

STATE OF ALABAMA )  
 )  
 MADISON COUNTY )

IN THE CIRCUIT COURT, IN EQUITY

CAUSE NO. \_\_\_\_\_

LLOYD JONES, REVA JONES BOYD,  
 LILLIE MAE CRAWFORD and  
 CHARLIE ELDRIDGE,

ORIGINAL BILL  
 Filed: Nov. 18, 1963

COMPLAINANTS,

VS.

NEAL COLLIER, THE UNKNOWN HEIRS  
 OF NEAL COLLIER, W. L. SANDERSON,  
 GEORGE T. CULPS, AS TAX COLLECTOR;  
 THE BOARD OF TRUSTEES OF THE  
 UNIVERSITY OF ALABAMA, a body  
 corporate pursuant to Section 486  
 of Title 52 of the 1940 Code of  
 Alabama, as amended; together with  
 any other party or parties who may  
 claim to own any right, title or  
 interest in or to or hold any lien  
 against the property hereinafter  
 described situated in the City of  
 Huntsville, County of Madison,  
 State of Alabama,

RESPONDENTS.

TO THE HONORABLE JUDGES OF THE TWENTY THIRD JUDICIAL CIRCUIT OF ALABAMA, SITTING  
 IN EQUITY:

COME your complainants and respectfully represent as follows:

1. Your complainant Lloyd Jones is a citizen of Detroit, Michigan; your complainant Reva Jones Boyd is a citizen of Memphis, Tennessee; your complainant Lillie Mae Crawford is a citizen of Detroit, Michigan; your complainant Charlie Eldridge is a citizen of Detroit, Michigan; that the whereabouts of the respondent Neal Collier has been unknown for more than twenty-five years although a reasonable effort to ascertain his whereabouts has been made by his kinfolk and that he is presumed dead without lineal descendants; that the respondent W. L. Sanderson is a bona fide resident citizen of Madison County, Alabama; that the respondent George T. Culps is a resident citizen of and Tax Collector for Madison County, Alabama; that the respondent The Board of Trustees of the University of Alabama, is a body corporate pursuant to Section 486 of Title 52 of the 1940 Code of Alabama, as amended; that each of said complainants and respondents are over the age of twenty-one years and are of sound mind. Your complainants further aver that they do not know of any other person, firm, or corporation who claims the land, the subject of this suit, or any title to, interest in, lien or encumbrance thereon, or any part thereof other than the above named respondents.

2. That your complainant Lloyd Jones has a one-eighth interest in property hereinafter described; that your complainant Reva Jones Boyd has a one-eighth interest; that Lillie Mae Crawford has a one-eighth interest; that the respondent The Board of Trustees of the University of Alabama, has a one-eighth interest; that the complainant Charlie Eldridge has a one-half interest in and to the following lands lying in the City of Huntsville, Madison County, Alabama, to-wit:

Beginning at a point on the North margin of Athens Pike, which point is 10 chains East and .70 chains North from the Southwest corner of Section 33, Township 3, Range 1 West; thence North  $1\frac{1}{4}$  degrees West 11.50 chains to an iron stake; thence West parallel with the section line 2.03 chains to an iron stake; thence South  $1\frac{1}{4}$  degrees East 11.10 chains to an iron stake on the North margin of Athens Pike; thence along the North margin of said Pike South  $78\frac{1}{4}$  degrees East 2.03 chains to the place of beginning and containing 2.25 acres more or less; LESS AND EXCEPTING THEREFROM a lot 40 feet East and West and 60 feet North and South in the Southwest corner of said tract.

