

STATE OF ALABAMA

JEFFERSON COUNTY

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NOTICE OF LIS PENDENS

TO THE JUDGE OF PROBATE OF SHELBY COUNTY, ALABAMA:

You are hereby notified that on or about the 11th day of April, 2013, an estate proceeding was commenced in the Probate Court of Shelby County, Alabama, styled as **In the Matter of: The Estate of Perry Eugene Cox, Sr., Deceased**, Case No. PR-2013-000281. In said probate proceeding, title to real property situated in Shelby County, Alabama, with record title in the name of a purported partnership called **Country Hills Estate** is involved and in dispute, including but not necessarily limited to the following parcels:

Parcel 1. Legal Description: As described in that certain Warranty Deed recorded August 18, 2008, as **instrument number 20080818000331310** in the Probate Office of Shelby County, Alabama, portions of which are attached hereto as Exhibit A and made a part hereof.

Parcel 2. Legal Description: As described in that certain Warranty Deed recorded December 18, 2008, as **instrument number 20081218000470200** in the Probate Office of Shelby County, Alabama, portions of which are attached hereto as Exhibit B and made a part hereof.

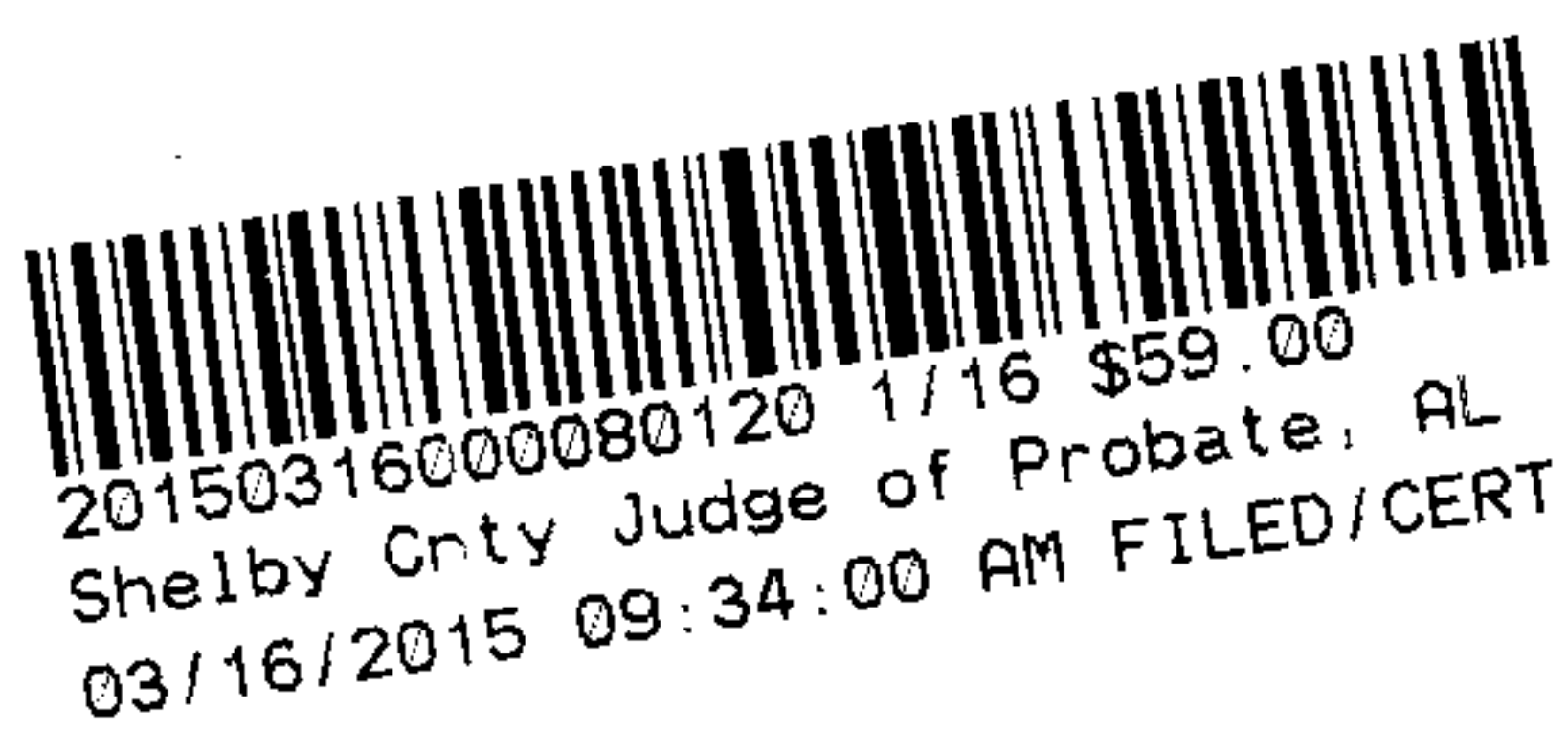
The claimants who are filing this notice are **Shirley Cox Wise, Debra Cox McCurdy and Jennie Jo Cox Parrish**, who are beneficiaries under the Last Will and Testament of Perry Eugene Cox, Sr., and who contend that all property held in the name of Country Hills Estate is property of the Estate of Perry Eugene Cox, Sr.

