

STATE OF ALABAMA
MADISON COUNTY

IN THE CIRCUIT COURT, IN EQUITY
CAUSE NO. 18604

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

COMPLAINANTS,

VS.

ANSWER

Filed: Dec. 13, 1963

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

NOW COMES the Board of Trustees of the University of Alabama, a
respondent in the above styled cause, and makes answer to the bill of
complaint and to each and every Paragraph thereof, separately and
severally, as follows:

1. Respondent is without knowledge of information sufficient to
enable it to admit, deny, or confess and avoid the averments of Paragraph
1 of the bill of complaint, except that it admits that it is a body corporate
pursuant to Section 486 of Title 52, Code of Alabama, 1940, as amended.
2. Respondent denies the allegations of Paragraph 2 of the bill of
complaint and demands strict proof thereof. Respondent avers that it is
informed and believes the interests in said property were computed in
accordance with a purported division between the heirs of Columbus Jones
which is not of record in the Official Records of Madison County, Alabama.
3. Respondent denies the allegations of Paragraph 3 of the bill of
complaint and demands strict proof thereof.
4. Respondent admits the allegations of Paragraph 4 of the bill of
complaint.
5. Respondent denies the allegations of Paragraph 5 of the bill of
complaint and demands strict proof thereof.

FOR ANSWER TO SAID BILL and to each and every Paragraph thereof,
separately and severally, now comes the respondent, the Board of
Trustees of the University of Alabama, as cross-complainant by way of
cross-bill and represents unto the Court the following:

6. Respondent avers that it claims a 1/20 part of the amount of
compensation and damages of \$25,000.00 paid into this Court for the

owners of the lands described as "Exhibit 7" of the petition by the City of Huntsville and Madison County in Cause Number 14431, Probate Court of Madison County, Alabama, less and except that portion of said lands described as "Paragraph 7A" of the report of the Commissioners in said cause.

7. Respondent avers that its claim is predicated upon the following chain of title.

- A. Commencing with purchase by Columbus Jones;
- B. Inheritance from Columbus Jones by his two children, Nina Jones Collier and Lizzie Jones;
- C. Inheritance from Lizzie Jones by her two children, Tommie Lee Jones and Queen Ann Jones Jordan;
- D. Inheritance from Tommie Lee Jones by his five children including Willie Jones;
- E. Purchase from Willie Jones by W. L. Sanderson Realty, Inc.;
- F. Purchase from W. L. Sanderson Realty, Inc., by the Board of Trustees of the University of Alabama.

The premises considered, respondent and cross-complainant brings this cross-bill against any and all persons claiming any interest in title from, lien or encumbrance upon said land as previously described as "Exhibit 7" less and except "Paragraph 7A" of any part thereof, and by name the other respondents herein, George T. Culps, W. L. Sanderson, Neal Collier, and the unknown heirs of Neal Collier, and the complainants herein, Lloyd Jones, Reva Jones Boyd, Lillie Mae Crawford and Charlie Eldridge, and pray that all be made a party to this cross-complaint; that process of this Court be issued against the said George T. Culp and W. L. Sanderson; and that all of said parties be required to plead, answer or demur to this cross-bill within the time prescribed by law or that same shall stand confessed. Respondent and cross-complainant further prays that the Court on a hearing of this cause will enter a decree awarding the Respondent and cross-complainant herein 1/20 of the award hereto paid into the Probate Court and transferred to this Court and that on a final hearing your Honor will direct the Register of the Court to pay to respondent and cross-complainant herein, as its interest appears, 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.

BELL, MORRING , RICHARDSON & CLEARY

BY C. Tennent Lee, III
Solicitors For Respondent and
Cross-Complainant