the two of us that has the greater gross estate determined at the date of death shall be presumed to have predeceased the other.

Item IX

Appointment of Executor and Trustee

(a) Appointment of Executor and Trustee. I appoint my wife, MMD to be the personal representative of my estate. Should she be unwilling or unable to be the personal representative, then I appoint BODHISATTWA DAS, to be the next successor personal representative of my estate. If he is unable or unwilling to serve, then BODHISATTWA DAS , my sister, shall serve in his stead. If my wife has predeceased me, then I appoint BODHISATTWA DAS as the Guardians for any children of mine under the age of majority BODHISATTWA DAS are nominated as the next Guardians of my children, if BODHISATTWA DAS are unable or unwilling to serve.

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(b) Specific Duty of Successor Executors and Trustees. Each Successor executor or trustee shall have the express duty to appoint Successor successor(s) to himself, herself, or itself within 30 days of taking such office by unanimous decision of both of the then acting executors or trustees, as the case may be.

(c) General Resignation. Any Executor or Trustee acting hereunder shall have the right at any time to resign by written instrument delivered to the other Executor or Trustee acting hereunder, provided that in the case of an Executor such resignation shall also be delivered to the Beneficiaries of my Estate or Trust who are then sui juris. In the event there shall be no other Executor or Trustee acting, such resignation shall be delivered to the persons then entitled to the income from the estate or the trust.

(d) Replacement. In the event there should be no person acting as Executor of this Will or as Trustee of any trust created by this Will or any share thereof, a majority of the adult persons then entitled to the income from my estate, or such trust or share shall be entitled by written instrument to appoint a successor Executor or Trustee as to the estate or such trust or share.

Item X

Powers of Executor and Trustee

(a) Incorporation by Reference. In the management, care and disposition of my estate and of every trust, I confer upon the Executor of this Will and the Trustee of every trust created by this Will, and their successors in office, the power to do all things and execute such instruments as may be deemed necessary or proper, including the powers set out in Official Code of Georgia Annotated Section 53-12-261, as amended to the date of execution of this Will, which powers are incorporated by reference herein. All such powers may be exercised without order of or report to any court.

(b) Trust for Beneficiary under Age 21. Whenever the Executor or Trustee is directed to distribute any property in fee simple to a person who is then under twenty-one (21) years of age, the Trustee shall be authorized to hold such property interest for such person in trust until he or she becomes twenty-one (21) years of age, and in the meantime shall use such part of the income and the principal of the trust as the Trustee may deem necessary to provide for the proper support and education of such person. If such person should die before becoming twenty-one (21) years of age, the property then remaining in the trust shall be distributed, to the estate of such person.

(c) Distributions to Minors and Others under Legal Disability. In making distributions from my estate or any trust created hereunder to or for the benefit of any minor or other person under a legal disability, the Executor or Trustee does not need to have a guardian appointed, but shall be authorized to pay or deliver the same over to the custodian or previously appointed guardian of such person or to the custodian under the Georgia Uniform Transfers to Minors Act, or may keep, pay, or deliver the same to such person, without the intervention of a guardian if the Trustee deems it is not necessary as the case may be.

(d) Tax Elections. The Executor or Trustee shall be authorized to make any election permitted by any Federal or State tax law, including the filing of joint returns and the consenting to have gifts made by my wife treated as if made jointly by me, if in the opinion of the Executor or Trustee any such election is for the best interests of my estate and the beneficiaries thereof, and shall be authorized to make, or fail to make, such adjustment between the parties or the several bequests or accounts as the Executor or Trustee may deem fair under all the circumstances.

(e) Relief from Court Returns, Bond. The Executor or Trustee shall not be required to file any inventory, appraisal, any returns or reports to any court. The Executor or Trustee shall not be required to give bond at any time.