Opposing the claimants in the estate proceeding is **Perry Eugene Cox, Jr.**, a Co-Personal Representative and a beneficiary under the Last Will and Testament of Perry Eugene Cox, Sr., who has asserted an individual claim or right to all property held in the name of Country Hills Estate.

The nature of the dispute regarding title to and ownership of the above-referenced property is set out in the paper attached hereto as Exhibit C, which is made a part hereof.

This notice is provided under the authority of *Johnson v. Gartman*, 173 Ala. 290, 55 So. 906 (1911).

This the 16th day of March, 2015.



A handwritten signature in black ink, which appears to read "Randall D. Quarles", is written over a horizontal line.


Randall D. Quarles (QUA006)

An Attorney for Shirley Cox Wise, Debra Cox
McCurdy and Jennie Jo Cox Parrish


OF COUNSEL:

QUARLES LAW FIRM, LLC
300 Office Park Drive, Suite 100
Mountain Brook, AL 35223
Telephone: (205) 874-7000
Telecopier: (205) 874-7002
rquarles@quarleslawfirm.com

Sworn to and subscribed before me on this 16th day of March, 2015.



Notary Public 2-7-17


20150316000080120 2/16 \$59.00
Shelby Cnty Judge of Probate, AL
03/16/2015 09:34:00 AM FILED/CERT

WARRANTY DEED

20080818000331310 1/6 \$27.00
Shelby Cnty Judge of Probate, AL
08/18/2008 12:45:46PM FILED/CERT

STATE OF ALABAMA }
SHELBY COUNTY }

KNOW ALL MEN BY THESE PRESENTS:

1000' ² *W*

That in consideration of Five Hundred and No/ 100 (\$500.00) Dollars cash to the undersigned GRANTOR (whether one or more), in hand paid by the GRANTEE herein, the receipt whereof is acknowledged, We, Perry E. Cox, Sr.; and Perry E. Cox, Jr., (herein referred to as GRANTOR, whether one or more), grant, bargain, sell and convey unto COUNTRY HILLS ESTATE, a General Partnership - Perry E. Cox, Sr. ; Perry E. Cox, Jr. (herein referred to as GRANTEE, whether one or more), the following described real estate, situated in Shelby County, Alabama (the "Property"), to-wit:

LONG LEGAL see EXHIBIT 'A' Previously recorded in BOOK 355 PAGE 271-273

LONG LEGAL see EXHIBIT 'B' Previously recorded in INST. # 1995-35434

LONG LEGAL see EXHIBIT 'C' Previously recorded in INST. # 1993-04165

LONG LEGAL see EXHIBIT 'D' Previously recorded in BOOK 222 PAGE 733

The Northwest one-fourth of Northwest one-fourth (NW- 1/4 of NW-1/4) Section Thirty-Six (36), Township Eighteen (18), Range One (1) East. Previously recorded in BOOK 301 PAGE 759-761 on July 23, 1990.

The Northeast one-fourth of Northwest one-fourth (NE-1/4 of NW-1/4) Section Thirty-Six (36), Township Eighteen (18), Range One (1) East. Previously recorded in BOOK 301 PAGE 762-764.

TO HAVE AND TO HOLD the Property to the said GRANTEE, his, her or their heirs and assigns forever.

And I (we) do, for myself (ourselves) and for my (our) heirs, executors and administrators, covenant with said grantee, his, her or their heirs and assigns, that I am (we are) lawfully seized in fee simple of said premises; that they are free from all encumbrances, unless otherwise stated above; that I (we) have a good right to sell and convey the same as aforesaid; that I (we) will, and my (our) heirs, executors and administrators shall warrant and defend the same to the said grantee, his, her or their heirs and assigns forever, against the lawful claims of all persons.

IN WITNESS WHEREOF, I (we) have hereto set my (our) hand(s) and seal(s) this 18th day of August, 2008.

20150316000080120 3/16 \$59.00
Shelby Cnty Judge of Probate, AL
03/16/2015 09:34:00 AM FILED/CERT

EXHIBIT A TO NOTICE OF LISE PENDENS

"EXHIBIT A"

20080818000331310 3/6 \$27.00
Shelby Cnty Judge of Probate, AL
08/18/2008 12:45:46PM FILED/CERT

PARCEL A

The NW 1/4 of the NE 1/4 of Section 36, Township 18 South, Range 1 East, Shelby County, Alabama.

This conveyance includes an easement for ingress and egress over and across existing road across SW 1/4 of the NE 1/4, Section 36, Township 18 South, Range 1 East, to Shelby County road #55.

PARCEL B

TRACT I: SW 1/4 of NE 1/4 of Section 36, Township 18 South, Range 1 East, Shelby County, Alabama.

TRACT II: A part of the NW 1/4 of SE 1/4 of Section 36, Township 18 South, Range 1 East, more particularly described as follows: Commencing at the N.E. corner of said 1/4-1/4 Section and run West 434 feet for point of beginning; thence continue West along North boundary of said 1/4-1/4 Section 600 feet; thence turn left 90 deg. and run South 160 feet; thence turn left 90 deg. and run East 400 feet; thence turn left and run northeasterly in a straight line 256.13 feet to point of beginning. Situated in Shelby County, Alabama.

