

Tennessee Judicial Nominating Commission
Application for Nomination to Judicial Office

Rev. 14 September 2011

Name: Keith Alan Turner

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INTRODUCTION

Tennessee Code Annotated section 17-4-101 charges the Judicial Nominating Commission with assisting the Governor and the People of Tennessee in finding and appointing the best qualified candidates for judicial offices in this State. Please consider the Commission's responsibility in answering the questions in this application questionnaire. For example, when a question asks you to "describe" certain things, please provide a description that contains relevant information about the subject of the question, and, especially, that contains detailed information that demonstrates that you are qualified for the judicial office you seek. In order to properly evaluate your application, the Commission needs information about the range of your experience, the depth and breadth of your legal knowledge, and your personal traits such as integrity, fairness, and work habits.

This document is available in word processing format from the Administrative Office of the Courts (telephone 800.448.7970 or 615.741.2687; website <http://www.tncourts.gov>). The Commission requests that applicants obtain the word processing form and respond directly on the form. Please respond in the box provided below each question. (The box will expand as you type in the word processing document.) Please read the separate instruction sheet prior to completing this document. Please submit the completed form to the Administrative Office of the Courts in paper format (with ink signature) **and** electronic format (either as an image or a word processing file and with electronic or scanned signature). Please submit seventeen (17) paper copies to the Administrative Office of the Courts. Please e-mail a digital copy to debra.hayes@tncourts.gov

THIS APPLICATION IS OPEN TO PUBLIC INSPECTION AFTER YOU SUBMIT IT.

PROFESSIONAL BACKGROUND AND WORK EXPERIENCE

1. State your present employment.

Solo practioner, Keith A. Turner, Attorney at Law, 222 Second Avenue North, Suite 360-M, Nashville, Tennessee 37201, Telephone: (615) 234-3947, Facsimile: (615) 234-3948, email: keith@keithslawoffice.com

2. State the year you were licensed to practice law in Tennessee and give your Tennessee Board of Professional Responsibility number.

2000, BPR # 20545

3. List all states in which you have been licensed to practice law and include your bar number or identifying number for each state of admission. Indicate the date of licensure and whether the license is currently active. If not active, explain.

Tennessee, BPR # 20545, licensed May 5, 2000, Active

4. Have you ever been denied admission to, suspended or placed on inactive status by the Bar of any State? If so, explain. (This applies even if the denial was temporary).

No

5. List your professional or business employment/experience since the completion of your legal education. Also include here a description of any occupation, business, or profession other than the practice of law in which you have ever been engaged (excluding military service, which is covered by a separate question).

May 2000 - October 2001, Beck & Beck, Attorneys at Law, 4205 Gallatin Road, Nashville, Tennessee 37216, (615) 226-9000. Primary practice areas included Divorce and Chapter 7 and Chapter 13 Bankruptcy Debtors. Also represented clients in two suits for Partition, and one creditor client in enforcement and foreclosure of Deed of Trust.

September 2000 - May 2001, Davidson Academy, 1414 Old Hickory Boulevard, Nashville, Tennessee 37207, (615) 860-5300. Taught Practical Law class to high school students, one class period each school day. Course was designed to give students a practical understanding of law and our legal system, and was based upon the Street Law program that was begun by Georgetown Law Center in 1972.

October 2001 - June 2002, The Vision Insurance Group, P.O. Box 2128, Brentwood, Tennessee 37024-2128, (877) 584-7466. Employed to work in the claims department on matters related to resolving automobile accident claims against insureds, locating and arranging with local

attorneys to represent insureds in lawsuits related to automobile accidents, participating in arbitration and mediation related to claims against insureds, and participating in Judicial Settlement Conferences when the Court where a lawsuit had been filed against an insured required participation by a representative of the insurance company with settlement authority. Generally worked on matters related to automobile accident insurance claims when the claimant was represented by an attorney or a lawsuit had been filed against an insured. Vision sold automobile insurance in nine states, and insureds had accidents in several more.

June 2003 - September 2003, Security Title & Escrow Company, 750 Old Hickory Boulevard, Suite 165, Brentwood, Tennessee 37027, (615) 309-0909. Brought in to work on matters related to real estate closings, title commitments, and to resolve claims related to real estate closings that occurred prior to my relationship with company. This was a part-time employment relationship related to an immediate temporary need of Security Title & Escrow Company due to the departure their attorney.

July 2002 - Present, Keith A. Turner, Attorney at Law, 222 Second Avenue North, Suite 360-M, Nashville, Tennessee, 37201, (615) 234-3947. Primary practice areas have included: Family Law issues including divorce, child support, visitation, parentage, and contempt; Bankruptcy Law issues including Chapter 13 and Chapter 7 Debtors, and enforcement of creditor's claims and rights; Landlord matters including eviction of non-paying tenants, and collection of unpaid rents; Tenant matters including damage to and destruction of tenants personal property, and tenant disputes with landlord; Personal Injury matters including representing plaintiffs injured by careless and negligent drivers, and defendants sued by persons alleging that my client's driving had caused harm to them and their property; Business related matters including sub-contractor liens, collection of monies owed to sub-contractors and other businesses, negotiation with lender related to loans to the business, setting aside a Default Judgment against business for Personalty Taxes, disputes with business's creditors and suppliers, and Limited Liability Company formations; matters related to disputes between Business Co-Owners and persons alleged to be co-owners of businesses; matters related to disputes arising from the attempted sale of Real Estate, the sale of Real Estate, and the refinancing of Real Estate; Criminal Law matters including alleged assaults, thefts, and DUIs; Probate Law matters including Wills, Living Wills, Durable Powers of Attorney, Durable Powers of Attorney for Healthcare, representing petitioner in Petition for Conservatorship, representing petitioner in Petition for Guardianship, serving as court appointed Conservator, serving as court appointed Guardian Ad Litem in Conservatorships, serving as court appointed Attorney Ad Litem in Conservatorship case, serving as court appointed Attorney Ad Litem for Unknown Heirs at Law in an Estate, serving as court appointed Guardian Ad Litem for Unknown Heirs at Law in an Estate, representing Administrator in an Estate, representing Beneficiary in an Estate; representing defendants sued by creditors including credit card companies; representing plaintiffs owed monies by friends and co-workers; representing plaintiffs who had purchased items that did not perform as promised; representing plaintiff injured by food product; representing defendant in Order of Protection; and, representing plaintiffs in insurance related disputes.

After completing college, and prior to attending law school, was employed by Beaman Toyota in Nashville as a car salesman, employed by American General Life & Accident Insurance Company in Nashville as an insurance salesman, and was affiliated with Beck & Beck Realtors in Nashville as an affiliate Real Estate Broker and an apprentice Auctioneer.

Beginning in July 1994 and throughout law school, was employed by the law firm of Gullett, Sanford, Robinson & Martin in Nashville. Initially was hired as a runner/courier. After working for Gullett, Sanford, Robinson & Martin for about a year and a half, as the attorneys grew to trust me, my duties changed to law clerk/paralegal working primarily in the Business Reorganization and Bankruptcy Group. Several attorneys allowed me to work with them on matters related to Chapter 11 Reorganization and Business Bankruptcy, Federal and State Taxes, Business Formations, Bond Reissue and Financial Transactions, Creditor Debt Enforcement and Collection, Foreclosure, Business Litigation, Probate Matters, and General Litigation.

If you have not been employed continuously since completion of your legal education,
6. describe what you did during periods of unemployment in excess of six months.

After completing Law School, in addition to studying for the Bar exam, my activities included volunteering with charitable activities including the Room at the Inn at both First Baptist Church Nashville and St. Batholomew's Episcopal Church in Nashville, volunteering with other programs related to First Baptist Church Nashville, and working at the Tennessee Baptist Convention in Brentwood including assisting with editing the Annual Report of the Tennessee Baptist Convention. Also, there is a lady, who is a close family friend and whose husband died several years ago, who I had helped to maintain her yard for several years, and who I continued to help after I passed the Bar and was practicing law, until she sold her home.

Describe the nature of your present law practice, listing the major areas of law in which
7. you practice and the percentage each constitutes of your total practice.

Probate matters - 40%, Court Appointed Family Law matters - 5%, Business matters - 25%, Creditor matters - 10%, Debtor matters - 10%, Personal Injury Plaintiff - 10%.

8. Describe generally your experience (over your entire time as a licensed attorney) in trial courts, appellate courts, administrative bodies, legislative or regulatory bodies, other forums, and/or transactional matters. In making your description, include information about the types of matters in which you have represented clients (e.g., information about whether you have handled criminal matters, civil matters, transactional matters, regulatory matters, etc.) and your own personal involvement and activities in the matters where you have been involved. In responding to this question, please be guided by the fact that in order to properly evaluate your application, the Commission needs information about your range of experience, your own personal work and work habits, and your work background, as your legal experience is a very important component of the evaluation required of the Commission. Please provide detailed information that will allow the Commission to evaluate your qualification for the judicial office for which you have applied. The failure to provide detailed information, especially in this question, will hamper the evaluation of your application.

Criminal - Represented clients in minor criminal matters; none related to felony charges. Represented a client charged with assault in Rutherford County General Sessions Court, four

clients charged with DUI or DWI in Davidson County General Sessions Court, one client charged with assault in Davidson County General Sessions Court, one client charged with theft in Davidson County General Sessions Court, and more than fifty clients charged with Contempt of Court in Davidson County Juvenile Court.

Bankruptcy - Represented several Debtor clients in Chapter 7 and Chapter 13 Bankruptcy cases, however, have not filed any new Chapter 7 or 13 Bankruptcy cases for Debtor clients since the “new” bankruptcy law took effect in October 2005. Also, represented several Creditor clients in Bankruptcy cases.

