

STATE OF TEXAS

COUNTY OF Bell

)
)
)

AFFIDAVIT

Before me, the undersigned authority, personally appeared JOSEPH ELLEN HUGHES, who after being duly sworn, did depose and say as follows:

1. My name is JOSEPH ELLEN HUGHES and my address is 2814 Fieldstone Drive, TX 76549. I am 61 years old. I currently work for Borden Milk, Inc. in the merchandising department.

2. That I am the ex-wife of Larry Hughes, Sr.

3. That I am the mother of Larry Hughes, Jr.

4. That Larry Hughes, Sr. and Howard Hughes are brothers.

5. That Larry Hughes, Sr. and Howard Hughes are the children of Howard and Luverne Hughes.

6. That I know Howard Hughes and the Hughes family very well as I was in the Hughes family for about thirty (32) years.


7. That the house located at the address of 11235 Highway 25 Calera, Alabama 35040 has been owned and claimed openly, notoriously, exclusively, continuously, and hostilely by the Hughes family for as long as I can remember at least since I was thirteen (13) years old, which is has been forty-eight (48) years.

8. That me and my children, in or about the years of 1978-1980, lived in that house for approximately one year while my ex-husband, Larry Hughes, Sr., was stationed in Korea with the Army.

9. That in between me living in the house the Hughes family has allowed other people to also live in and/or rent the house but that the house has always been owned and claimed by the Hughes family.

10. That the house is located in Shelby County, Calera, Alabama, along Highway 25 and that it is a white house with aluminum siding, has a kitchen, a living room, two (2) bedrooms, and one (1) bathroom.

11. That while me and my children lived in the house I took care of the yard, mowed the grass, and acted with dominion and control over the house as a true owner of a house would.


20110513000144540 1/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT

12. That the lot where the house is located consists of approximately ½ acre.

13. That the pictures attached hereto as Exhibit "A" are true and correct pictures of the house and surrounding yard that is owned and claimed by Howard Hughes and the Hughes family in which I lived in with my children for about a year around the years 1978-1980 and in which several other people have also been allowed to live in and/or rent from the Hughes family.

14. That others in the surrounding community have known that the house and property are owned and claimed by the Hughes family.

15. That no one has ever told me that I lived in a house that wasn't owned by the Hughes family.

16. It is my opinion, because Howard Hughes and the Hughes family has owned and claimed the house and property at the address of 11235 Highway 25 Calera, Alabama 35040 to be their property for over 48 years by openly and notoriously maintaining possession and dominion and control over the house and because they have shown hostility in mowing the lawn, maintaining the house and property, and because they have continuously held uninterrupted possession of the house and property and because they have shown exclusivity over the house by allowing others to live in and/or rent the house and mowing the lawn, which are all acts a true owner would do, then I believe Howard Hughes and the Hughes family have obtained said property by way of adverse possession.

17. The foregoing is based on my personal knowledge.

This the 20th day of April, 2011.

Joe Ellen Hughes
JOE ELLEN HUGHES

STATE OF

Texas

COUNTY OF

Bell

Sworn to and subscribed by JOSEPH ELLEN HUGHES, of Keller, Texas, before me on this 20th day of April, 2011.

Carolynn Champlin
NOTARY PUBLIC (SEAL)
MCE: Aug 31, 2012

Prepared by:

Phillip A. Laird, Esq.

LAIRD & ROBERTSON, P.C.