PARCEL C

The SE 1/4 of NW 1/4 of Section 36, Township 18 South, Range 1 East, Shelby County, Alabama.

This conveyance includes an easements for ingress and egress over and across existing road across SW 1/4 of NE 1/4, Section 36, Township 18 South, Range 1 East, to Shelby County road #55.

- SUBJECT TO :
- (1) Ad Valorem taxes for the current year.
 - (2) Rights of way of transmission lines of record.
 - (3) To easements for ingress and egress to lands East and West of the above described lands, along existing road through said land and rights of other parties to use of said easements.
 - (4) Fence Northwest of the Southeast side of Tract II as shown by survey of Artis D. Coggins dated June, 1980.

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Exhibit 'B'

20080818000331310 4/6 \$27.00
Shelby Cnty Judge of Probate, AL
08/18/2008 12:45:48PM FILED/CERT

Parcel I:

The west 9.90 acres of the SW $\frac{1}{4}$ of NW $\frac{1}{4}$; Section 36, Township 18 Range 1 East, more particularly described as follows:

Begin at the northwest corner of said quarter-quarter Section and run east along the north line of said quarter-quarter Section a distance of 340.54 feet; thence turn right 89 degrees 09 minutes 04 seconds and run south a distance of 1284.45 feet to the south line of said quarter-quarter Section; thence turn right 90 degrees 08 minutes 26 seconds and run west along the south line of said quarter-quarter Section a distance 329.80 feet to the southwest corner of said quarter-quarter Section; thence turn right 89 degrees 23 minutes and run north along the west line of said quarter-quarter Section distance of 1288.73 feet to the point of beginning.

This conveyance includes an easement for ingress and egress over and across existing road across SW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, SW $\frac{1}{4}$ of NE $\frac{1}{4}$, Section 36, Township 18 South, Range 1 East to Shelby County Road #55.

Parcel II:

The East 29.50 acres of the SW $\frac{1}{4}$ of NW $\frac{1}{4}$, Section 36, Township 18, Range 1 East, more particularly described as follows: Begin at the northeast corner of said quarter-quarter section, and run west along the north line of said quarter-quarter Section a distance of 1021.63 feet; thence turn left 90 degrees 50 minutes 56 seconds and run south a distance of 1284.45 feet to the south line of said quarter-quarter Section; thence turn left 89 degrees 51 minutes 34 seconds and run east along the south line of said quarter-quarter Section a distance of 989.38 feet to the southeast corner of said quarter-quarter Section; thence turn left 88 degrees 41 minutes 35 seconds and run north along the east line of said quarter-quarter Section a distance of 1272.15 feet to the point of beginning.

This conveyance includes an easement for ingress and egress over and across existing road, across SW $\frac{1}{4}$ of NW $\frac{1}{4}$ and the SW $\frac{1}{4}$ of NE $\frac{1}{4}$ of Section 36, Township 18 South, Range 1 East to Shelby County Road #55.

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Exhibit 'C'


Legal Description

Property situated partly in the NE1/4 of the SW1/4 and partly in the NW1/4 of the SE1/4 of Sec.36-T18S-R1E and being more particularly described as follows:

Commence at the NW Cor. of the NE1/4 of the SW1/4 of said section and run N89-30-00E along the north line of said 1/4-1/4 a distance of 1134.63 ft. to the point of beginning; thence, run N89-03-28E 185.14 feet; thence, run N89-25-43E 196.01 ft.; thence, run S03-35-35W 173.98 ft.; thence, run N88-39-29E 48.37 ft.; thence, run S29-15-43W 200.67 ft.; thence, run S86-54-12E 268.90 ft. to the north side of Merryhill Farm Road; thence, run S63-22-09E 62.58 ft. to the south side of Merryhill Farm Road; thence, run S28-52-46W 1021.50 ft.; thence, run S86-39-43W 457.56 ft.; thence, run S89-48-21W 473.52 ft.; thence, run N00-57-00W 10.29 ft. to the centerline of Merryhill Farm Road; thence, run N89-48-21E along said centerline 247.94 ft.; thence, run S89-04-16E along said centerline 145.93 ft. to the PC of a curve to the left having a radius of 94.00 ft. and a delta of 69-04-00; thence, run along said curve 113.31 ft. to the PT of said curve; thence, run N21-51-44E along said centerline 50.75 ft. to a curve to the right having a radius of 566.69 ft. and a delta of 16-46-00; thence, run along said curve 165.83 ft. to the PT of said curve; thence, run N38-37-44E along said centerline 49.45 ft.; thence, run N43-19-03E along said centerline 303.71 ft.; thence, run N07-11-47W 176.62 ft.; thence, run N02-08-11W 615.81 ft. to the point of beginning.
Containing 13.48 acres.