Business - Have represented, and currently represent, several small business owners. A few clients are sub-contractors who I have assisted in getting paid, and a few clients have rental property and I have assisted in getting non-paying tenants out and collecting unpaid rents. I have assisted a few business clients related to setting up LLCs and drafting operating agreements. A few business clients have had issues related to monies alleged to be owed to creditors of the business, including trade creditors and banks, and a few business clients have had issues related to monies owed to their business. One business client had a default judgment entered against the business for personalty taxes and I was able to persuade the Court to set the default judgment aside. A few clients have had disputes with business partners and persons who alleged that they were business partners. Some clients have had someone allege that my client was obligated on a debt, or should be obligated to pay some or all of a debt.

Real Estate disputes - Represented clients in two suits for Partition, and one client in first trying to get the borrower to pay as they had promised in the promissory note, then foreclosure of the Deed of Trust when the borrower refused to pay. Co-represented intended Sellers in a lawsuits related to a contract to purchase their house, where the buyers failed to close the purchase, and the real estate agent had added some unusual language to the real estate contract. Co-represented Buyers of a home where the sellers did not disclose some defects. Co-represented a closing agent where claimants alleged defect in the closing.

Debtor v. Creditor - Represented several individual clients in disputes instituted by creditors.

Creditor v. Debtor - Represented several creditors in collection matters and in disputes with borrowers, including where borrowers alleged that creditor had acted improperly or failed to act properly.

Family Law - Represented clients in divorces, and in matters related to parentage issues, visitation issues, and child support issues. As is stated above, also represented more than fifty clients in Contempt cases.

Probate Law - Represented petitioner in Petition for Guardianship, petitioner in Petition for Conservatorship, represented administrator in Estate, represented beneficiary in Estate, served as court appointed Guardian Ad Litem in Conservatorships, served as court appointed Attorney Ad Litem in Conservatorship, served as court appointed Conservator, served as court appointed Attorney Ad Litem for Unknown Heirs at Law in Estate, served as court appointed Guardian Ad Litem for Unknown Heirs at Law in Estate, and worked with clients on estate planning matters.

Personal Injury - Represented Plaintiffs and Defendants in personal injury matters, including automobile accident cases.

General Litigation - Represented clients in matters related to insurance disputes, complaints related to products services purchased, claims for monies lent to friends and co-workers, and clients disputes with former friends.

9. Separately describe any matters of special note in trial courts, appellate courts, and administrative bodies.

Baugh v. Novak, Tennessee Court of Appeals, and Tennessee Supreme Court. Co-represented Mr. and Mrs. Novak.

10. If you have served as a mediator, an arbitrator or a judicial officer, describe your experience (including dates and details of the position, the courts or agencies involved, whether elected or appointed, and a description of your duties). Include here detailed description(s) of any noteworthy cases over which you presided or which you heard as a judge, mediator or arbitrator. Please state, as to each case: (1) the date or period of the proceedings; (2) the name of the court or agency; (3) a summary of the substance of each case; and (4) a statement of the significance of the case.

Have served as Special Referee/Magistrate for Juvenile Court for Davidson County several times beginning in 2003, and have requested from the Juvenile Court Clerk the dates and courtrooms of each. Served as Special Referee/Magistrate for Referee/Magistrate William P. Griffin, IV, Referee/Magistrate Shelia Callaway, Referee/Magistrate Sophia Crawford, and Referee/Magistrate W. Scott Rosenberg. Most of the matters heard were related to Petitions for Contempt for failure to comply with the court's child support order. The issues in the majority of cases heard were related to whether the respondent had willfully failed to comply with a valid court order. On some dates heard both a morning and afternoon docket, and on other dates heard only a morning or afternoon docket. On some dates the hearings were primarily to check whether the respondent was in compliance with an agreed contempt order or whether the respondent was indigent and desired to have the court appoint him or her an attorney. On other dates heard trials.

11. Describe generally any experience you have of serving in a fiduciary capacity such as guardian ad litem, conservator, or trustee other than as a lawyer representing clients.

In a Conservatorship for a lady (the "Ward"), the court initially appointed me to serve as Guardian Ad Litem to investigate matters related to the Ward's health, family, finances, residence, and proposed conservator, and to prepare a report for the court. During the course of my Guardian Ad Litem investigation, family members accused other family members of stealing or misappropriating money and assets from the Ward, and of moving or holding the Ward against her will. After a hearing with the family members present and represented by counsel, and with the agreement of counsel for the family members, the court appointed me to the additional role of Conservator of the property of the Ward. In the role of both Guardian Ad Litem and Conservator of the property of the Ward, my investigation included researching all of the Ward's investments and financial accounts. After researching the Ward's finances, and specifically searching for records and reviewing records directly related to the allegations of

family members, my review did not reveal any indication that any theft or misappropriation had occurred. The decline in the Ward's finances was largely due to the decline in value of an investment that had been made before the death of her spouse. The investment had declined in value since the death of her spouse. In the role as Conservator of the property of the Ward, monies the Ward had paid into an annuity were returned and the annuity contract cancelled. After meeting with the Ward's doctor and discussing her medical condition, meeting with family members and discussing what they believed the Ward's residential preferences had been and would be, meeting with the director of the facility where the Ward resided, and reviewing the Ward's finances, I believed the Ward would likely need the money invested in the annuity before the maturity date. Further, I believed that the Ward would be better protected from a potential loss of her money if the money was deposited in federally insured banks in amounts less than the insurance limit on deposits. After speaking with several bankers and discussing account options at their banks, the Ward's money was deposited with banks in amounts below the insurance limits. After serving as Conservator for the property of the Ward for approximately three months, and after a hearing before the court, the Petitioner was appointed as the Conservator for the person and the property of the Ward.

12. Describe any other legal experience, not stated above, that you would like to bring to the attention of the Commission.

None

13. List all prior occasions on which you have submitted an application for judgeship to the Judicial Nominating Commission or any predecessor commission or body. Include the specific position applied for, the date of the meeting at which the body considered your application, and whether or not the body submitted your name to the Governor as a nominee.

This is my first application for judgeship.

EDUCATION

14. List each college, law school, and other graduate school which you have attended, including dates of attendance, degree awarded, major, any form of recognition or other aspects of your education you believe are relevant, and your reason for leaving each school if no degree was awarded.

August 1981 - May 1982, Carson-Newman College, Jefferson City, Tennessee. General liberal arts studies, no declared major.

August 1982 - December 1983, Belmont College, Nashville, Tennessee. Part-time student, Business major.

May 1984 - July 1984, University of Texas at Arlington, Arlington, Texas. Part-time student, Accounting major.

August 1985 - June 1987, Carson-Newman College, Jefferson City, Tennessee. Economics and Business major. Served as Secretary and Treasurer of the Philomathean Literary Society.

August 1987 - May 1998, Belmont College, Nashville, Tennessee. Bachelor of Business Administration degree, Business and Economics major.

August 1994 - June 1998, Nashville School of Law, Nashville, Tennessee. Doctor of Jurisprudence degree.

PERSONAL INFORMATION

15. State your age and date of birth.

Age - 48, Date of Birth - July 26, 1963

How long have you lived continuously in the State of Tennessee?

16.

27 years.

How long have you lived continuously in the county where you are now living?

17.

24 years

State the county in which you are registered to vote.

18.

Davidson County, Tennessee

19. Describe your military Service, if applicable, including branch of service, dates of active duty, rank at separation, and decorations, honors, or achievements. Please also state whether you received an honorable discharge and, if not, describe why not.

Have not served in the military

20. Have you ever pled guilty or been convicted or are you now on diversion for violation of any law, regulation or ordinance? Give date, court, charge and disposition.

No

21. To your knowledge, are you now under federal, state or local investigation for possible violation of a criminal statute or disciplinary rule? If so, give details.

No

22. If you have been disciplined or cited for breach of ethics or unprofessional conduct by any court, administrative agency, bar association, disciplinary committee, or other professional group, give details.

Have never been disciplined or cited

23. Has a tax lien or other collection procedure been instituted against you by federal, state, or local authorities or creditors within the last five (5) years? If so, give details.

No

24. Have you ever filed bankruptcy (including personally or as part of any partnership, LLC, corporation, or other business organization)?

No

25. Have you ever been a party in any legal proceedings (including divorces, domestic proceedings, and other types of proceedings)? If so, give details including the date, court and docket number and disposition. Provide a brief description of the case. This question does not seek, and you may exclude from your response, any matter where you were involved only as a nominal party, such as if you were the trustee under a deed of trust in a foreclosure proceeding.

No

26. List all organizations other than professional associations to which you have belonged within the last five (5) years, including civic, charitable, religious, educational, social and fraternal organizations. Give the titles and dates of any offices which you have held in such organizations.

Member of First Baptist Church Nashville. Have also attended and participated in Rolling Hills Community Church in Franklin, Immanuel Baptist Church in Nashville, Forest Hills Baptist Church in Nashville, and Judson Baptist Church in Nashville. Currently attend and participate in Judson Baptist Church in Nashville. Honorable Order of Kentucky Colonels.

27. Have you ever belonged to any organization, association, club or society which limits its membership to those of any particular race, religion, or gender? Do not include in your answer those organizations specifically formed for a religious purpose, such as churches or synagogues.

a. If so, list such organizations and describe the basis of the membership limitation.

- b. If it is not your intention to resign from such organization(s) and withdraw from any participation in their activities should you be nominated and selected for the position for which you are applying, state your reasons.

No

ACHIEVEMENTS

28. List all bar associations and professional societies of which you have been a member within the last ten years, including dates. Give the titles and dates of any offices which you have held in such groups. List memberships and responsibilities on any committee of professional associations which you consider significant.

Nashville Bar Association - Memorial Service Committee, Historical Committee, Estate Planning and Probate Practice Committee, General Sessions Court Committee, Solo and Small Firm Committee. Served as Chairman of the Memorial Service Committee in 2010.

American Bar Association - Business Law, and Real Estate, Trust & Estate Law Sections

29. List honors, prizes, awards or other forms of recognition which you have received since your graduation from law school which are directly related to professional accomplishments.

None

30. List the citations of any legal articles or books you have published.

None

31. List law school courses, CLE seminars, or other law related courses for which credit is given that you have taught within the last five (5) years.

CLE, co-taught with Karl Warden a continuing legal education class for the Nashville Bar Association Young Lawyers Division related to practicing in areas outside of your specialty and experience.

