

IN THE PROBATE COURT OF SHELBY COUNTY, ALABAMA

**IN RE: Landlocked property located at 2370 Cahaba Valley Road,
Parcel I.D.#10-8-28-0-001-037.000; Owners, Jenny Cumberland,
Sandra Key, Martha Stafford.**

**Property owners preventing passage: 2450 Cahaba Valley Road,
Parcel I.D.#10-8-28-0-001-037.005; Jess and Eloise Barton.**

**Jenny Cumberland,
Sandra Key,
Martha E. Stafford**

**Plaintiffs,
V.**

**Jess Barton,
Eloise Barton
Defendants**

PETITION FOR LIS PENDENS

COMES NOW the Petitioners, by and through their Attorney
of record, Anne Marie Hicks, and hereby submits to this Honorable Court
the facts as follows:

1. Petitioners own the land situated at the survey position
marked as 2370 Cahaba Valley Road with Parcel I.D.# 10-8-28-0-001-
037.000

2. There is one easement by survey that begins from highway

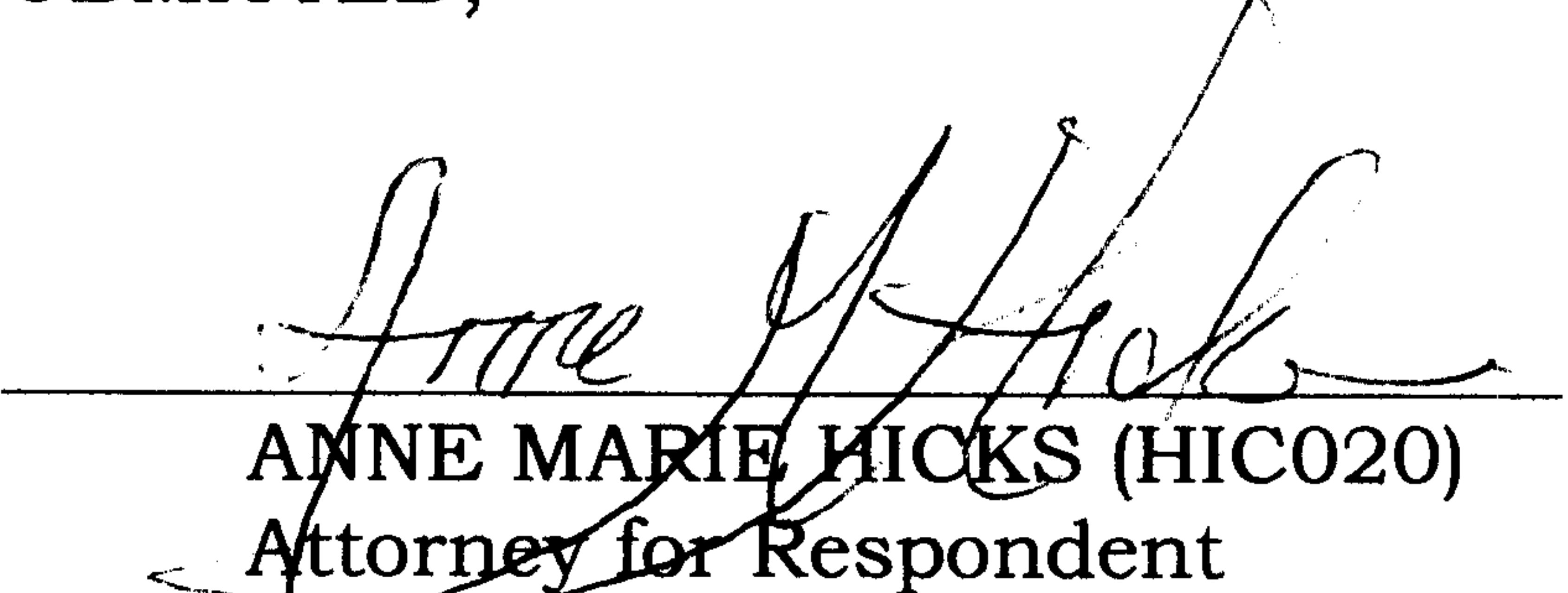
119 and appears to cease in front of the property owned by Jess and Eloise Barton, which is presented on EXHIBIT A; the Bartons' property is at 2450 Cahaba Valley Road and rests between Highway 119 and the property which is the subject of this action;

3. At present, the aforementioned property dispute arises due to the fact that the land at 2370 Cahaba Valley Road is landlocked without reasonable access and therefore is at present unable to be sold without cloud on title;

4. Petitioners request that during the pendency of this action, this information be presented to put all interested parties on notice that the land cannot be transferred under the current circumstances;

5. The property in question was surveyed in 1996 by Amos, Cory and Associates and recorded under Alabama CA-0249-LS(488-94) and had previously surveyed and recorded by instrument#1994-16416 in the Shelby County Probate office.

RESPECTFULLY SUBMITTED,


ANNE MARIE HICKS (HIC020)
Attorney for Respondent
P.O. Box 131165
Birmingham, AL 35213
(205) 337-2420