3. That Lloyd Jones, Reva Jones Boyd, Willie Fay Jones and Lillie Mae Jones were the only children of Tommy Lee Jones; that Charlie Eldridge and Josie Jordan were the only children of Queen Ann Jones Jordan; that Tommy Lee Jones and Queen Ann Jones Jordan were the children of Lizzie Jones who departed this life during or about the year 1906, while a resident of Madison County, Alabama; that the said Lizzie Jones had two other children, Emma Blair and Haywood Jones, both of whom were not survived by a spouse or lineal descendants and whose heirs were Tommy Lee Jones and Queen Ann Jones Jordan. Your complainants aver that Lizzie Jones and subsequent to her death Tommy Lee Jones and Queen Ann Jones Jordan and subsequent to their respective deaths Lloyd Jones, Reva Jones Boyd, Willie Fay Jones and Lillie Mae Jones, children of Tommy Lee Jones and Charlie Eldridge and Josie Jordan, children of Queen Ann Jones Jordan, claimed the above described property for a period of more than seventy years against all the world, being in the actual possession thereof and claiming same openly, notoriously, adversely, continuously and exclusively against all the world, treating said property in every respect as their own. Your complainants further aver that Lillie Mae Jones died leaving surviving her one daughter, Lillie Mae Crawford; that Willie Fay Jones conveyed his interest in the property described herein to W. L. Sanderson Realty Company on October 15, 1958, by conveyance recorded in Deed Book 265, page 314 of the Probate Records of Madison County, Alabama; that W. L. Sanderson Realty Company, Inc. transferred, by quitclaim

deed on April 6, 1962, which deed is recorded in Deed Book 306, page 565, all of its right, title and interest to the Board of Trustees of the University of Alabama and again by quitclaim deed from W. L. Sanderson and wife, Gladys S. Sanderson, to the Board of Trustees of the University of Alabama, all of their right, title and interest in and to subject property, said instrument being recorded in Deed Book 306, page 567 of the Probate Records of Madison County, Alabama.

4. Your complainants aver that George T. Culps as Tax Collector is entitled to any unpaid ad valorem taxes on said property which have accrued during the past three years and have remained unpaid.

5. Your complainants aver that the services of a solicitor were necessary for the bringing of this suit and that the firm of Watts, Salmon, Roberts & Stephens were engaged for that purpose and they are entitled to a reasonable attorney's fee.

THE PREMISES CONSIDERED, your complainants bring this bill of complaint against any and all persons claiming any interest in, title to, lien or encumbrance upon said land or any part thereof, and, by name, Neal Collier, the unknown heirs of Neal Collier, George T. Culps, W. L. Sanderson and the Board of Trustees of the University of Alabama, a body corporate pursuant to Section 486 of Title 52 of the 1940 Code of Alabama, as amended, and pray that all be made a party to this bill of complaint and that process of this court be issued against each and all of said parties; requiring each to plead, answer or demur to the bill of complaint within the time prescribed by law or that same shall stand confessed and your complainants further pray that the court on a hearing of this cause will enter a decree making the following determinations and orders:

1. The respective interest which each of the parties to this suit have in the lands described in paragraph 2 hereof;
2. That your Honor will determine the sums to which each of the parties to this suit are entitled from the award heretofore paid into the Probate Court and transferred to this Court;
3. That your Honor will determine a reasonable solicitor's fee and will tax same as costs in this cause;
4. That your Honor will determine the ad valorem taxes due George T. Culps as Tax Collector and will tax said sum as part of the costs in this cause.

And that on a final hearing and decree your Honor will direct the Register of this court to pay to the parties hereto, as their interests appear, the sums held by the Register of this Court, for the taking of the lands described herein and will award such other, further, additional and general relief as to the Court may seem meet and proper.

WATTS, SALMON, ROBERTS & STEPHENS

By *Roman Roberts*  
Attorneys for Complainants

I, W. L. Sanderson, do hereby acknowledge service of a copy of the summons and complaint in this cause, this 15 day of November, 1963.

*W. L. Sanderson*  
W. L. Sanderson

I, George T. Culps, as Tax Collector, being a respondent in this cause, do hereby acknowledge service of a copy of the summons and complaint, this the 15<sup>th</sup> day of November, 1963.

*Geo. T. Culps*  
George T. Culps, Tax Collector

I, Patrick Richardson, Attorney in Fact for The Board of Trustees of the University of Alabama, do hereby acknowledge, on behalf of said Board of Trustees of the University of Alabama, service of a copy of the summons and complaint in this cause, on this the 15<sup>th</sup> day of November, 1963.

*Patrick A. Richardson*  
Patrick Richardson