

IN THE CIRCUIT COURT OF SHELBY COUNTY, ALABAMA

PAMELA CONWAY,

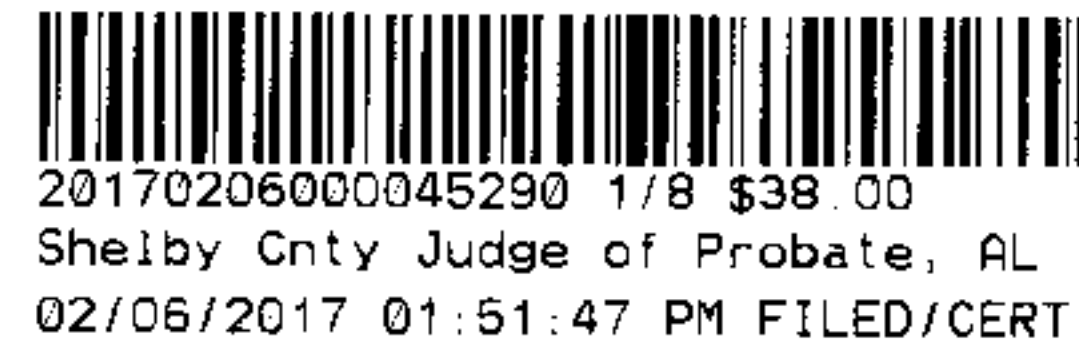
Plaintiff,

v.

JESSE W. MARKS and his Heirs
or Devisees, if deceased, and
JAMIE MARKS and her Heirs or
Devisees, if deceased, and
RUBY G. MARKS and her
Heirs or Devisees, if deceased, and
HERBERT R. MARKS, and his Heirs
or Devisees, if deceased, and
FICTITIOUS DEFENDANTS A through
Z, Being those persons or entities claiming
an interest in certain real property located
in St. Clair County, Alabama, being more
particularly described below:

A part of the SE 1/4 of SE 1/4 of Section
27, Township 17 South, Range 1 East and
a part of the NE 1/4 of NE 1/4 of Section
34, Township 17 South, Range 1 East
being more particularly described as
follows: Begin at a 3" Capped Pipe,
being the SE corner of the SE 1/4 of SE
1/4 of Section 27, Township 17 South,
Range 1 East; Thence S 00 Deg. 08' 17"
W, along the East line of the NE 1/4 of
NE 1/4 of Section 34, Township 17
South, Range 1 East, 248.01 Feet to a
1/2" Rebar on the Norther Right of
Way line of Hwy. #101; Thence S 82
Deg. 40' 28" W, along said right of way
of said road, 46.39 Feet to a Concrete
Monument and the Point of a Curve to
the Right having a central angle of 143
Deg. 46' 43" and a Radius of 216.02
Feet; Thence along the Arc of said Curve)

Case Number: CV-2017-900073.00



and said Right of Way of said Road)
 Northwesterly and Northeasterly)
 542.09 Feet to the Point of Tangent;)
 Thence N 46 Deg. 27' 11" E along the)
 Southeastern Right of Way of said Road)
 310.18 Feet to a 1/2" Rebar on the East)
 Line of the SE 1/4 of SE 1/4 of Section)
 27, Township 17 South, Range 1 East;)
 Thence S 00 Deg. 19' 07" W, along the)
 East Line of said 1/4 1/4 Section, 330.61)
 Feet to the Point of Beginning.)
 Containing 2.720 Acres, Subject to all)
 Easements recorded and unrecorded.)
)
)
)
 Defendants.)

NOTICE OF LIS PENDENS

State of Alabama }
 Shelby County }

Notice is hereby given that **Pamela Conway** commenced a civil action against **JESSE W. MARKS** and his heirs or devisees, if deceased, **JAMIE MARKS**, **RUBY G. MARKS** and her heirs or devisees, if deceased, **HERBERT R. MARKS** and his heirs or devisees, if deceased, and the fictitious Defendants A through Z on the 23rd day of January, 2017, in which **Pamela Conway** claims right, title, interest, or claim in and to the following property situation in Shelby, Alabama:

