

STATE OF ALABAMA  
MADISON COUNTY

IN THE CIRCUIT COURT IN EQUITY  
CASE NUMBER 18604

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

COMPLAINANTS

VS.

AMENDMENT OF ANSWER  
AND CROSS BILL  
Filed: Feb. 27, 1964

NEAL COLLIER, et al.

RESPONDENTS

Comes now the Board of Trustees of the University of Alabama, a respondent in the above styled cause, and amends its answer to the bill of complaint and to each and every paragraph thereof separately and severally as follows:

8. Respondent admits to the allegations in paragraph two of the bill of complaint.
9. Respondent admits the allegations of paragraph three of the bill of complaint.
10. Respondent is without knowledge or information sufficient to enable it to admit, deny or confess and avoid the averments of paragraph five of the bill of complaint.

Comes now the respondent, the Board of Trustees of the University of Alabama and amends its cross complaint and represents unto the Court as follows:

11. Respondent avers that it is entitled to a 1/8 part to <sup>2.25%</sup> ~~5.72~~ of 9.57 fractional part 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 7-A of the report of the commissioners in said cause.
12. 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. During the lives of Nina Jones Collier and Lizzie Jones they agreed between themselves and their brother, Richard Jones to divide a 12 acre tract lying in the southwest corner of Section 33, Township 3 South, Range 1 West, Madison County, Alabama into 3 equal shares. That at that time Lizzie Jones went into possession of that tract listed in paragraph two of the complainants bill of complaint.
  - 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 four children including Willie Jones
  - E. Purchase from Willie Jones by W. L. Sanderson Realty, Inc., on October 15, 1958 which deed was filed for record on October 20, 1958 and is recorded in Deed Book 265, page 314, Probate Records of Madison County, Alabama
  - F. Purchase from W. L. Sanderson Realty, Inc., by the Board of Trustees of the University of Alabama on April 6, 1962 which deed was filed for record on April 9, 1962 and is recorded in Deed Book 306, page 565, Probate Records of Madison County, Alabama

BELL, RICHARDSON, CLEARY, McLAIN & TUCKER

By L. Tennent Lee, III

Solicitors for Respondent and Cross Complaint