32. List any public office you have held or for which you have been candidate or applicant. Include the date, the position, and whether the position was elective or appointive.

None

33. Have you ever been a registered lobbyist? If yes, please describe your service fully.

No

34. Attach to this questionnaire at least two examples of legal articles, books, briefs, or other legal writings which reflect your personal work. Indicate the degree to which each example reflects your own personal effort.

100%

ESSAYS/PERSONAL STATEMENTS

35. What are your reasons for seeking this position? *(150 words or less)*

My desire to serve my community, my belief that I would do a good job, the encouragement of many fellow attorneys and local judges to seek this seat, my goal to have the appellate courts forget my name because they so infrequently need to correct my mistakes, and my respect and admiration of Judge Loser. Judge Loser was the Judge of the Third Circuit when I was young, and he lived across the street from my family. He was also the Dean of the Nashville School of Law when I attended. I have respected and admired Judge Loser since I was a kid. Of all the judicial positions, this one is special to me because of Judge Joe C. Loser, Jr.

36. State any achievements or activities in which you have been involved which demonstrate your commitment to equal justice under the law; include here a discussion of your pro bono service throughout your time as a licensed attorney. *(150 words or less)*

I generally do not discuss which clients have employed me, and which clients I am representing without charge. There has been more than one case in which the Probate Court appointed me to serve as Guardian Ad Litem, the Ward had limited assets, and I requested no fee and no CLE credit. There has also been at least one case in which the defendant could not afford an attorney, a Judge has asked me to help the person, and I have attempted to assist the person without seeking any fee or CLE credit. Additionally, I have accepted court appointments for indigent persons since 2002, and in many cases, the amount of time I expended in representing the client exceeded the maximum compensable amount. Most of my pro bono work is a private agreement, with persons sent directly to me by friends and acquaintances, and not through the Pro Bono Program.

37. Describe the judgeship you seek (i.e. geographic area, types of cases, number of judges, etc. and explain how your selection would impact the court. *(150 words or less)*

The Third Circuit Court for Davidson County is one of eight civil circuit courts in the Twentieth Judicial District of Tennessee. It is a court of general jurisdiction, and can be assigned any case filed in the Circuit Court Clerk's office for Davidson County. The Circuit and Chancery Courts of Davidson County have concurrent jurisdiction, which means that the Third Circuit can be assigned cases sounding in both law and equity. Currently the area of law with the largest volume of filings in the Circuit Court for Davidson County is Domestic Relations. I will hear

any case assigned to the Third Circuit if appointed, including domestic relations. I will read and listen to the facts and evidence presented, weigh the evidence, and apply the law to the facts in rendering decisions. I believe that my broad and varied practice, representations of both plaintiffs and defendants, my patience with difficult people and my even temperament, has served my clients well in preparing and presenting their cases, and will aid my hearing and deciding difficult and emotionally charged cases.

38. Describe your participation in community services or organizations, and what community involvement you intend to have if you are appointed judge? **(250 words or less)**

While in elementary school, there was concern that the area around Radnor Lake would be developed with housing. I went door to door in our neighborhood, near Radnor Lake, raising money to help save Radnor Lake. More recently, my involvement has included participating in three of the five Dragon Boat Races and encouraging others to participate and contribute to the efforts of the Cumberland River Compact (the Dragon Boat Race is an annual fundraiser for the Cumberland River Compact), participating in two tree plantings with Seedlings in the City (sponsored by Stites & Harbison), participating in three Komen Breast Cancer Walks, participating in Habitat for Humanity building projects, participating in Harpeth River trash cleanup projects, participating in Room in the Inn with local churches, and participating in programs and activities with a few local churches. Last year a few friends and I were invited to help with a Christmas party for the Tennessee School for the Blind, and we are hoping that we will be allowed to participate in a Christmas party for the children at the Tennessee School for the Blind this year. If appointed, I desire to be involved in a wide variety of activities to help make our area better than it already is, and to support my fellow members of the bar in their community projects.

39. Describe life experiences, personal involvements, or talents that you have that you feel will be of assistance to the Commission in evaluating and understanding your candidacy for this judicial position. **(250 words or less)**

Sometimes, letting a person say what is on their mind, listening to what they want to say, releases their tension and frustration. It does not always work, and, on occasion what a person wanted to say was very offensive or abusive. Also, on occasion, it seemed that what a person wanted to say was without end. Many times while practicing law, and prior to being admitted to the Bar and working in sales, including car sales, insurance sales, and real estate sales, persons have begun an encounter with expressions of displeasure, and very negative remarks. After a relatively brief conversation, the person released their frustration, and was able to participate in a productive conversation. Many times, when potential clients first call or come to my office, they are upset and their thoughts seem scattered. Most of the time, after listening to them, we have been able to clarify what the facts and issues they want to discuss with me are, and what resolution they desired. Once, while selling cars, a man drove to the dealership to show me his car and explain to me why he did not need a new car. After a conversation, he purchased a new car, additional to the car he owned. He did not trade the car he had driven to the dealership; he wanted both cars. Sometimes when business partners and former friends have a dispute, even if

they lose their trial, they tell me that they feel better. They may disagree with the court's decision, they may never want to be friends or business partners with the other person again, but because a judge had listened to both sides, before making the decision, they can accept that decision. Generally, people are stressed and upset when they arrive at an attorney's office or court. When an attorney listens to them, and when a judge listens to them, even if the attorney or judge does not agree with them, somehow they feel better just because someone listened to them. Generally, when people go to court to have their dispute resolved, it is because they are not able to resolve their dispute themselves. Also, generally, at least one party disagrees with the judge's decision. Deciding cases based upon applying the law to the facts and issues presented, hopefully, will reduce the litigants displeasure with their situation, even when they disagree with my decision.

Will you uphold the law even if you disagree with the substance of the law (e.g., statute 40. or rule) at issue? Give an example from your experience as a licensed attorney that supports your response to this question. *(250 words or less)*

I will uphold the law even if I disagree with the substance of the law, statute or rule. A few years ago, I represented a wonderful older lady who had purchased hearing aids that had not improved her hearing. She had attempted to resolve the issue with the seller beginning immediately after the delivery, and he had refused to adjust the hearing aids so that her hearing was improved, refused to provide her with hearing aids that improved her hearing, and refused to return the money she had paid him for the hearing aids. Tenn. Code Ann. § 63-17-217(a) states that “. . . return privileges apply only to a first time purchaser of a hearing instrument.” The court interpreted this statute to allow that only the first set of hearing aids a person purchases in their life could be returned if the hearing aids were unsatisfactory for any reason. Second purchases and replacement hearing aids could not be returned for any reason. The hearing aids in question were not used, or previously sold, hearing aids, rather they were new and advertised and promoted to be superior to other hearing aids.

REFERENCES

41. List five (5) persons, and their current positions and contact information, who would recommend you for the judicial position for which you are applying. Please list at least two persons who are not lawyers. Please note that the Commission or someone on its behalf may contact these persons regarding your application.

A. Joe C. Loser, Jr., Nashville School of Law, 4013 Armory Oaks Drive, Nashville, Tennessee 37204, Telephone: (615) 256-3684

B. Thomas H. Forrester, Gullett, Sanford, Robinson & Martin, PLLC, 315 Deaderick Street, Suite 1100, Nashville, Tennessee 37238, Telephone: (615) 244-4994

C. Paul R. White, 222 Second Avenue North, Suite 360-M, Nashville, Tennessee 37201, Telephone: (615) 255-6441

D. John J. Griswold, Nero's Grill, 2122 Hillsboro Drive, Nashville, Tennessee 37215, Telephone: (615) 297-7777

E. Joel Wingard, 1645 Boxwood Drive, Nashville, Tennessee 37211, Telephone: (615) 832-0698

AFFIRMATION CONCERNING APPLICATION

Read, and if you agree to the provisions, sign the following:

I have read the foregoing questions and have answered them in good faith and as completely as my records and recollections permit. I hereby agree to be considered for nomination to the Governor for the office of Judge of the Third Circuit Court of Davidson County, Twentieth Judicial District of Tennessee, and if appointed by the Governor, agree to serve that office. In the event any changes occur between the time this application is filed and the public hearing, I hereby agree to file an amended questionnaire with the Administrative Office of the Courts for distribution to the Commission members.

I understand that the information provided in this questionnaire shall be open to public inspection upon filing with the Administrative Office of the Courts and that the Commission may publicize the names of persons who apply for nomination and the names of those persons the Commission nominates to the Governor for the judicial vacancy in question.

Dated: October 28, 2011.

/s/ Keith Alan Turner

Keith Alan Turner

When completed, return this questionnaire to Debbie Hayes, Administrative Office of the Courts, 511 Union Street, Suite 600, Nashville, TN 37219.



**TENNESSEE JUDICIAL NOMINATING COMMISSION
511 UNION STREET, SUITE 600
NASHVILLE CITY CENTER
NASHVILLE, TN 37219**

TENNESSEE BOARD OF PROFESSIONAL RESPONSIBILITY

WAIVER OF CONFIDENTIALITY

I HEREBY WAIVE THE PRIVILEGE OF CONFIDENTIALITY WITH RESPECT TO ANY INFORMATION WHICH CONCERNS ME, INCLUDING ANY COMPLAINTS ERASED BY LAW, AND IS KNOWN TO, RECORDED WITH, ON FILE WITH THE BOARD OF PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF TENNESSEE, AND I HEREBY AUTHORIZE A REPRESENTATIVE OF THE TENNESSEE JUDICIAL NOMINATING COMMISSION TO REQUEST AND RECEIVE ANY SUCH INFORMATION.

/s/ KEITH ALAN TURNER_____

KEITH ALAN TURNER

/S/ KEITH ALAN TURNER_____

SIGNATURE

OCTOBER 28, 2011_____

DATE

020545_____

BPR #

**IN THE CHANCERY COURT FOR WHITE COUNTY, TENNESSEE
13TH JUDICIAL DISTRICT OF TENNESSEE, AT SPARTA**

CLYDE HOUSTON FISHER)

Plaintiff,)

vs.)