P.O. Box 498

Jasper, AL 35502-0498

(205) 221-5601

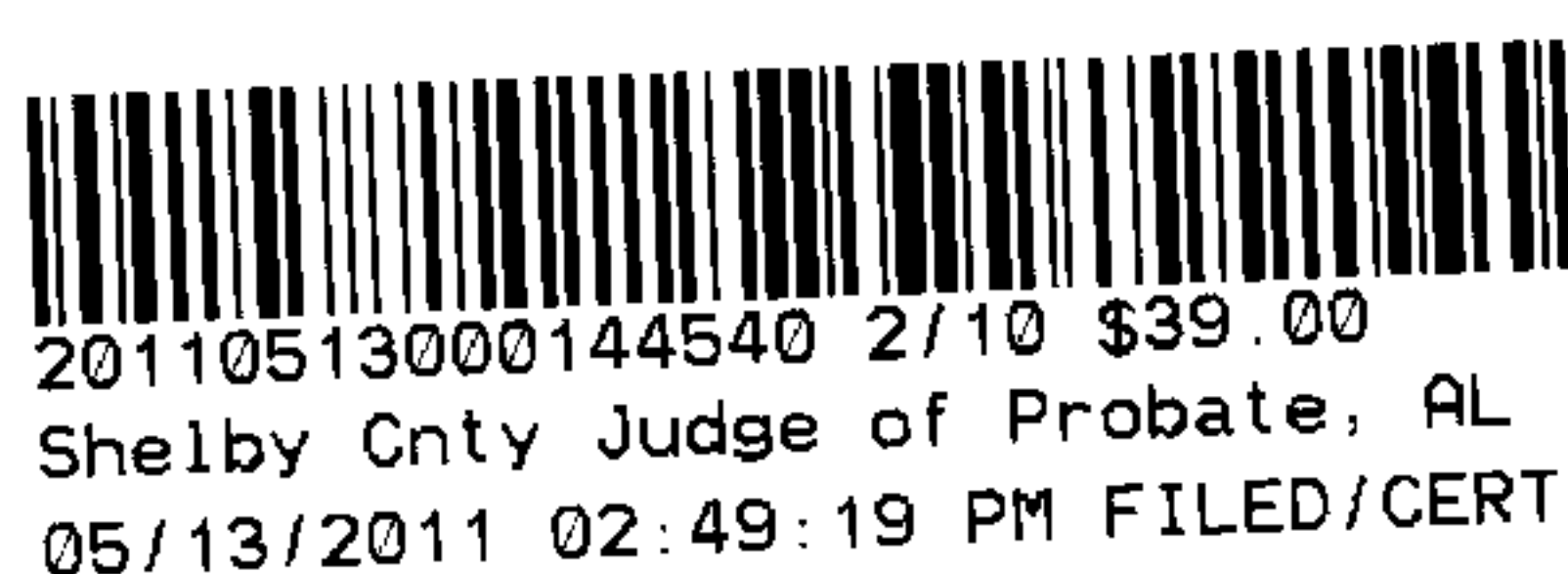
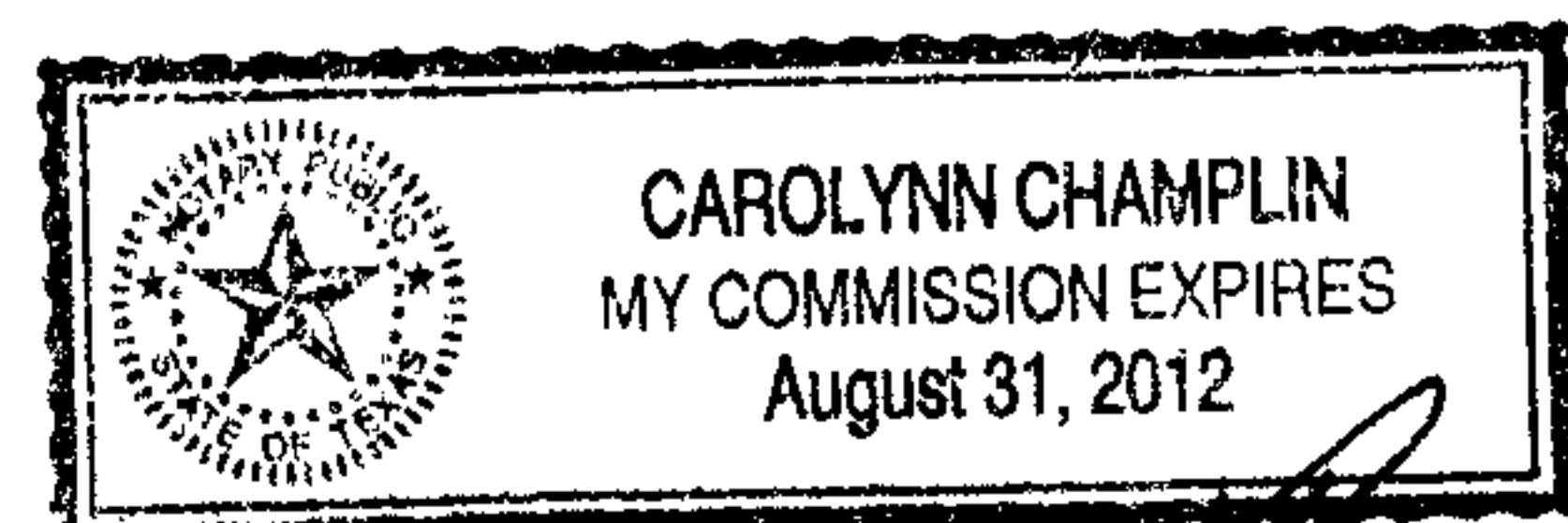