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EXHIBIT 'D'
LEGAL DESCRIPTION


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Shelby Cnty Judge of Probate, AL
08/18/2008 12:45:46PM FILED/CERT

A part of the $\frac{1}{4}$ of the NE $\frac{1}{4}$ of section 36, Township 18 South, Range 1 East, and described as follows: Begin at the NW corner of said $\frac{1}{4}$ - $\frac{1}{4}$ section, thence North $87^{\circ}48'$ East a distance of 356.70 feet; thence South $69^{\circ}24'$ East a distance of 281.65 feet to the West right-of-way line of Highway #55; thence South $22^{\circ}04'$ West along said right-of-way a distance of 803.95 feet to the point of a curve to the right having a central angle of $23^{\circ}48'$, a radius of 1287.73 feet; thence along the arc of said curve a distance of 534.91 feet to the West line of said $\frac{1}{4}$ - $\frac{1}{4}$ section; thence North $1^{\circ}23'$ East along said West line a distance of 1274.79 feet to the point of beginning; being situated in Shelby County, Alabama.

Subject to easements and restrictions of record, and current state, county and city taxes.


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Shelby Cnty Judge of Probate, AL
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WARRANTY DEED

20081218000470200 1/2 \$16.00
Shelby Cnty Judge of Probate, AL
12/18/2008 03:23:29PM FILED/CERT

STATE OF ALABAMA }
SHELBY COUNTY }

KNOW ALL MEN BY THESE PRESENTS:

That in consideration of One Thousand and No/100 (1000.00) Dollars cash to the undersigned Grantor (whether one or more), in hand paid by the GRANTEE herein, the receipt hereof is acknowledged, I Perry E. Cox, Sr. Trustee of the Trust Estate Of JoAnne Cox (herein referred to as GRANTOR, grant, bargain, sell and convey unto COUNTRY HILLS ESTATE, a General Partnership - Perry E. Cox, Sr.; Perry E. Cox, Jr. (herein referred to as GRANTEE, whether one or more), the following described real estate, situated in Shelby County, Alabama (the "Property"), to-wit:

Lot 2 in Country Hills Family Subdivision - a single family residential subdivision - situated in the SW 1/4 of the NE 1/4 of Section 35, Township 18 South, Range 1 East, as recorded in Map Book 16, Page 19 in the Probate Office of Shelby County, Alabama

Source of Title: Instrument # 1995-25178

TO HAVE AND TO HOLD the Property to the said GRANTEE, his, her or their heirs and assigns forever.

And I (we) do, for myself (ourselves) and for my (our) heirs, executors and administrators, covenant with said Grantee, his, her or their heirs and assigns, that I am (we are) lawfully seized in fee simple of said premises; that they are free from all encumbrances, unless otherwise stated above; that I (we) have a good right to sell and convey the same as aforesaid; that I (we) will, and my (our) heirs, executors and administrators shall warrant and defend the same to the said Grantee, His, her or their heirs and assigns forever, against the lawful claims of all persons.

IN WITNESS WHEREOF, I (we) have hereto set my (our) hand(s) and seal(s) this 18th day of December 2008.



Perry Eugene Cox, Sr., as Trustee of
The Trust of JoAnne F. Cox

I, the undersigned authority, a Notary Public in and for the State of Alabama, hereby certify that Perry Eugene Cox, Sr. whose name is signed to the foregoing conveyance, and who are is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

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Shelby Cnty Judge of Probate, AL
03/16/2015 09:34:00 AM FILED/CERT

EXHIBIT B TO NOTICE OF LIS PENDENS

IN THE PROBATE COURT OF SHELBY COUNTY, ALABAMA

IN THE MATTER OF:

THE ESTATE OF PERRY EUGENE
COX, SR.,
DECEASED.

CASE NO:

PR-2013-000281

**MOTION FOR (A) INVENTORY OF ESTATE ASSETS; (B) PARTNERSHIP
ACCOUNTING; (C) PRODUCTION OF TAX RETURNS; AND
(D) POSTPONEMENT OF MEDIATION**

COME NOW Shirley Cox Wise, Debra Cox McCurdy and Jennie Jo Cox Parrish, the daughters of the Decedent who are three of the four beneficiaries of the above-referenced estate (the "Daughter Beneficiaries"), and hereby move the Court to enter an order or orders providing the following relief: (a) a complete inventory of the estate's assets; (b) an accounting of the books and accounts of a certain partnership in which the Decedent was a partner; (c) the production of state and federal tax returns and associated papers filed by or on behalf of the Decedent and one of the co-executors of the estate; and (d) the postponement of Court-ordered mediation among the beneficiaries until such time as full information about the estate has been provided to the Daughter Beneficiaries. As grounds for their motion and the relief they seek, the Daughter Beneficiaries state the following:

**NEWLY DISCOVERED EVIDENCE OF WRONGDOING
BY CO-PERSONAL REPRESENTATIVE**

1. The Daughter Beneficiaries have recently obtained additional, documentary evidence of serious wrongdoing involving the Decedent's estate on the part of its co-personal representative, Perry E. Cox, Jr. ("Buddy Cox"). Buddy Cox is also the fourth beneficiary under the Decedent's will.