Case No. _____)

ONA MAI SIMMONS SAVAGE, and)

MILLIE SIMMONS PETTIT,)

Defendants.)

COMPLAINT FOR SALE FOR PARTITION

Comes now Clyde Houston Fisher, the “Plaintiff”, and respectfully shows to the Court:

1. That Elijah L. Simmons died intestate in White County, on November 10, 1964, the owner in fee of a certain tract of land (hereinafter the “Property”), in the 3rd Civil District of White County, on Simmons Cemetery Road, district/map/parcel number 03-109-020.00. A copy of the certificate of death of Eligah L. Simmons is attached hereto as Exhibit A. A copy of the State of Tennessee real estate appraisal card for the Property is attached hereto as Exhibit B. A copy of what is believed to be the deed to the Property is attached hereto as Exhibit C. A copy of the tax drawing of the Property is attached hereto as Exhibit D.

2. That Elijah L. Simmons was survived by Maggie Simmons, his wife; Ona Mai Savage, his daughter; Millie Pettit, his daughter; and, Hazel Fisher, his daughter.

3. That Maggie Simmons died intestate in White County, on March 14, 1966, and was survived by Ona Mai Simmons Savage, her daughter; Millie Simmons Pettit, her daughter; and, Hazel Jake Simmons Fisher, her daughter. A copy of the certificate of death for Maggie Simmons is attached hereto as Exhibit E.

4. That Hazel Jake Simmons Fisher died testate in Davidson County, on June 21, 1997. By her will duly probated in the Probate Court of Davidson County, Tennessee, case number 97P1126, Hazel Jake Simmons Fisher bequeathed all of her real property to Clyde Houston Fisher, her husband. A copy of the certificate of death for Hazel Jake Simmons Fisher is attached hereto as Exhibit F. A copy of the will of Hazel Jake Simmons Fisher is attached hereto as Exhibit G.

5. Based upon information and belief, Ona Mai Simmons Savage and Millie Simmons Pettit are individuals presently residing and domiciled in White County, Tennessee.

6. That the plaintiff is an individual presently residing in Davidson County, Tennessee.

7. That the plaintiff and the defendants are owners of the Property by tenancy in common, each having an undivided one-third (1/3) interest in the Property.

8. That Clyde Houston Fisher, the plaintiff, and Ona Mai Savage, a defendant, have agreed to and executed a listing contract with the Auction Division of Beck & Beck, Inc. for the sale of the Property. A copy of the above mentioned listing contract is attached hereto as Exhibit H.

9. That the plaintiff, pursuant to TENN. CODE ANN. § 29-27-101 *et seq.*, is entitled, as a tenant in common, to either a partition in kind or for a sale for partition of the Property.

10. That said Property is undeveloped, rural property with limited road access, timber suitable for harvesting, access to the Caney Fork River, scenic views, steep hillsides, and no structures suitable for use as a residence.

11. That, based upon the characteristics of the Property, it would be manifestly to the advantage of the parties that it be sold for partition, instead of partitioned in kind.

12. That the plaintiff, pursuant to TENN. CODE ANN. § 29-27-201, is entitled to have the Property sold for partition.

WHEREFORE, THE PREMISES CONSIDERED, the plaintiff prays:

1. That those named as defendants in the caption be made such by service of process, and that they each be required to answer the complaint.
2. That the Court enter an order appointing David H. Bradley of White County, Tennessee, surveyor to survey the Property and prepare a drawing of the Property.
3. That the Court enter an order appointing the Auction Division of Beck & Beck, Inc. of Davidson County, Tennessee, the broker to sell the Property at auction.
4. That the proceeds, after satisfying the fees and expenses of the surveyor, the broker, the Court, and liens if any, be divided between the parties in accordance with their respective rights, and to this end that all necessary references to the Master be made.
5. And for such other, further, general and special relief as the Court deems equitable.

Respectfully submitted,

BECK & BECK ATTORNEYS AT LAW, PLLC

By: _____

Keith A. Turner (BPR # 20545)
Attorney for Plaintiff
4205 Gallatin Road
Nashville, TN 37216-2111
(615) 226-9000
(615) 226-2211 Facsimile

CERTIFICATE OF SERVICE

The undersigned, Keith A. Turner, hereby certifies that this ___ day of _____, 2000, he caused a true and correct copy of the foregoing document to be served upon _____, the counsel of record for the _____, by United States Mail, first class postage prepaid.

Keith A. Turner

**IN THE SEVENTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE (PROBATE DIVISION)**

IN RE:)
)
THE ESTATE OF MARY A. DUNN,)
Deceased.) **No. 08P-49**
)
KEITH A. TURNER,)
Attorney Ad Litem for Unknown Heirs.)

**FIRST REVISED MOTION OF ATTORNEY AD LITEM TO DECLARE CERTAIN
PERSONS TO BE HEIRS OF MARY ALICE DUNN**

Comes now Keith A. Turner, the Attorney Ad Litem for Unknown Heirs of Mary Alice Dunn, and, for and on behalf of the Unknown Heirs of Mary Alice Dunn, respectfully moves this Honorable Court to enter an Order Declaring Certain Persons to be Heirs at Law of Mary Alice Dunn, and in support of his motion said Attorney Ad Litem for the Unknown Heirs of Mary Alice Dunn would show unto the Court as follows:

1. On January 16, 2008, the Court entered an Order Granting Letters of Administration Mr. Christopher Utley and Appointing Mr. Christopher Utley as Administrator for the Estate of Mary Alice Dunn.
2. On January 16, 2008, the Court entered an Order Appointing Keith A. Turner, Attorney Ad Litem to Represent the Interests of the Unknown Heirs of Mary Alice Dunn.
3. That since being appointed by the Court, your Attorney Ad Litem has endeavored to locate heirs of the decedent, including, but not limited to, attempts to locate and speak with persons listed in the decedent's mother's obituary as relatives of said deceased mother of Mary Alice Dunn, has endeavored to speak with members of the Jefferson Street Missionary Baptist Church which is the church that Mary Alice Dunn's mother attended for many years, endeavored to locate and obtain a copy of Mary Alice Dunn's Birth Certificate, endeavored to locate and obtain a copy of Mary Alice

Dunn's mother's Birth Certificate, searched the records of the Tennessee State Archives, searched records maintained by Ancestry.com, searched Federal Census Records, and searched Giles County, Tennessee records including birth records, death records, property records, school records and marriage records, placed a notice in The Giles County Historical Society Quarterly Bulletin, responded to inquiries from persons alleged to be relatives of Mary Alice Dunn and requested those persons assistance in locating documents and records, searched the Social Security Death Index, sent request for information to the United State Postal Service and followed up with telephone calls, contacted persons active in historic preservation in Giles County, Tennessee, requested records from the State of Ohio, and requested records from the State of Illinois. Your Attorney Ad Litem has also maintained communications with Mr. Christopher Utley, the Personal Representative of the Estate, and Thomas H. Ware, counsel for the personal Representative.

4. On May 5, 2008, Terry T. Wiens, Esq. (Oklahoma Bar # 9591), filed with the Clerk of this Court a Notice of Heirship wherein he stated that twenty-three (23) certain listed persons were each first cousins of the decedent, Mary Alice Dunn.

5. Since receipt of said Notice of Heirship, your Attorney Ad Litem has corresponded with attorney Terry T. Wiens via telephone, United States Mail, and email regarding documentation and proof of the kinship of the twenty-three (23) certain persons declared, in the Notice of Heirship filed by attorney Terry T. Wiens, to each be first cousins of the decedent, Mary Alice Dunn.

6. August 8, 2008, attorney Terry T. Wiens filed with the Clerk of this Court a document titled Proof of Heirship with Exhibits. This filing was raw data, no distillation, no compilation, no explanation, and is unhelpful to the Court because it is just raw data. By email of September 22, 2010, Mr. Wiens provided your Attorney Ad Litem for the first time with the current address of the

persons he has alleged to be related to the decedent, Mary Alice Dunn. Mr. Wiens has alleged that he sent that list to your Attorney Ad Litem by mail on March 29, 2010, but no such letter was received by your Attorney Ad Litem nor mentioned by Mr. Wiens in any of his communications since March 29, 2010 prior to his email of September 22, 2010.

7. Since receipt of said Proof of Heirship and Exhibits, your Attorney Ad Litem has corresponded with attorney Terry T. Wiens via telephone, United States Mail, and email regarding the Proof of Heirship and the Exhibits he has filed in this matter with the Clerk of this Court.

8. Upon information and belief, your Attorney Ad Litem states that a certain person listed on the Notice of Heirship as Scott Hershall is the same certain person as the Hershall Eugene Scott whose Birth Certificate is included as Exhibit 18 to the Proof of Heirship filed with the Clerk of this Court by attorney Terry T. Wiens, and that said certain person was incorrectly listed on the Notice of Heirship filed by attorney Terry T. Wiens as Scott Hershall.

9. Upon information and belief, your Attorney Ad Litem states that a certain Stephan Dewayne Belser included on the Paternal Moiety filed with the Proof of Heirship with the Clerk of this Court in this matter by attorney Terry T. Wiens, and whose Birth Certificate is included as Exhibit 52 to the Proof of Heirship filed with the Clerk of this Court by attorney Terry T. Wiens, was not listed on the Notice of Heirship filed by attorney Terry T. Wiens, and said certain Stephan Dewayne Belser should have been listed on said Notice of Heirship.

10. Your Attorney Ad Litem is not aware of any Motion, other than your Attorney Ad Litem's Motion filed February 25, 2010, pending before this Court related the relief requested herein. Neither the Proof of Heirship filed by attorney Terry T. Wiens nor the Notice of Heirship filed by attorney Terry T. Wiens is styled as a Motion, nor do either the said Proof of Heirship or said Notice

of Heirship give notice, as required by Rule 26 of the Local Rules of Practice, of the date, time and place of hearing on Motion.