(f) Transactions between Related Entities. The Executor or the Trustee of any trust created by this Will shall be authorized to sell any property to or to purchase any property from any other trust created by this Will or created by me during life, or the estate of my wife or any trust created by my wife by will or during life at the fair market value thereof as determined by the Executor or Trustee, even though the same person or corporation may be acting as trustee of any such other trusts or as executor of my wife's estate and as the Executor or Trustee of the trusts hereunder.

(g) Division and Distribution in Kind. In the distribution of my estate and the division into separate trusts and shares, my Executor and Trustee may make the distribution and division in money, in kind, or in both, regardless of the basis for income tax purposes of any property distributed or divided in kind if the Executor

or Trustee has taken into account the tax liability of making such in money or in kind, and the distribution and division made and the values established by my Executor or Trustee shall be binding and conclusive on all persons taking hereunder. My Executor or Trustee may, in making such distribution or division, allot undivided interests in the same property to several trusts or shares.

(h) Allocation of Income and Expenses. The Executor or Trustee shall have discretion to determine whether items or portions of items should be charged or credited to income or principal or allocated between income and principal as the Executor or Trustee may deem equitable and fair under all the circumstances and in accordance with Georgia law.

(i) Division and Consolidation of Trusts. My Executor or the Trustee of any trust established by this Will may for tax, administrative or investment purposes divide any trust established hereunder, based upon the fair market values of the trust property at the time of division, into two or more separate trusts, the dispositive provisions of which, except as otherwise expressly provided herein, shall be identical to those applicable to the trust prior to division, and consolidate any trust established hereunder with any trust having substantially identical provisions for the same beneficiary or beneficiaries if such consolidation is consistent with my intent and does not defeat or impair a beneficial interest. Without limiting the generality of the foregoing, my Executor or Trustee may divide any trust into separate trusts consisting of portions that would, and would not, respectively, (i) be included in the gross estate of my wife or another beneficiary for federal estate tax purposes if such beneficiary died immediately prior to the division, or (ii) receive a step-up in cost basis of the assets in the trust for income tax purposes. My Executor or Trustee may also divide any transfer in trust provided for hereunder into fractional shares to which all, and none, respectively, of me or my wife's remaining generation skipping tax exemptions may be allocated, so as to create two separate trusts, the dispositive provisions of which, except as otherwise expressly provided herein, shall be identical to those which would have applied if such transfer had not been divided.

(j) Elimination of Small Trusts. My Trustee shall have the discretion to terminate or not establish any trust created or to be created under this will (other than a qualified charitable remainder trust) whenever the total fair market value of the assets of any such trust is so small that my Trustee's annual fee for administering the trust would be the minimum annual fee set forth in my Trustee's regularly published fee schedule then in effect, or whenever my Trustee determines it would be contrary to the best interests of the beneficiaries by reason of legislation or unforeseen changes or circumstances to create or continue such a trust, in which event the property then constituting or receivable by such trust shall be distributed to the beneficiaries then entitled to the income of such trust. If the beneficiaries of such income depend upon the exercise of my Trustee's discretion, then my Executor or Trustee, as the case may be, shall distribute such property among those beneficiaries and in such proportions as my Trustee, in its sole discretion, shall determine, and its determination shall be binding and conclusive upon all interested persons.

Item XI

Miscellaneous Provisions

(a) Number, Gender and Captions. References to "Executor," "Trustee," and "Guardian" hereunder, and any pronouns used in connection with same, shall be deemed to include masculine, feminine, or neuter forms, or singular or plural forms, in order to reflect the gender and number of the fiduciaries then serving. The captions or headings of the paragraphs or subparagraphs are inserted solely for the convenience of reference and shall not constitute a part of this Will, nor shall they affect its meaning, construction or effect.

(b) Adopted Descendants. Whenever the term "descendants" is used in this Will, such references shall be deemed to include any legally adopted child to the extent that they would include a natural born child of the adopting parent, except that they shall exclude any person whose adoption occurs after such person has reached the age of majority.