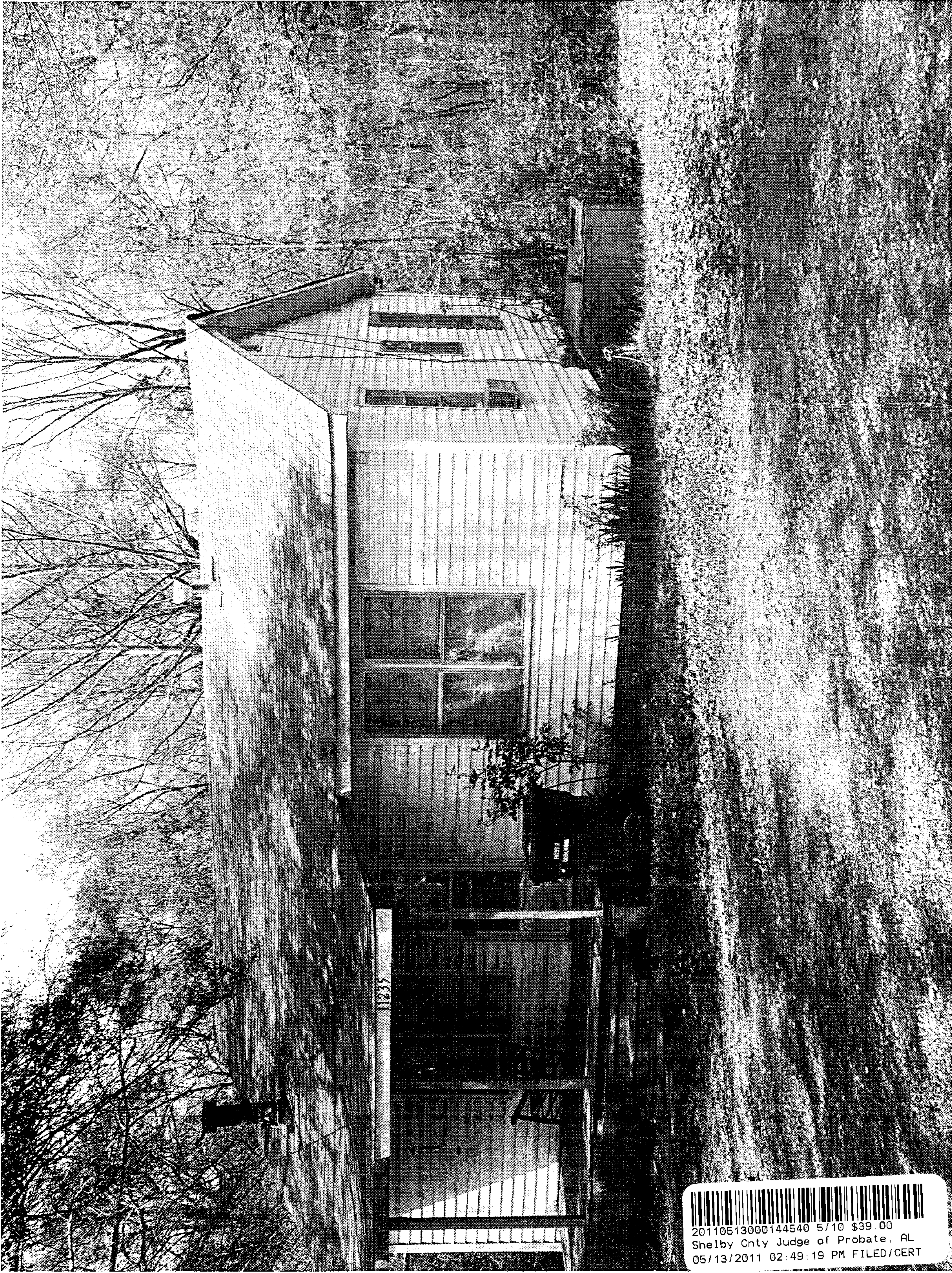


EXHIBIT "A"


