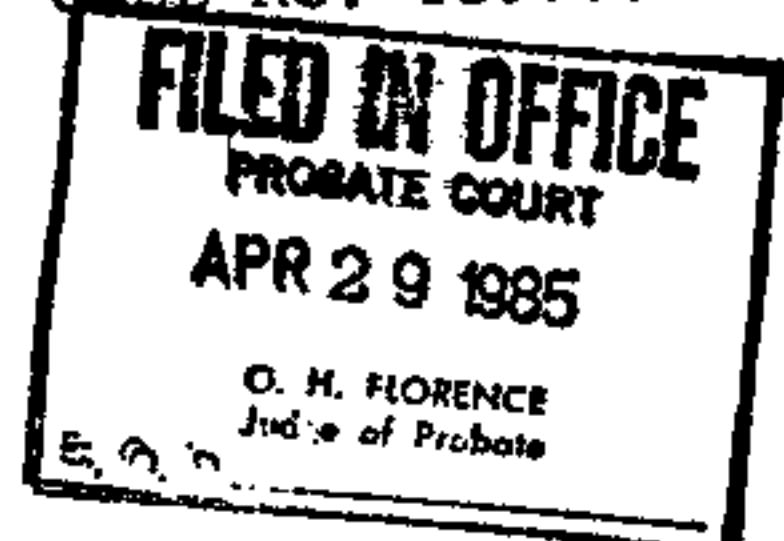


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IN THE PROBATE COURT OF JEFFERSON COUNTY
EQUITY JURISDICTION

RE: IN THE MATTER OF THE ESTATE OF
DOLPHUS WILSON HUMPHRIES,
DECEASED.

CASE NO. 115763



WILLIAM W. HUMPHRIES, PLAINTIFF
VS.

BLANCHE SAMMONS and/or ROBERT C. BARNETT, as individuals and as
executors of the ESTATE OF DOLPHUS WILSON HUMPHRIES, and

A, B and C, the persons, partnership, corporation or other legal
entity who is a necessary and proper party to the below styled
Will Contest as required by the Code of Alabama 43-1-80 and whose
names and addresses are otherwise unknown and will be added by
amendment when so ascertained, and

D, E and F, the persons, partnership, corporation or other legal
entity who participated, aided, abetted and/or conspired to
unlawfully secure the Last Will and Testament of Dolphus Wilson
Humphries, dated May 16, 1984, and whose names and addresses are
otherwise unknown and will be added by amendment when so
ascertained, and

G, H and I, the persons, partnership, corporation or other legal
entity who aided, abetted, participated and/or conspired to
unlawfully transfer personal and/or real property of Dolphus
Wilson Humphries during the years 1983, 1984 and through 1985 up
until the time of his death and whose names and addresses are
otherwise unknown and will be added by amendment when so
ascertained, and

J, K and L, the persons, partnership, corporation or other legal
entity who participated in any act of undue influence practiced
upon Dolphus Wilson Humphries during the years 1983, 1984 and
1985 until his death and whose names and addresses are otherwise
unknown and will be added by amendment when so ascertained, and

M, N and O, the persons, partnership, corporation or other legal
entity who secured, participated and/or received any benefit from
Dolphus Wilson Humphries as a result of the mental incapacity of
Dolphus Wilson Humphries during the years 1983, 1984 and 1985
until his death and whose names and addresses are otherwise
unknown and will be added by amendment when so ascertained, and

P, Q and R, the persons, partnership, corporation or other legal
entity who participated, aided, abetted, conspired, secured
and/or cooperated in the preparation of written documents signed
by Dolphus Wilson Humphries during the years 1983, 1984 and 1985
up until his death and whose names and addresses are otherwise
unknown and will be added by amendment when so ascertained,
DEFENDANTS.

M. WAYNE WHEELER, P.C.
ATTORNEY AT LAW
2230 THIRD AVENUE NORTH
BIRMINGHAM, ALABAMA 35203-3877

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BILL OF COMPLAINT

JURISDICTION AND VENUE

1. This matter is a Will Contest under the Code of Alabama 43-1-79 (1975) and is related to the Estate of Dolphus Wilson Humphries, deceased, who has an estate pending in Jefferson County, Alabama. The primary acts relating to this contest occurred in Jefferson County, Alabama. The contestant invokes the Equity Jurisdiction of the court pursuant of Act. No. 1144.

PARTIES

2. The Plaintiff is an adult of sound mind, and is the son of Dolphus Wilson Humphries, deceased. Plaintiff is an interested party under Code of Alabama 43-1-79 (1975). The estate was probated March 21, 1985 and is being administered in Case number 115763 of the Probate Court of Jefferson County.