A part of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East and a part of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East being more particularly described as follows: Begin at a 3" Capped Pipe, being the SE corner of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 08' 17" W, along the East line of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East, 248.01 Feet to a 1/2" Rebar on the Norther Right of Way line of Hwy. #101; Thence S 82 Deg. 40' 28" W, along said right of way of said road, 46.39 Feet to a Concrete Monument and the Point of a Curve to the Right having a central angle of 143 Deg. 46' 43" and a Radius of 216.02 Feet; Thence along the Arc of said Curve and said Right of Way of said Road Northwesterly and Northeasterly 542.09 Feet to the Point of Tangent;


Thence N 46 Deg. 27' 11" E along the Southeastern Right of Way of said Road 310.18 Feet to a 1/2" Rebar on the East Line of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 19' 07" W, along the East Line of said 1/4 1/4 Section, 330.61 Feet to the Point of Beginning. Containing 2.720 Acres, Subject to all Easements recorded and unrecorded.

Shelby Clair County Tax Parcel ID Number: 01-8-27-0-000-002.002

Commonly Known as: 55 Sand Ridge Road, Leeds, Alabama 35094

1. The Plaintiff listed herein has, since 2010, been in actual, peaceable, open, notorious, and adverse possession of the following described properties, claiming to own the same, being the same properties described in the caption of this pleading and have held and do still hold color of title to the said lands, being the fee simple interest therein so claimed and Plaintiff have duly assessed and paid Ad Valorem taxes on the same properties during Plaintiff's period of ownership which exceeds 6 years. The properties being further described as follows:

A part of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East and a part of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East being more particularly described as follows: Begin at a 3" Capped Pipe, being the SE corner of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 08' 17" W, along the East line of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East, 248.01 Feet to a 1/2" Rebar on the Norther Right of Way line of Hwy. #101; Thence S 82 Deg. 40' 28" W, along said right of way of said road, 46.39 Feet to a Concrete Monument and the Point of a Curve to the Right having a central angle of 143 Deg. 46' 43" and a Radius of 216.02 Feet; Thence along the Arc of said Curve and said Right of Way of said Road Northwesterly and Northeasterly 542.09 Feet to the Point of Tangent; Thence N 46 Deg. 27' 11" E along the Southeastern Right of Way of said Road 310.18 Feet to a 1/2" Rebar on the East Line of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 19' 07" W, along the East Line of said 1/4 1/4 Section, 330.61 Feet to the Point of Beginning. Containing 2.720 Acres, Subject to all Easements recorded and unrecorded.


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2. JESSE W. MARKS and his heirs or devisees, if deceased, claim some lien, right,

title, or interest in:

A part of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East and a part of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East being more particularly described as follows: Begin at a 3" Capped Pipe, being the SE corner of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 08' 17" W, along the East line of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East, 248.01 Feet to a 1/2" Rebar on the Norther Right of Way line of Hwy. #101; Thence S 82 Deg. 40' 28" W, along said right of way of said road, 46.39 Feet to a Concrete Monument and the Point of a Curve to the Right having a central angle of 143 Deg. 46' 43" and a Radius of 216.02 Feet; Thence along the Arc of said Curve and said Right of Way of said Road Northwesterly and Northeasterly 542.09 Feet to the Point of Tangent; Thence N 46 Deg. 27' 11" E along the Southeastern Right of Way of said Road 310.18 Feet to a 1/2" Rebar on the East Line of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 19' 07" W, along the East Line of said 1/4 1/4 Section, 330.61 Feet to the Point of Beginning. Containing 2.720 Acres, Subject to all Easements recorded and unrecorded.

3. JAMIE MARKS claims some lien, right, title, or interest in:

A part of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East and a part of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East being more particularly described as follows: Begin at a 3" Capped Pipe, being the SE corner of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 08' 17" W, along the East line of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East, 248.01 Feet to a 1/2" Rebar on the Norther Right of Way line of Hwy. #101; Thence S 82 Deg. 40' 28" W, along said right of way of said road, 46.39 Feet to a Concrete Monument and the Point of a Curve to the Right having a central angle of 143 Deg. 46' 43" and a Radius of 216.02 Feet; Thence along the Arc of said Curve and said Right of Way of said Road Northwesterly and Northeasterly 542.09 Feet to the Point of Tangent; Thence N 46 Deg. 27' 11" E along the Southeastern Right of Way of said Road 310.18 Feet to a 1/2" Rebar on the East Line of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 19' 07" W, along the East Line of said 1/4 1/4 Section, 330.61 Feet to the Point of Beginning. Containing 2.720 Acres, Subject to all Easements recorded and unrecorded.