11. Since the filing of your Attorney Ad Litem's Motion to Declare Certain Persons to be Heirs of Mary Alice Dunn, your Attorney Ad Litem has been contacted by certain persons who are alleged to be heirs of Mary Alice Dunn, including Janice Gill, Clarence Edmondson, Andrea Johnson, Keith Edmondson, Nola Dewan, and Devra Harney. Since receiving the list of addresses and telephone numbers from Mr. Wiens on September 22, 2010, your Attorney Ad Litem has begun the process of attempting to contact those persons by telephone.

12. One of the records sent to your Attorney Ad Litem by both Keith Edmondson and Devra Harney was a document titled "Revised Listing of Names and Addresses, Edmondson Family 1982", *attached hereto as Exhibit "G"*. Both Keith Edmondson and Devra Harney stated to your Attorney Ad Litem that this document was created related to a family gathering or reunion in or about 1982. This document states that it is a list of the descendants of Sarah's children: Benjamin, John, Bruel, Guy, Eslick, Edgar, William, Murdel, Mabel, Anna, Selina. Under the title "Guy Edmondson's Children" are listed "Mary Alyce Edmondson Dunn, 12820 Brookfield Ave., Cleveland, Ohio 44135, Tel. No.: , and Obie Reynolds, 8016 South St. Lawrence Ave, Chicago, Illinois 60619, Tel. No. (312) 874-8933."

13. Your Attorney Ad Litem has endeavored to locate the listed Obie Reynolds, including asking Keith Edmondson and Devra Harney if they knew how to contact Obie Reynolds, asking other persons who are alleged to be heirs of Mary Alice Dunn if they knew how to contact Obie Reynolds, writing a letter to the Postmaster requesting all mail forwarding instructions for Ms. Obie Reynolds whose last known address is 8016 South Saint Lawrence Avenue, Chicago, Illinois 60619,

telephoning the Chicago, Illinois Post Office for zip code 60619 and speaking to the Post Office manager and other employees of that Post Office, telephoning 1-800-ASK-USPS and inquiring where the Post Office maintains old mail forwarding instructions, search internet for Ms. Obie Reynolds, attempt telephone call to telephone number (312) 874-8933, searching the Social Security Death Index, sending a request for death records search and for a certified copy of the Death Certificate of Obie Reynolds to the Ohio Department of Health, Office of Vital Statistics, and sending a request for death records search and for a certified copy of the Death Certificate of Obie Reynolds to the Illinois Department of Public Health, Division of Vital Records. As of the writing of this Revised Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn, your Attorney Ad Litem has not been successful in his attempts to locate records related to the Obie Reynolds listed in the Revised Listing of Names and Addresses, Edmondson Family 1982 received from Keith Edmondson and Devra Harney. Your Attorney Ad Litem is still awaiting response from the Illinois Department of Public Health.

14. During your Attorney Ad Litem's discussions with Devra Harney, she stated that her father, James Clifton Harney, died on September 22, 2008, in Crestline, Crawford County, Ohio, at the age of 76. Devra Harney has provided your Attorney Ad Litem with a certified copy of James Clifton Harney's Certificate of Death, and said Certificate of Death is *attached hereto as Exhibit "H"*. James Clifton Harney was listed in Number 9 of THE PERSONS AND THEIR KINSHIPS TO THE DECEDENT in the Motion of Attorney Ad Litem to Declare Certain Person to Be Heirs of Mary Alice Dunn.

15. The persons sought to be declared heirs-at-law by this Motion are within the class of persons your Attorney Ad Litem has been appointed to represent.

16. Your Attorney Ad Litem will refer to exhibits previously filed with the Clerk of the Court by attorney Terry T. Wiens by the same designation (i.e. Exhibit 1 to Proof of Heirship) in an effort to minimize confusion. Exhibits included with this motion that are not previously filed with the Clerk of this Court will be given alphabetic designations as were the exhibits included with the Motion of Attorney Ad Litem to Declare Certain Persons to Be Heirs of Mary Alice Dunn .

17. Each of the certain persons in this Motion attempting to establish their kinship to the decedent, Mary Alice Dunn, are attempting to establish their kinship through their kinship to her father, Mr. Guy Edmondson, and his parents and his siblings.

18. Upon information and belief, the decedent, Mary Alice Dunn, at the time of her death, was a widow, she did not have any children or issue, and she was predeceased by her parents.

19. The Certificate of Birth of the decedent, Mary Alice Dunn, states that the decedent was born May 27, 1920, in Giles County, Tennessee, that her father was Guy Edmondson and her mother's maiden name was Mary Colverson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit "A"*.

20. The Federal Census Record of 1920 lists in the 6th Civil District of Giles County, Tennessee, a household consisting of Guy Edmondson - age 26, and Mary Edmondson - age 23, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit "B"*.

21. The Certificate of Death of Mary Elizabeth Edmondson, mother of the decedent, states that she died September 10, 1988, in Nashville, Tennessee, that her father's name was Quincy Culberson, that her mother's name was Mary, and that she was born in Texas, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit "E"*.

22. The newspaper Death Notice for Mary Elizabeth Edmondson is *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit "F"*. Also incorporated by reference herein is Exhibit 7 to the Proof of Heirship filed by attorney Terry T. Wiens, Certificate of Death of Mary Elizabeth Edmondson, and Exhibit 8 to the Proof of Heirship filed by attorney Terry T. Wiens, Death Notice for Mary Elizabeth Edmondson.

23. The Certificate of Death of Guy Edmondson states that he died March 23, 1974, in Akron, Ohio, that his father's name was John Henry Edmondson, and that he was born in Tennessee, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit "C"*.

24. The newspaper Death Notice for Guy Edmondson states that Guy Edmondson was born in Pulaski, Tennessee, which is in Giles County, that Guy Edmondson moved to Akron, Ohio in 1926, and that he was survived by a brother, Rev. B. B. Edmondson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit "D"*.

25. The World War I Draft Registration Card for Guy Edmondson states that his home address is RFD #6, Pulaski, Giles County, Tennessee, that he was born July 5, 1892, in Pulaski, Tennessee, that he is employed by Sarah Edmondson at the Sarah Edmondson Farm, and that he has a wife dependent upon him for support, *attached hereto as Exhibit "P"*.

26. The World War II Draft Registration Card for Guy Edmondson states that his place of residence is 305 N. Howard Street, Akron, Summit County, Ohio, that he was born July 5, 1893 in Paulasti, Tennessee, that Gladys Oden at 305 N. Howard Street, Akron, Ohio, will always know his address, *attached hereto as Exhibit "Q"*.

27. Guy Edmondson was the son of John Henry Edmondson and Sarah Edmondson, and was the

brother of Selina, John T., Edgar, Benjamin, May B., Bruel, and Eslick.

28. The Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee, a household consisting of John H Edmondson - age 49, wife Sarah - age 47, daughter Salena - age 19, son John T Edmondson - age 16, son Edgar Edmondson - age 13, son Benjamin Edmondson - age 12, daughter May B Edmondson - age 10, son Guy Edmondson - age 7, son Burel Edmondson - age 4, and son Elick Edmondson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.*

29. On October 7, 2010, your Attorney Ad Litem received a telephone call from Mr. Wiens, and during this telephone conversation, Mr. Wiens stated that he had met the previous evening with some of the family members, that this was his first face to face meeting with these family members, and that these family members had provided him with photographs and an envelope addressed to Bessie Gaskins from Mary Alice Edmondson that was sent in 1982. Mr. Wiens faxed these photographs and envelope to your Attorney Ad Litem, *attached hereto as Exhibit "T"*. The fax transmittal cover sheet indicates that this fax was also sent to Mr. Tom Ware, attorney for the Administrator.

THE PERSONS AND THEIR KINSHIPS TO THE DECEDENT

1. Your Attorney Ad Litem submits to the Court that Byron K. Belser, born February 19, 1967, Los Angeles County, California, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that he is of the Sixth Degree of Kinship to the decedent. Mr. Byron K. Belser is the son of James Belser and Virginia Edmondson-Belser, and Virginia Edmondson-Belser was the daughter of Benny Eslick Edmondson and Ida J. Covington-Edmondson, and Benny Eslick Edmondson was the son of Benjamin Edmondson and Marie "Mamie" Edmondson, and Benjamin Edmondson was

the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

Your Attorney Ad Litem states that the Birth Certificate of the decedent, Mary Alice Edmondson-Dunn, states that the decedent was born on May 27, 1920 in the 6th Civil District of Giles County, Tennessee, the decedent's father was twenty six (26) at the time of decedent's birth and his name was Guy Edmondson, and that decedent's mother was twenty three (23) at the time of decedent's birth and her maiden name was Mary Colverson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit A*. Your Attorney Ad Litem further states that the Certificate of Death of Guy Edmondson states that Guy Edmondson died March 23, 1974 in Akron, Ohio, and that his father's name was John Henry Edmondson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit C*. Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmondson - age 49, married to wife Sarah - age 47, and children Salena Edmondson - age 19, John T. Edmondson - age 16, Edgar Edmondson - age 13, Benjamin Edmondson - age 12, May B. Edmondson - age 10, Guy Edmondson - age 7, Burel Edmondson - age 4, and Elick Edmondson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the newspaper Death Notice for Guy Edmondson states that Guy Edmondson was born in Pulaski, Tennessee, which is in Giles County, that Guy Edmondson moved to Akron, Ohio in 1926, and that he was survived by a brother, Rev. B. B. Edmondson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit D*. Your Attorney Ad Litem also states that the Certificate of Death of Bruel Edward Edmondson states that he died October 19, 1980 in Cincinnati, Ohio, that he was a retired minister,

that his father's name was John Henry Edmondson, and that his mother's maiden name was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein*. Your Attorney Ad Litem further states that the death notice of Benny Eslick Edmondson states that said Benny Eslick Edmondson was preceded in death by brothers Solon Edmondson and Boston Edmondson, and by sister Jean, *Exhibit 50 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein*. Your Attorney Ad Litem also states that the Federal Census Record of 1930 lists in Fairfield, Jefferson County, Alabama, a household containing Ben Edmondson - age 42, married to wife Mamie Edmondson - age 29, and children Boston Edmondson - age 16, Solon Edmondson - age 8, Marjorie Edmondson - age 4 and 9/12, and Delores Edmondson - age 1 and 8/12, *Exhibit 37 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein*. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Byron Belser resides at 354 ½ Fourth Street, Jersey City, NJ 07302.