3. The Defendants, Blanche Sammons and Robert C. Barnett, are adults, of sound mind, who are being sued individually and as the legal representatives of the Estate of Dolphus Wilson Humphries.

4. That a complete listing of all names, addresses, ages and conditions of all parties interested in the probate of the will as required by Code of Alabama 43-1-80 (1975) is unknown, but upon discovery will be added by amendment.

5. That there are unknown parties named above whose names, addresses, ages and conditions are unknown and will be added by amendment when so ascertained.

FACTS ON WHICH THE COMPLAINT IS BASED

6. The Last Will and Testament of the deceased Dolphus Wilson Humphries was not properly executed according to the Law of Alabama.

7. The Last Will and Testament of the deceased Dolphus Wilson Humphries was executed at a time when said decedent was mentally incompetent.

8. The Last Will and Testament of the deceased Dolphus Wilson Humphries was secured by the undue influence of Blanche Sammons, her agents, servants, employees or other parties acting at her request and/or direction.

9. That beginning in late 1983, 1984 and 1985 up until the time of Dolphus Wilson Humphries' death, the Defendants, by the exercise of undue influence and/or the result of mental incompetency of Dolphus Wilson Humphries, secured the unlawful transfer of assets to the Defendants. That the exact nature of the transfers are unknown at this time.

10. That Blanche Sammons secured and used a Durable Power of Attorney from Dolphus Wilson Humphries that is in existence but the exact use or terms and conditions are unknown.

11. Further, that there are unknown parties named above A-R whose specific relation and facts to this matter are unknown at this time.

COUNTS OF THE COMPLAINT

12. The Plaintiff seeks to establish a cause of action to contest the will of Dolphus Wilson Humphries on the grounds of

- A) improper execution
- B) mental incompetency
- C) undue influence

13. Upon discovery, the Plaintiff seeks to establish a cause of action to secure the return of all real and/or personal property transferred by Dolphus Wilson Humphries during 1983, 1984 and 1985 up until the time of his death, or in the alternative to secure an accounting and/or monetary judgment against the Defendants.

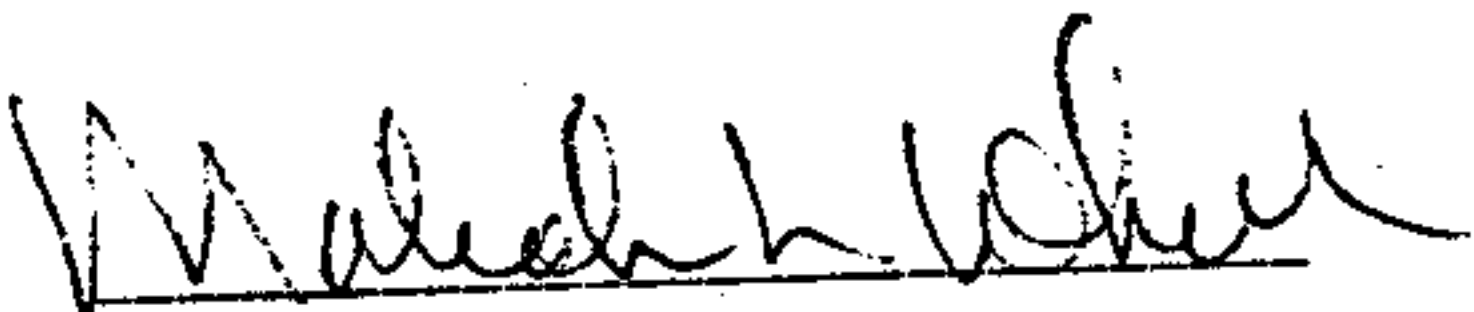
14. The Plaintiff would seek such other further and general relief to which Plaintiff is entitled.

15. Fictitious Party Count: The Plaintiff would incorporate Paragraphs 1-14 and assert the same grounds against all unknown parties.

JURY DEMAND

16. The Plaintiff would demand a trial by a struck jury.


M. WAYNE WHEELER
ATTORNEY FOR PLAINTIFF


MALCOLM L. WHEELER
ATTORNEY FOR PLAINTIFF

PLAINTIFF ADDRESS

2720 Montgomery Highway
Pelham, AL 35124

PLAINTIFF

William W. Humphries

DEFENDANT ADDRESS

2504 Hawksbury Lane
Hoover, AL 35226

DEFENDANT

Blanche Sammons

Robert C. Barnett

2524 Hawksbury Lane
Hoover, AL 35226

STATE OF ALA. SHELBY CO.
I CERTIFY THIS
INSTRUMENT WAS FILED

1985 MAY -1 AM 9:21


JUDGE OF PROBATE

RECORDING FEES

Recording Fee	\$ 12.50
Index Fee	1.00
TOTAL	\$ 13.50