4. RUBY G. MARKS and his heirs or devisees, if deceased, claim some lien,


right, title, or interest in:

A part of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East and a part of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East being more particularly described as follows: Begin at a 3" Capped Pipe, being the SE corner of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 08' 17" W, along the East line of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East, 248.01 Feet to a 1/2" Rebar on the Norther Right of Way line of Hwy. #101; Thence S 82 Deg. 40' 28" W, along said right of way of said road, 46.39 Feet to a Concrete Monument and the Point of a Curve to the Right having a central angle of 143 Deg. 46' 43" and a Radius of 216.02 Feet; Thence along the Arc of said Curve and said Right of Way of said Road Northwesterly and Northeasterly 542.09 Feet to the Point of Tangent; Thence N 46 Deg. 27' 11" E along the Southeastern Right of Way of said Road 310.18 Feet to a 1/2" Rebar on the East Line of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 19' 07" W, along the East Line of said 1/4 1/4 Section, 330.61 Feet to the Point of Beginning. Containing 2.720 Acres, Subject to all Easements recorded and unrecorded.

5. HERBERT R. MARKS and his heirs or devisees, if deceased, claim some lien,

right, title, or interest in:

A part of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East and a part of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East being more particularly described as follows: Begin at a 3" Capped Pipe, being the SE corner of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 08' 17" W, along the East line of the NE 1/4 of NE 1/4 of Section 34, Township 17 South, Range 1 East, 248.01 Feet to a 1/2" Rebar on the Norther Right of Way line of Hwy. #101; Thence S 82 Deg. 40' 28" W, along said right of way of said road, 46.39 Feet to a Concrete Monument and the Point of a Curve to the Right having a central angle of 143 Deg. 46' 43" and a Radius of 216.02 Feet; Thence along the Arc of said Curve and said Right of Way of said Road Northwesterly and Northeasterly 542.09 Feet to the Point of Tangent; Thence N 46 Deg. 27' 11" E along the Southeastern Right of Way of said Road 310.18 Feet to a 1/2" Rebar on the East Line of the SE 1/4 of SE 1/4 of Section 27, Township 17 South, Range 1 East; Thence S 00 Deg. 19' 07" W, along the East Line of said 1/4 1/4 Section, 330.61 Feet to the Point of Beginning. Containing 2.720 Acres, Subject to all Easements recorded and unrecorded.


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6. Fictitious Defendants A through Z claim some form of lien, right, title, or interest in the properties described in paragraph 7.

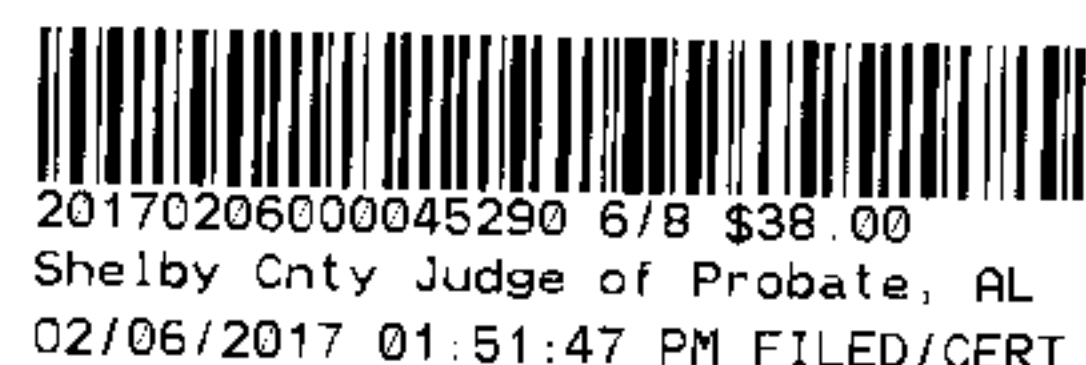
7. The Plaintiff herein denies and disputes any right, title, or interest of JESSE W. MARKS and his heirs or devisees, if deceased, JAMIE MARKS, RUBY G. MARKS and her heirs or devisees, if deceased, HERBERT R. MARKS and his heirs or devisees, if deceased, and the fictitious Defendants A through Z, whatsoever.