20110513000144540 3/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT



20110513000144540 4/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT



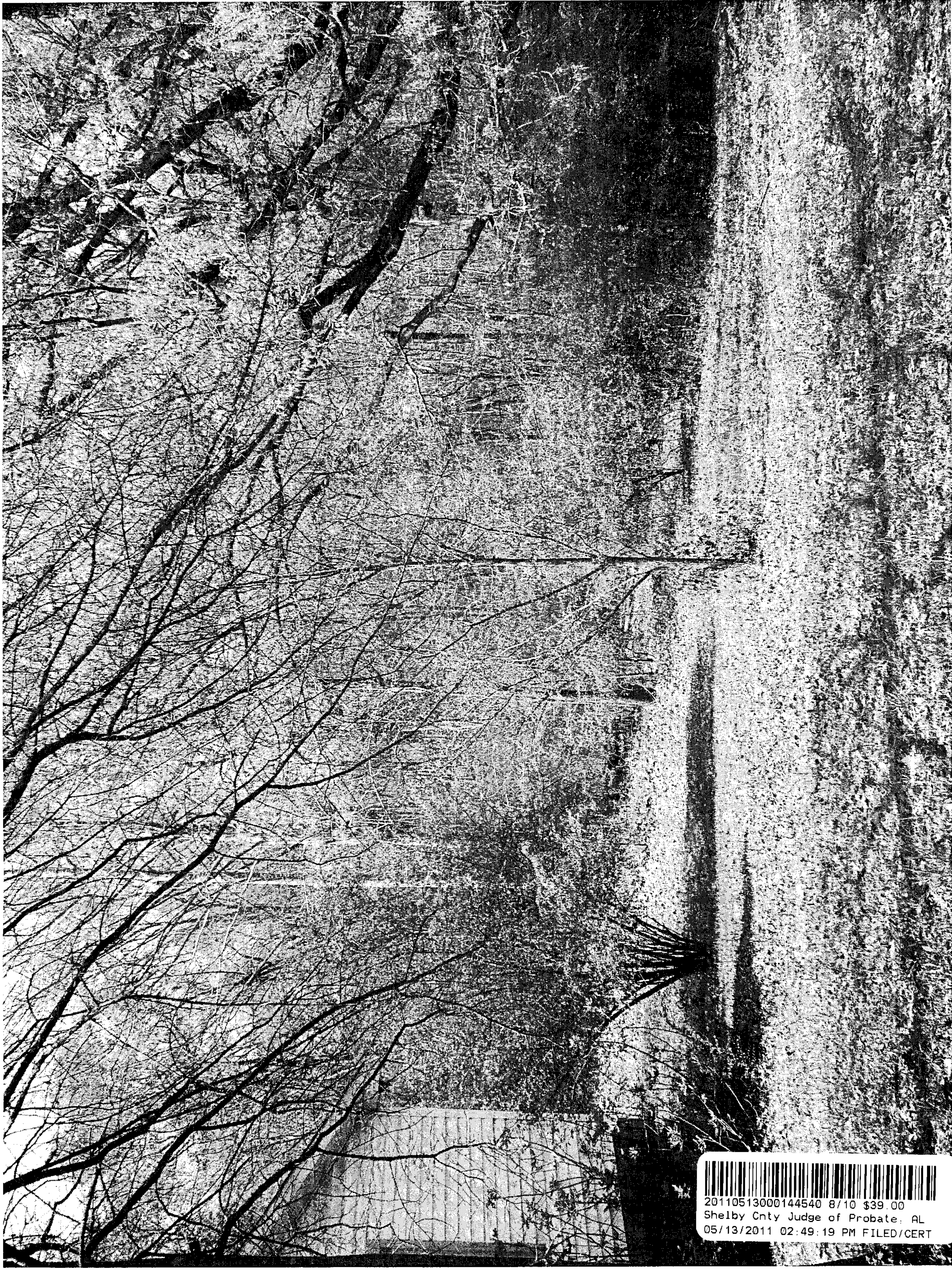
20110513000144540 5/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT



20110513000144540 6/10 \$39.00
Shelby Only Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT



20110513000144540 7/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT



20110513000144540 8/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT



20110513000144540 9/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT

20110513000144540 10/10 \$39.00
Shelby Cnty Judge of Probate, AL
05/13/2011 02:49:19 PM FILED/CERT