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Shelby Cnty Judge of Probate, AL
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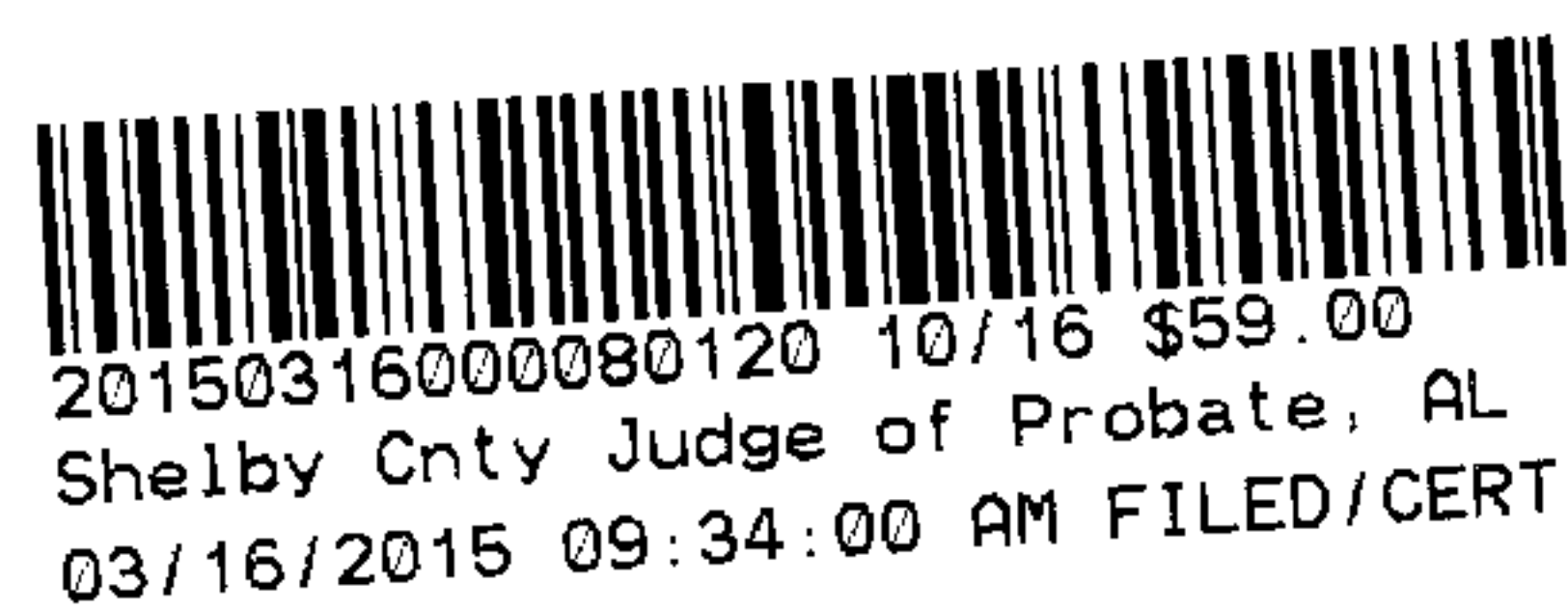
Filed in open court this
16 day of December, 2014.
Kimberly M. Nelson
(Judge of Probate) (Clerk)

EXHIBIT C to NOTICE OF LIS PENDENS

2. At his deposition, Buddy Cox repeatedly misrepresented under oath that he, not the Decedent, is the owner of commercial property located at 9115 Parkway East in Birmingham, Alabama. Deposition of Perry Eugene Cox, Jr. (the "Buddy Cox Dep.") at pp. 19, 66, 127-28, 218. Buddy Cox testified, incorrectly, that the Decedent owned only an adjoining parking lot, 9119 Parkway East. Buddy Cox Dep. at pp. 128, 218. Buddy Cox also incorrectly testified that he, Buddy Cox, was the lessor of the 9115 Parkway East property under agreements with certain tenants, and that he, Buddy Cox, received the rent from those leases. Buddy Cox Dep. at pp. 22, 24, 63, 64, 66, 126-29, 188-89. Excerpts of Buddy Cox's September 23, 2014, deposition testimony are attached hereto as Exhibit A.

3. As shown by new reports prepared by Common Bond Title, LLC, the Decedent, not Buddy Cox, holds legal title to 9115 Parkway East. The Decedent also is the holder of record title to 9119 Parkway East. See Exhibit B hereto (Common Bond Title, LLC, reports dated December 15, 2014).

4. Leases produced in civil actions in the Circuit Court of Jefferson County, and a sworn statement by Buddy Cox that was filed in one of those actions, establish that the Decedent, not Buddy Cox, was the lessor of 9115 Parkway East. See Exhibit C hereto (lease dated April 22, 2005, produced in *Perry Cox v. T & S Enterprises*, Civil Action No. CV-06-3500, Circuit Court of Jefferson County); Exhibit D hereto (lease dated July 31, 2008, produced in *Perry Cox v. Carl Christian et al.*, Civil Action No. CV-2009-902276, Circuit Court of Jefferson County); Exhibit E hereto (Affidavit of Perry Cox, Jr., Agent of Plaintiff Perry Cox, Sr., filed in *Perry Cox v. T & S Enterprises*). As Buddy Cox himself testified under oath: "My father [the Decedent] signed a lease for certain property located at 9115 Parkway East, Birmingham, Alabama, 35206. . . . I acted as his agent" Exhibit E ¶¶ 3, 4.