2. Your Attorney Ad Litem submits to the Court that Nola Louise Scott-Dawan, July 11, 1945, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that she is of the Sixth Degree of Kinship to the decedent. Nola Louise Scott-Dawan is the daughter of Richard Cecil Scott and Helen Frances Carson-Scott, and Richard Cecil Scott was the son of Lloyd W. Scott, Sr., and Nola Dean-Scott, and Nola Dean Scott was the daughter of James Dean and Selina Edmondson-Dean, and Selina Edmondson-Dean was the sister of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Nola

Louise Scott-Dawan states that the father of Nola Louise Scott was Richard Cecil Scott and the maiden name of the mother was Helen Frances Scott, *Exhibit 24 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Record of Death of Richard Scott states that he is survived by his wife Helen Carson Scott, that his father was Lloyd Scott and his mother's maiden name was Nola Dean, *Exhibit 21 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the obituary for Richard Scott states that he was the son of Lloyd and Nola (Dean) Scott, that his grandparents were Selena and James Dean, that he is survived by his wife Helen (Carson) Scott, and that he is also survived by four daughters and three sons-in-law, Nola and Omar Dawan, Deborah McIntyre, Karen and Lance Kelley, and, Andrea and Charles Johnson, *Exhibit 23 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the 1930 Federal census records for Springfield, Ohio, show a household which included the father James Dean, Mother Selinda Dean, daughter Bessie Dean, daughter Nola Scott, grandson Loyd Scott, and grandson Richard Scott, *Exhibit 15 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Nola Louise Scott-Dawan resides at 1238 Cobb Avenue, Springfield OH 45506. Your Attorney Ad Litem has spoken by telephone with Nola Dawan, and she recalls meeting the decedent at her Aunt Bessie Dean-Gaskins's home when the decedent would come from Cleveland, Ohio to visit Bessie Gaskins in Springfield, Ohio.

3. Your Attorney Ad Litem submits to the Court that Melvin Wayne Edmondson, born May 6,

1948, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Melvin Wayne Edmondson is the son of Bruel Edward Edmondson, Jr., and Christine Melrose Glenn-Edmondson, and Bruel Edward Edmondson, Jr., was the son of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Melvin Wayne Edmondson states that the father of Melvin Wayne Edmondson was Bruel E. Edmondson and the name of the mother of Melvin Wayne Edmondson was Christina M. Edmondson and that her maiden name was Glenn, *Exhibit 75 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Last Will and Testament of Bruel E. Edmondson, Jr., states that the three children of Bruel E. Edmondson, Jr., are Keith Edward Edmondson, Donna Faye Henderson, and Melvin Wayne Edmondson, *Exhibit 71 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* The Marriage License of Bruel Edmondson and Favola Mitchell states that they were married on October 9, 1922, in Clark County, Ohio, *attached hereto as Exhibit*

“N”. The World War I Draft Card for Bruel Edmondson states that his permanent home address is #6, Pulaski, Giles County, Tennessee, and that his nearest relative is his mother, Sarah Edmondson, of #6, Pulaski, Giles County, Tennessee, and that Bruel Edmondson was born December 6, 1897, *attached hereto as Exhibit “O”*. Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference*. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Melvin Edmondson resides at 1055 E. Home Road, Apartment C, Springfield, OH 45503-2778. Donna Henderson has told your Attorney Ad Litem that Melvin Edmondson is currently working in Germany.

4. Your Attorney Ad Litem submits to the Court that Clarence Edmondson, born March 19, 1935, in Birmingham, Jefferson County, Alabama, is a first cousin of the decedent, Mary Alice Edmondson, and that he is of the Fourth Degree of Kinship to the decedent. Clarence Edmondson is the son of Benjamin Edmondson and Marie “Mamie” Edmondson, and Benjamin Edmondson was the brother of Guy Edmondson, and Guy Edmondson was the decedent’s father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Clarence Edmondson states that the father of Clarence Edmondson was Ben Edmondson and the maiden name of the mother of Clarence Edmondson was Mamie James, *Exhibit 54 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmondson - age 49 married to wife Sarah - age 47 and children Salena Edmondson - age 19, John T. Edmondson - age 16, Edgar Edmondson - age 13, Benjamin Edmondson - age 12, May B. Edmondson - age 10, Guy Edmondson - age 7, Burel Edmondson - age 4, and Elick Edmondson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the death notice of Benny Eslick Edmondson states that said Benny Eslick Edmondson was preceded in death by brothers Solon Edmondson and Boston Edmondson, and by sister Jean, *Exhibit 50 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein*. Your Attorney Ad Litem states that the above referenced death notice of Benny Eslick Edmondson also states that Benny Eslick Edmondson was survived by brother Dr. Clarence Edmondson, sister Marjorie Norflis, niece Donna (Benny) Tucker, nephew Benjamin Paul (Roslyn) Edmondson, grandsons Steven Belser and Bryon Belser, step-daughter Valerie Covington, and brother-in-law Alzalkia (Pearl) Jones. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Clarence Edmondson resides at 30 Sedgewick Avenue, Bluffton, SC 29910. Your Attorney Ad Litem has spoken to Dr. Clarence Edmondson by telephone and corresponded by email with Dr. Clarence Edmondson. Dr. Clarence Edmondson has emailed to your Attorney Ad Litem two pictures of his father, Ben Edmondson, with the decedent's

father, Guy Edmondson, taken at a picnic in 1946, *attached hereto as Exhibits "I" and "J"*. Dr. Clarence Edmondson has also emailed to your Attorney Ad Litem a picture of the decedent's and his grandmother, Sarah Edmondson, *attached hereto as Exhibit "K"*.

5. Your Attorney Ad Litem submits to the Court that Keith Edward Edmondson, born April 4, 1945, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Keith Edward Edmondson is the son of Bruel Edward Edmondson, Jr., and Christine Melrose Glenn-Edmondson, and Bruel Edward Edmondson, Jr., was the son of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Keith Edward Edmondson states that the father of Keith Edward Edmondson was Bruel E. Edmondson and the maiden name of the mother of Keith Edward Edmondson was Christina Glenn, *Exhibit 72 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Last Will and Testament of Bruel E. Edmondson, Jr., states that the three children of Bruel E. Edmondson, Jr., are Keith Edward Edmondson, Donna Faye Henderson, and Melvin Wayne Edmondson, *Exhibit 71 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*.

Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Keith Edmondson resides at 10148 Timberview Ct., Cincinnati, OH 45215. As is stated above, your Attorney Ad Litem has spoken to Keith Edmondson by telephone and corresponded with him by email. Both he and Devra Harney have provided your Attorney Ad Litem with copies of the document titled “Revised Listing of Names and Addresses, Edmondson Family 1982”, *attached hereto as Exhibit “G”.*

6. Your Attorney Ad Litem submits to the Court that Boston Joseph Edmondson, Jr., born December 15, 1937, in Bay St. Louis, Hancock County, Mississippi, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent.

Boston Joseph Edmondson, Jr., is the son of Boston Joseph Edmondson, Sr., and Geraldine Alice Raboteau-Edmondson, and Boston Joseph Edmondson, Sr., was the son of Benjamin Edmondson and Marie “Mamie” Edmondson, and Benjamin Edmondson was the brother of Guy Edmondson, and Guy Edmondson was the decedent’s father.

In support of this assertion, your Attorney Ad Litem states that the birth certificate of Boston Joseph Edmondson, Jr., states that the father of Boston Joseph Edmondson, Jr., was Boston Edmondson and the maiden name of the mother of Boston Joseph Edmondson, Jr., was Geraldine Alice Raboteau, *Exhibit 40 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49, married to wife Sarah - age 47, and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the death notice of Benny Eslick Edmundson states that said Benny Eslick Edmundson was preceded in death by brothers Solon Edmundson and Boston Edmondson, and by sister Jean, *Exhibit 50 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein.* Your Attorney Ad Litem also states that the Federal Census Record of 1930 lists in Fairfield, Jefferson County, Alabama, a household containing Ben Edmondson - age 42, married to wife Mamie Edmondson - age 29, and children Boston Edmondson - age 16, Solon Edmondson - age 8, Marjorie Edmondson - age 4 and 9/12, and Delores Edmondson - age 1 and 8/12, *Exhibit 37 to the Proof of Heirship filed by attorney Terry T.*

Wiens, and incorporated by reference herein. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Boston Edmondson, Jr., resides at 508 Main Street, Bay St. Louis, MS 39520-2730. Your Attorney Ad Litem has spoken with Boston Edmondson, Jr., by telephone. He stated that all his records, including family records, were destroyed by Hurricane Katrina. He also stated that Marjorie Edmondson married Alvin Norfliss, that they have both died, and that they did not have any children. He also stated that Delores Edmondson has died, that she never married, and that she did not have any children.

7. Your Attorney Ad Litem submits to the Court that Mrs. Janice Cornelia Edmondson-Gill, born September 16, 1939, in Bay St. Louis, Hancock County, Mississippi, is a first cousin once removed of the decedent, Mary Alice Dunn, and that she is of the Fifth Degree of Kinship to the decedent. Mrs. Janice Cornelia Edmondson-Gill is the daughter of Boston Joseph Edmondson, Sr., and Geraldine Alice Raboteau-Edmondson, and Boston Joseph Edmondson, Sr., was the son of Benjamin Edmondson and Marie "Mamie" Edmondson, and Benjamin Edmondson was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the birth certificate of Janice Cornelia Edmondson-Gill states that the father of Janice Cornelia Edmondson was Boston Edmondson and the maiden name of the mother of Boston Joseph Edmondson, Jr., was Geraldine Alice Raboteau, *Exhibit 41 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49, married to wife Sarah - age 47, and children Salena Edmundson - age

19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the death notice of Benny Eslick Edmondson states that said Benny Eslick Edmondson was preceded in death by brothers Solon Edmondson and Boston Edmondson, and by sister Jean, *Exhibit 50 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein.* Your Attorney Ad Litem also states that the Federal Census Record of 1930 lists in Fairfield, Jefferson County, Alabama, a household containing Ben Edmondson - age 42, married to wife Mamie Edmondson - age 29, and children Boston Edmondson - age 16, Solon Edmondson - age 8, Marjorie Edmondson - age 4 and 9/12, and Delores Edmondson - age 1 and 8/12, *Exhibit 37 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Janice Gill resides at 1668 Fort Davis St. SE, Washington, DC 20020-1043. Your Attorney Ad Litem has spoken to Janice Gill by telephone. She stated that she has looked, and she has not located any family records in her possession.