8. Plaintiff is unaware of any other person or entity who may claim any interest, lien, encumbrance, or right to such properties other than those named as Defendants herein.

9. The Plaintiff acquired title and does hold color of title to the above described property under and by virtue of the deeds recorded in the Office of the Judge of Probate of Shelby, County, Alabama in Instrument 20160610000202150 which was executed April 21st, 2014.

10. There is no other suit pending to test or to determine the title to or any interest in or right of possession of the Plaintiff in or to the said lands or any part thereof and that no suit is pending to test or determine any other title to, interest in, or right of possession of the said lands or any part thereof.

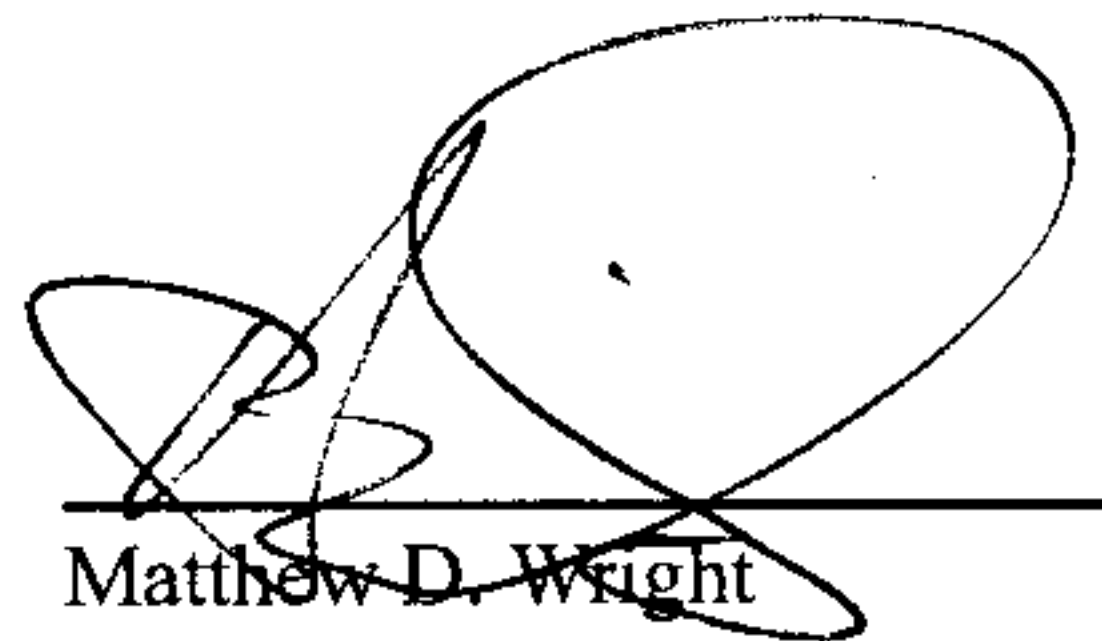
11. That the Defendants herein are those named above and the lands herein described and any and all parties including any persons claiming any present, future, contingent, reversionary, remainder, or other interest therein who may claim any interest in this property. Plaintiff is not aware of any such persons who make any such claims who are not individually named herein as Defendants.



12. Plaintiff calls upon the Defendants named herein to set forth and specify their proper lien, right, title, or interest and state how and by what instrument it is derived and created herein, if any.

13. The Plaintiff stands ready to do equity.

RESPECTFULLY SUBMITTED on this 31st day of January, 2017.



Matthew D. Wright
Attorney for Plaintiff


OF COUNSEL:

Matthew D. Wright
Attorney At Law
The Wright Law Firm, P.C.
3644 Vann Road, Suite 128
The Trussville Design Center
Birmingham, Alabama 35235
(205) 836-1224

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing to all parties listed below by facsimile transmittal, e-filing in the alafile.com system, or by placing a copy of the same in the United States Mail, First Class Postage Pre-paid and properly addressed this the 31st day of January, 2017


Inmate JAMIE MARKS
C/o Warden D. Wright
Tutwiler Prison for Women
8966 US Hwy 231 N
Wetumpka AL 36092



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A handwritten signature in black ink, appearing to read 'Matthew D. Wright', is written over a horizontal line.

Matthew D. Wright
Attorney for Plaintiff

A standard 1D barcode with vertical black bars of varying widths on a white background.

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