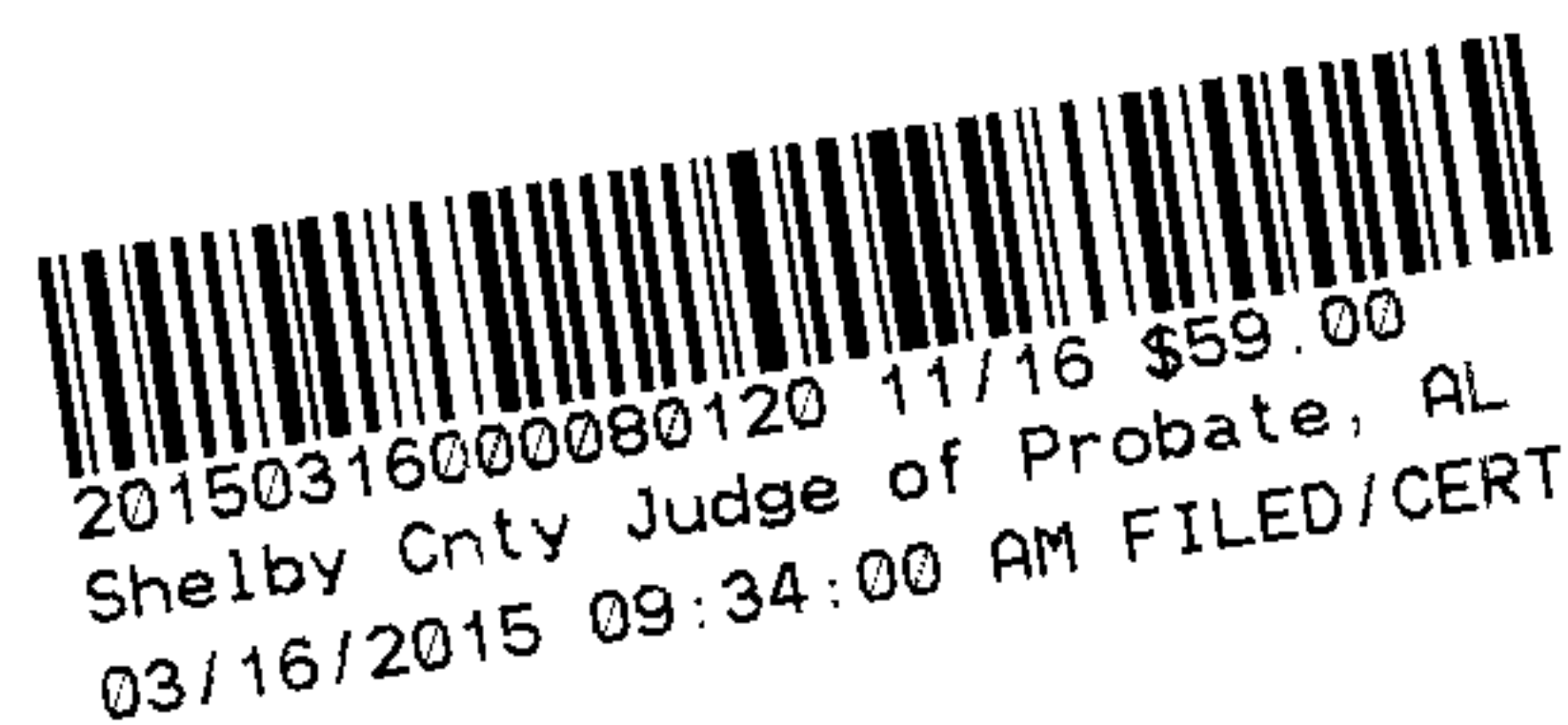
5. Jefferson County property tax records show that the Decedent received property tax notices for 9115 Parkway East at his home address (41 Country Hills Lane, Sterrett, Alabama) until his death in 2013. *See* Exhibit F hereto (property tax printouts).

6. Eleven days after the Decedent's death, Buddy Cox contacted the Jefferson County Tax Assessor's Office by e-mail, represented that he was "Perry Cox," and directed that all future notices regarding 9115 Parkway East be mailed to Buddy Cox's office address--One Country Ridge, Sterrett, Alabama—rather than to the Decedent's home address. Buddy Cox did not give similar instructions with regard to tax notices pertaining to 9119 Parkway East, which have continued to be directed to the Decedent's home address at 41 Country Hills Lane. It is apparent that, by changing the address for notices regarding 9115 Parkway East, Buddy Cox sought to prevent his co-personal representative and other beneficiaries from seeing that 9115 Parkway East was also owned by the Decedent.

7. According to 2014 property tax records, the 9115 Parkway East property that Buddy Cox claimed as his own is valued at \$374,160, while the 9119 Parkway East property is valued at \$122,240.

8. Buddy Cox has continued to resist all requests to provide complete and accurate information about the assets in the Decedent's estate. Among other things, Buddy Cox has refused to commission a statewide title search for property owned by the Decedent—which would have revealed the truth about the Decedent's ownership of 9115 Parkway East.