8. Your Attorney Ad Litem submits to the Court that Gwendolyn Sue Scott-Gore born October 2, 1946, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that she is of the Sixth Degree of Kinship to the decedent. Gwendolyn Sue Scott-Gore is the daughter of Lloyd W. Scott, Jr., and Bertha M. Long-Scott, and Lloyd W. Scott, Jr., was the son of Lloyd W. Scott, Sr., and Nola Dean-Scott, and Nola Dean Scott was the daughter of James

Dean and Selina Edmondson-Dean, and Selina Edmondson-Dean was the sister of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Gwendolyn Sue Scott-Gore states that the father of Gwendolyn Sue Scott was Lloyd William Scott, Jr., and the maiden name of the mother was Bertha M. Long, *Exhibit 19 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the 1930 Federal census records for Springfield, Ohio, show a household which included the father James Dean, Mother Selinda Dean, daughter Bessie Dean, daughter Nola Scott, grandson Loyd Scott, and grandson Richard Scott, *Exhibit 15 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Gwendolyn Gore resides at 4114 Walkabout Circle, Missouri City, TX 77459.

9. Mr. James Clifton Harney has died and the Certificate of his Death is *attached hereto as Exhibit "H"*. Your Attorney Ad Litem submits to the Court that the children of James Clifton Harney are first cousins twice removed of the decedent. James Clifton Harney was born May 30, 1932 in Giles County, Tennessee, was a first cousin once removed of the decedent, Mary Alice Dunn, and that he was of the Fifth Degree of Kinship to the decedent. James Clifton Harney was the son of James William Harney and Anna Pearl Edmondson-Harney-Mitchell, and Anna Pearl Edmondson was the daughter of Elsick Edmondson and Roberta McNairy-Edmondson, and Elsick Edmondson was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of James

Clifton Harney states that the father of James Clifton Harney was James W. Harney and the maiden name of the mother was Anna Pearl Edmondson, *Exhibit 79 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad litem further states that the Certificate of Death of James Clifton Harney states that the father of James Clifton Harney was James William Harney and his mother's name was Anna Pearl Mitchell, *attached hereto as Exhibit "H".* Your Attorney Ad Litem also states that the Certificate of Death of Anna Pearl Mitchell states that her father was Eslick Edmondson and that her mother's maiden name was Roberta McNairy, *Exhibit 77 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the World War 1 Draft Registration Card for Eslick Edmondson states that his date of birth was October 6, 1899, and that his nearest relative was Roberta Edmondson, *Exhibit 76 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* The Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee, a household consisting of John H Edmondson - age 49, wife Sarah - age 47, daughter Salena - age 19, son John T Edmondson - age 16, son Edgar Edmondson - age 13, son Benjamin Edmondson - age 12, daughter May B Edmondson - age 10, son Guy Edmondson - age 7, son Burel Edmondson - age 4, and son Elick Edmondson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.*

Your Attorney Ad Litem, as part of his efforts to locate relatives of Mary Alice Dunn, placed a Notice in the quarterly newsletter of the Giles County Historical Society, and Ms. Devra A. Harney contacted your Attorney Ad Litem in response to that Notice. Your Attorney Ad Litem has communicated with Devra Harney by telephone, mail and email. Devra Harney has provided your Attorney Ad Litem with several documents and records including, the Revised Listing of Names and

Addresses, Edmondson Family 1982, *attached hereto as Exhibit "G"*, the Certificate of Death of James Clifton Harney, *attached hereto as exhibit "H"*, the Marriage License of James C. Harney and Betty Jean Mangrum, *attached hereto as Exhibit "L"*, the Birth Certificate of Devra Ann Harney, *attached hereto as Exhibit "M"*, the Marriage License of Bruel Edmondson and Favola Mitchell, *attached hereto as Exhibit "N"*, the World War I Draft Registration Card of Bruel Edmondson, *attached hereto as Exhibit "O"*, the World War I Draft Registration Card of Guy Edmondson, *attached hereto as Exhibit "P"*, the World War II Draft Registration Card of Guy Edmondson, *attached hereto as Exhibit "Q"*, the World War I Draft Registration Card of Eslick Edmondson, *attached hereto as Exhibit "R"*, and, the World War I Draft Registration Card of Ben Edmondson, *attached hereto as Exhibit "S"*.

Your Attorney Ad Litem submits to the Court that, since her father has died, that Devra Harney and her siblings are heirs of the decedent, Mary Alice Dunn. The Birth Certificate of Devra Harney states that her parents are Mr. and Mrs. James C. Harney, *attached hereto as Exhibit "M"*. Devra Harney has stated to your Attorney Ad Litem that her father, James Clifton Harney, had 6 children: Devra Harney, born February 24, 1955; Dr. Jocelyn Y. Harney, born August 31, 1956; Mark Anthony Harney, born June 4, 1958; Regina Ann Harney-Birmingham, born March 6, 1960; Martin Victor Harney, born August 1, 1961; and, Adam Lee Harney, born June 7, 1963. Ms. Devra Harney's current address is 1803 Francon Court, SW, Conyers, GA 30094. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Mark A. Harney resides at 422 South Wiley Street, Crestline, OH 44827. Your Attorney Ad Litem has attempted to call Mark Harney at the telephone number provided by Mr. Wiens on September 22, 2010, but has gotten a busy signal each attempt.

10. Your Attorney Ad Litem submits to the Court that Donna Faye Edmondson-Henderson, born September 17, 1946, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that she is of the Fifth Degree of Kinship to the decedent. Donna Faye Edmondson is the daughter of Bruel Edward Edmondson, Jr., and Christine Melrose Glenn-Edmondson, and Bruel Edward Edmondson, Jr., was the son of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Donna Faye Edmondson states that the father of Donna Faye Edmondson was Bruel E. Edmondson, Jr., and the name of the mother of Donna Faye Edmondson was Christina and that her maiden name was Glenn, *Exhibit 73 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Marriage Record of Donna Faye Edmondson to Orlando Juan Henderson states that the father of Donna Faye Edmondson was Bruel Edward Edmondson and the maiden name of the mother of Donna Faye Edmondson was Christina Glenn, *Exhibit 73 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Last Will and Testament of Bruel E. Edmondson, Jr., states that the three children of Bruel E. Edmondson, Jr., are Keith Edward Edmondson, Donna Faye Henderson, and Melvin Wayne Edmondson, *Exhibit 71 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and*

incorporated herein by reference. Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Donna Henderson resides at 1055 E. Home Road, Springfield, OH 45503. Your Attorney Ad Litem has spoken to Donna Henderson by telephone. She stated that she has looked, and she has not located any additional family records in her possession.

11. Your Attorney Ad Litem submits to the Court that Seyi Lamar Johnson born March 5, 1974, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that he is of the Sixth Degree of Kinship to the decedent. Seyi Lamar Johnson is the son of Richard Lamar Arnold and Brenda Darlyne Singleton-Johnson, and Brenda Darlyne Singleton was

the daughter of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Seyi Lamar Johnson states that the father of Seyi Lamar Johnson was Richard Lamar Arnold and the name of the mother of Seyi Lamar Johnson was Brenda Darlene Johnson, *Exhibit 69 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age

4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Seyi Johnson resides at 126 East Hudson, Dayton, OH 45405.

12. Your Attorney Ad Litem submits to the Court that Andrea Kay Scott-Johnson born August 4, 1962, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that she is of the Sixth Degree of Kinship to the decedent. Andrea Kay Scott-Johnson is the daughter of Richard Cecil Scott and Helen Frances Carson-Scott, and Richard Cecil Scott was the son of Lloyd W. Scott, Sr., and Nola Dean-Scott, and Nola Dean Scott was the daughter of James Dean and Selina Edmondson-Dean, and Selina Edmondson-Dean was the sister of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Andrea Kay Scott states that the parents of Andrea Kay Scott were Helen and Richard Scott, *Exhibit 27 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Record of Death of Richard Scott states that he is survived by his wife Helen Carson Scott, that his father was Lloyd Scott and his mother's maiden name was Nola Dean, *Exhibit 21 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the obituary for Richard Scott states that he was the son of Lloyd and Nola (Dean) Scott, that his grandparents were Selena and James Dean, that he is survived by his wife Helen (Carson) Scott, and that he is also survived by four daughters and three sons-in-law, Nola and Omar Dawan, Deborah McIntyre, Karen and Lance

Kelley, and, Andrea and Charles Johnson, *Exhibit 23 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the 1930 Federal census records for Springfield, Ohio, show a household which included the father James Dean, Mother Selinda Dean, daughter Bessie Dean, daughter Nola Scott, grandson Loyd Scott, and grandson Richard Scott, *Exhibit 15 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Andrea Johnson resides at 8505 Morgan Street, Pickerington, OH 43147.

13. Your Attorney Ad Litem submits to the Court that Earnest Eugene Johnson, Jr., born May 8, 1971, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that he is of the Sixth Degree of Kinship to the decedent. Earnest Eugene Johnson, Jr., is the son of Earnest Eugene Johnson and Brenda Darlyne Singleton-Johnson, and Brenda Darlyne Singleton was the daughter of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Earnest Eugene Johnson, Jr., states that the father of Earnest Eugene Johnson, Jr., was Earnest Eugene Johnson and the name of the mother of Earnest Eugene Johnson, Jr., was Brenda Darlene Johnson, *Exhibit 68 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Last Will and Testament of

Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Earnest Johnson, Jr., resides at 2032 Marilyn Avenue, Apartment B, Columbus, OH 43219.