(c) Out-of-state Fiduciaries. Although I may have appointed fiduciaries to serve hereunder (as Executor, Trustee or Guardian) who may not be residents of the state of my residence at the date of my death, it is my specific request that they be allowed to serve in the positions designated, without bond.

(d) Rule Against Perpetuities. Anything in this Will to the contrary notwithstanding, all property of every trust created by this Will shall vest in and be distributed to the persons then entitled to the income from such property (or equally to the persons entitled to the income, if there is more than one beneficiary) at the expiration of ninety (90) years, if this Will is still in effect under the laws of Georgia, or if not then at the expiration of twenty-one (21) years after the death of the last surviving beneficiary of this Will who was in life at the date of my death, unless sooner vested as herein provided. The purpose of this provision is to prevent any possible violation of the rule against perpetuities this provision should be so construed.

(e) Applicable Law. The administration and construction of any trust created hereunder and the rights of the beneficiaries thereof shall be governed by the laws of the State of Georgia.

(f) In Terrorem Clause. Should any beneficiary contest or initiate proceedings to contest the validity of this Will or any provision herein or to prevent any provision herein from being carried out in accordance with its terms (whether or not in good faith and with probable cause), then all the benefits provided for such contesting beneficiary in this Will are revoked and annulled. Such benefits, if not a part of the residue of my estate, shall go over and become a part of the residue of my estate. If such contesting beneficiary is a beneficiary under any Item of this Will which disposes of the residue of my estate, such contesting beneficiary shall cease to be a member of the class of beneficiaries to whom distributions are required or permitted to be made under such item. Upon the final division and distribution of the property passing under such Item, the share to which such contesting beneficiary would otherwise have been entitled shall be held and distributed as if such contesting beneficiary had died immediately prior to such division without exercising any power of appointment which he or she might otherwise have had hereunder. Any generation-skipping transfer tax which might arise pursuant to this Item shall be paid from such share. If all of the persons who are beneficiaries of the residue of my estate join in such a contest or proceeding, such residue shall go over and be distributed to or for the benefit of any organization that may receive transfers qualifying for the federal estate tax charitable deduction at the time of the distribution. This paragraph shall not be effective with regard to any bequest made from my estate which qualifies for the federal estate tax marital deduction.

[SIGNATURES APPEAR ON THE FOLLOWING PAGES]

IN WITNESS WHEREOF, I have hereunto set my hand and seal on this my Will, this 10 day of September 2023.

_____(Seal)
BODHISATTWA DAS

Signed, sealed, published, and declared by BODHISATTWA DAS, as his Last Will and Testament in our presence and we, at his request and in his presence, and in the presence of each other, have hereunto subscribed our names as witnesses the day and year above set out.

WITNESSES:

ALPHA TEST

BETA TEST
STATE OF GEORGIA *SELF-PROVING AFFIDAVIT*
COUNTY OF APPLING

Before me, the undersigned authority, on this day personally appeared , ALPHA TEST , and BETA TEST, known to me to be the Testator and the witnesses, respectively, whose names are subscribed to the annexed or foregoing instrument in their respective capacities, and all of said persons being by me duly sworn, STEVEN SCOTT RAMAGE, JR., Testator, declared to me and to the said witnesses in my presence that said instrument is his Last Will and Testament and that he had willingly made and executed it as his free act and deed for the purposes therein expressed. The witnesses, each on his or her oath, stated to me in the presence and hearing of the Testator that the Testator had declared to them that the instrument is his Last Will and Testament and that he executed same as such and wanted each of them to sign it as a witness; and upon his or her oath each witness stated further that he or she did sign the same as witness in the presence of the Testator and at his request; that he was at that time 14 years of age or over and was of sound mind; and that each of said witnesses was then at least 14 years of age.

BODHISATTWA DAS, Testator

ALPHA TEST

BETA TEST

Subscribed, sworn to and acknowledged before me by BODHISATTWA DAS, the Testator, and ALPHA TEST and BETA TEST witnesses, this this 10 day of September 2023.

Notary Public