9. Buddy Cox obtained *50 (fifty)* death certificates as proof of the Decedent's death. Although he has been asked, Buddy Cox has yet to account for all 50 death certificates or to provide a reasonable explanation for why such a large number of certificates was necessary.



10. Particularly in light of the new evidence of Buddy Cox's misrepresentations about the ownership and leasing of the 9115 Parkway East property, as well as his conduct as co-personal representative in other regards, the Daughter Beneficiaries require the intervention of the Court to ensure that the Decedent's estate is accurately disclosed and fairly distributed.

INVENTORY OF ESTATE ASSETS

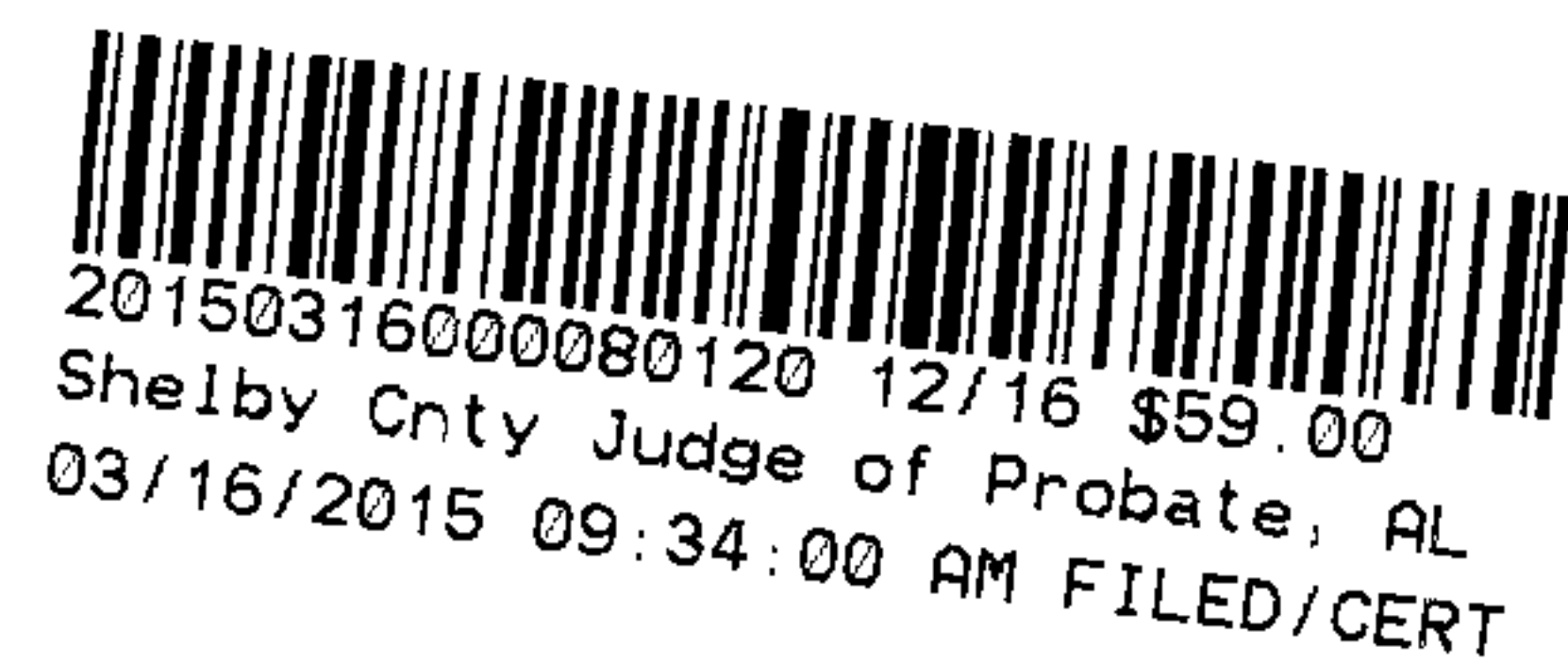
11. Item IX (b) of the Decedent's Last Will and Testament relieves the co-personal representatives of any duty to file an inventory of the estate with the Court, but it nevertheless requires them to "make out and keep an inventory and . . . exhibit the same to any party in interest at any reasonable time."

12. The Daughter Beneficiaries, as parties in interest, request that the Court direct Buddy Cox to cooperate with the co-personal representative, William D. Wise, to prepare a complete inventory of all estate assets. Among other measures, the preparation of such an inventory should include title searches in Alabama and other states in which the Decedent may have owned property, and documentation concerning Buddy Cox's use of the 50 death certificates mentioned in paragraph 9 above.

PARTNERSHIP ACCOUNTING

13. The Decedent was a partner in a general partnership called Country Hills Estate. Buddy Cox also was a partner in Country Hills Estate.

14. Upon the Daughter Beneficiaries' information and belief, Country Hills Estate holds approximately ~~360~~³⁶ acres of land. Buddy Cox has alleged that, under a survivorship provision in the Country Hills Estate partnership agreement, he is entitled to buy the Decedent's interest in the partnership for less than \$72,000.00, which would be only a small fraction of the value of the partnership's holdings.



15. Buddy Cox and the tax preparer on whom he relied for the alleged purchase price have been unable to provide evidence of the accuracy or validity of the \$72,000.00 figure.

16. The Daughter Beneficiaries do not concede that Buddy Cox properly invoked the survivorship provision in the partnership agreement. If and when the survivorship provision were properly exercised, a complete accounting of the partnership's partner contributions, as well as profits and losses, would be required to determine a valid purchase price under the formula established by the agreement.

PRODUCTION OF TAX RETURNS

17. In light of Buddy Cox's testimony, in which he alleged a co-mingling of his assets with those of the Decedent, Buddy Cox's tax returns are relevant to the determination of the assets in the Decedent's estate, and to evaluate the accuracy of information provided by Buddy Cox. The Daughter Beneficiaries join in the Motion to Compel Production of Documents that was served on October 10, 2014, by co-personal representative William D. Wise.

18. The Decedent's complete personal tax returns also are needed for the determination of the true assets of the estate and to confirm or refute representations by Buddy Cox concerning the Decedent's property interests. Therefore, the Daughter Beneficiaries request the Court's leave to obtain the issuance of a subpoena to Herb Metcalf, Jr., Certified Public Accountant, for all tax returns, forms and schedules and all other documents relating to the Decedent.

POSTPONEMENT OF MEDIATION

19. Before the Daughter Beneficiaries can engage in a productive mediation, they must have confidence that they have accurate knowledge of the assets that are properly included in the Decedent's estate.

20. To date, the inconsistencies and misrepresentations in Buddy Cox's testimony about the estate, and the gross inadequacy of the information that the Daughter Beneficiaries have otherwise received, would greatly prejudice them in any settlement discussions. Mediation would not be worthwhile or fair for the Daughter Beneficiaries under the present circumstances.

21. The Daughter Beneficiaries have previously joined in the request by co-personal representative William D. Wise for the removal of Buddy Cox as a co-personal representative. The new evidence about the Decedent's ownership of 9115 Parkway East and Buddy Cox's attempts to conceal the truth about the property further supports the removal of Buddy Cox as a co-personal representative of the estate. His removal should occur before the beneficiaries attempt to mediate the distribution of the estate itself.

22. The Daughter Beneficiaries were unaware that mediation was proposed by the Court at an October hearing until after their previous counsel had already responded in the affirmative. Given Buddy Cox's conduct and their unsuccessful attempts to obtain facts about the estate's assets, the Daughter Beneficiaries feel strongly that the time is not yet ripe for mediation.

23. For all of the above reasons, the Daughter Beneficiaries respectfully submit that mediation should be postponed until such time as they can be adequately prepared to address the issues with sufficient knowledge about the estate.

WHEREFORE, the premises considered, the Daughter Beneficiaries pray that the Court (a) order the making and production of a complete inventory of the assets of the Decedent's estate; (b) order a full accounting of the contributions, profits and losses of the Country Hills Estate partnership; (c) order the production of certain tax returns and related documents of Buddy Cox and the Decedent; and (d) postpone mediation until such time as the Daughter Beneficiaries have been provided full and complete information about the assets of the estate.

Respectfully submitted,



Randall D. Quarles (QUA006)




Frances P. Quarles (QUA011)

Attorneys for Shirley Cox Wise, Debra Cox
McCurdy and Jennie Jo Cox Parris

OF COUNSEL:

QUARLES LAW FIRM, LLC
300 Office Park Drive, Suite 100
Mountain Brook, AL 35223
Telephone: (205) 874-7000
Telecopier: (205) 874-7002
rquarles@quarleslawfirm.com
fqarles@quarleslawfirm.com



20150316000080120 15/16 \$59.00
Shelby Cnty Judge of Probate, AL
03/16/2015 09:34:00 AM FILED/CERT

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Motion for (a) Inventory of Estate Assets; (b) Partnership Accounting; (c) Production of Tax Returns; and (d) Postponement of Mediation by placing a copy of the same in the United States Mail, first-class postage prepaid and properly addressed, as follows:

Lewis B. Feld, Esq.
DOMINICK FELD HYDE
1130 22nd Street South
Ridge Park, Suite 4000
Birmingham, AL 35205

I further certify that I served copies of the same by hand delivery on counsel for co-personal representative William D. Wise and counsel for co-personal representative Perry E. Cox, Jr., at the Shelby County Courthouse, as follows:

Counsel for William D. Wise

Larry B. Childs, Esq., or Michael A. Fant, Esq.
WALLER LANSDEN DORTCH & DAVIS, LLP
1901 Sixth Avenue North, Suite 1400
Birmingham, AL 35203


Counsel for Perry E. Cox, Jr.

Joseph A. Fawal, Esq.
FAWAL & SPINA
1330 21st Way South, Suite 200
Birmingham, AL 35205

or John E. Medaris, Esq.
230 Bearden Rd
Pelham, AL 35124

This the 16th day of December, 2014.


OF COUNSEL


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Shelby Cnty Judge of Probate, AL
03/16/2015 09:34:00 AM FILED/CERT