14. Your Attorney Ad Litem submits to the Court that Karen Sue Scott-Kelley born July 11, 1958, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that she is of the Sixth Degree of Kinship to the decedent. Karen Sue Scott-Kelley is the daughter of Richard Cecil Scott and Helen Frances Carson-Scott, and Richard Cecil Scott was the

son of Lloyd W. Scott, Sr., and Nola Dean-Scott, and Nola Dean Scott was the daughter of James Dean and Selina Edmondson-Dean, and Selina Edmondson-Dean was the sister of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Karen Sue Scott states that the parents of Karen Sue Scott were Richard and Helen Scott, *Exhibit 29 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Record of Death of Richard Scott states that he is survived by his wife Helen Carson Scott, that his father was Lloyd Scott and his mother's maiden name was Nola Dean, *Exhibit 21 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the obituary for Richard Scott states that he was the son of Lloyd and Nola (Dean) Scott, that his grandparents were Selena and James Dean, that he is survived by his wife Helen (Carson) Scott, and that he is also survived by four daughters and three sons-in-law, Nola and Omar Dawan, Deborah McIntyre, Karen and Lance Kelley, and, Andrea and Charles Johnson, *Exhibit 23 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the 1930 Federal census records for Springfield, Ohio, show a household which included the father James Dean, Mother Selinda Dean, daughter Bessie Dean, daughter Nola Scott, grandson Loyd Scott, and grandson Richard Scott, *Exhibit 15 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Karen Kelly resides at 4504 Dunnwood Lane, Springfield, OH 45503-6822. Your Attorney Ad Litem has spoken to Karen Kelly by telephone. She stated that she and her mother would go through their records and photo albums

and email copies of documents and photographs with notes of who was pictured in the photographs and when the photos were taken. At the time of writing this Revised Motion, no email, no photos, and no documents have been received from Karen Kelly.

15. Your Attorney Ad Litem submits to the Court that Deborah Scott-McIntyre born March 11, 1954, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that she is of the Sixth Degree of Kinship to the decedent. Deborah Scott-McIntyre is the daughter of Richard Cecil Scott and Helen Frances Carson-Scott, and Richard Cecil Scott was the son of Lloyd W. Scott, Sr., and Nola Dean-Scott, and Nola Dean Scott was the daughter of James Dean and Selina Edmondson-Dean, and Selina Edmondson-Dean was the sister of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Deborah Scott states that the father of Deborah Scott was Richard Cecil Scott and that the mother of Deborah Scott was Helen Frances Scott, *Exhibit 31 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Record of Death of Richard Scott states that he is survived by his wife Helen Carson Scott, that his father was Lloyd Scott and his mother's maiden name was Nola Dean, *Exhibit 21 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the obituary for Richard Scott states that he was the son of Lloyd and Nola (Dean) Scott, that his grandparents were Selena and James Dean, that he is survived by his wife Helen (Carson) Scott, and that he is also survived by four daughters and three sons-in-law, Nola and Omar Dawan, Deborah McIntyre, Karen and Lance Kelley, and, Andrea and Charles Johnson,

Exhibit 23 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference. Your Attorney Ad Litem also states that the 1930 Federal census records for Springfield, Ohio, show a household which included the father James Dean, Mother Selinda Dean, daughter Bessie Dean, daughter Nola Scott, grandson Loyd Scott, and grandson Richard Scott, *Exhibit 15 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Deborah McIntyre resides at 1501 E. 191 Street, J523, Euclid, OH 44117.

16. Your Attorney Ad Litem submits to the Court that Hershall Eugene Scott born May 19, 1944, in Springfield, Clark County, Ohio, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that he is of the Sixth Degree of Kinship to the decedent. Hershall Eugene Scott is the son of Lloyd W. Scott, Jr., and Bertha M. Long-Scott, and Lloyd W. Scott, Jr., was the son of Lloyd W. Scott, Sr., and Nola Dean-Scott, and Nola Dean Scott was the daughter of James Dean and Selina Edmondson-Dean, and Selina Edmondson-Dean was the sister of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Hershall Eugene Scott states that the father of Hershall Eugene Scott was Lloyd W. Scott and the maiden name of the mother was Bertha Long, *Exhibit 18 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the 1930 Federal census records for Springfield, Ohio, show a household which included the father James Dean, Mother Selinda Dean, daughter Bessie Dean, daughter Nola Scott, grandson Loyd Scott,

and grandson Richard Scott, *Exhibit 15 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Hershall Scott resides at 4049 Donegal Street, Dayton, OH 45426.

17. Your Attorney Ad Litem submits to the Court that Bruce Douglas Singleton born March 29, 1952, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Bruce Douglas Singleton is the son of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Bruce Douglas Singleton states that the parents of Bruce Douglas Singleton were Elmer Grant and Martha Elizabeth Singleton, *Exhibit 63 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem

further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmondson - age 49 married to wife Sarah - age 47 and children Salena Edmondson - age 19, John T. Edmondson - age 16, Edgar Edmondson - age 13, Benjamin Edmondson - age 12, May B. Edmondson - age 10, Guy Edmondson - age 7, Burel Edmondson - age 4, and Elick Edmondson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Bruce Singleton resides at 10405 Southeast 172nd Street, Apartment #5, Renton, WA 98055.

18. Your Attorney Ad Litem submits to the Court that Grant Lamar Singleton born April 21, 1947, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Grant Lamar Singleton is the son of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Grant Lamar Singleton states that the father of Grant Lamar Singleton was Elmer Grant Singleton and that the maiden name of the mother was Martha Elizabeth Edmondson, *Exhibit 61 to the Proof of*

Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference. Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Grant Singleton resides at 489 Hickory Hills Drive, Stone Mountain, GA 30083.

19. Your Attorney Ad Litem submits to the Court that Miles Nelson Singleton born September 25, 1955, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary

Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Miles Nelson Singleton is the son of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Miles Nelson Singleton states that the father of Miles Nelson Singleton was Elmer Grant Singleton and that the maiden name of the mother was Martha Elizabeth Edmondson, *Exhibit 62 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin

Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Miles Singleton resides at 10405 Southeast 172nd Street, Apartment #5, Renton, WA 98055. This appears to be the same address as Bruce Singleton.

20. Your Attorney Ad Litem submits to the Court that Edwin Tyrone Singleton born August 1, 1958, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Edwin Tyrone Singleton is the son of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Edwin Tyrone Singleton states that the father of Edwin Tyrone Singleton was Elmer Grant Singleton and that the maiden name of the mother was Martha Elizabeth Edmondson, *Exhibit 64 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the obituary for Bruel

Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Edwin Singleton resides at 2320 Williamsburg Drive, Apartment A, Cincinnati, OH 45225.

21. Your Attorney Ad Litem submits to the Court that Edmund Jerome Singleton born August 1, 1956, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Edmund Jerome Singleton is the son of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Edmund Jerome Singleton states that the father of Edmund Jerome Singleton was Elmer Grant Singleton and that the maiden name of the mother was Martha Elizabeth Edmondson, *Exhibit 65 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference*. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Edmund Singleton resides at 2320 Williamsburg Drive, Apartment A, Cincinnati, OH 45225. This appears to be the same address

as Edwin Singleton.

22. Your Attorney Ad Litem submits to the Court that Kevin Lamont Singleton born September 11, 1949, in Springfield, Clark County, Ohio, is a first cousin once removed of the decedent, Mary Alice Dunn, and that he is of the Fifth Degree of Kinship to the decedent. Kevin Lamont Singleton is the son of Elmer Grant Singleton and Martha Elizabeth Edmondson-Singleton, and Martha Elizabeth Edmondson-Singleton was the daughter of Bruel Edward Edmondson, Sr., and Favola Mitchell-Edmondson, and Bruel Edward Edmondson, Sr., was the brother of Guy Edmondson, and Guy Edmondson was the decedent's father.

In support of this assertion, your Attorney Ad Litem states that the Birth Certificate of Kevin Lamont Singleton states that the father of Kevin Lamont Singleton was Elmer Grant Singleton and that the maiden name of the mother was Martha Elizabeth Edmondson, *Exhibit 66 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Last Will and Testament of Bruel Edward Edmondson, Sr., states that the two children of Bruel Edward Edmondson, Sr., are Martha Elizabeth Singleton and Bruel Edward Edmondson, Jr., *Exhibit 59 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem also states that the obituary for Bruel Edward Edmondson, Sr., states that he was the father of Mrs. Martha Singleton and Bruel E. Edmondson, Jr., *Exhibit 58 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the Certificate of Death of Bruel Edward Edmondson, Sr., states that John Henry Edmondson was his father and that the maiden name of his mother was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by*

attorney Terry T. Wiens, and incorporated herein by reference. Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Kevin Singleton resides at 1315 Wyoming Street, Dayton, OH 45410.

23. Your Attorney Ad Litem submits to the Court that Donna Maria Edmondson-Tucker born November 13, 1955, in Detroit, Michigan, is a first cousin once removed of the decedent, Mary Alice Dunn, and that she is of the Fifth Degree of Kinship to the decedent. Donna Maria Edmondson-Tucker is the daughter of Solon Edmondson and Dorothy Ann Brown-Edmondson, and Solon Edmondson was the son of Benjamin Edmondson and Marie “Mamie” James-Edmondson, and Benjamin Edmondson was the brother of Guy Edmondson, and Guy Edmondson was the decedent’s father.

In support of this assertion, your Attorney Ad Litem states that the Marriage License of Donna Maria Edmondson to Bennie James Tucker, III, states that the father of Donna Maria Edmondson was Solon Edmondson and that the maiden name of the mother was Dorothy Ann Brown, *Exhibit 46 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated herein by reference.* Your Attorney Ad Litem further states that the death notice of Benny Eslick

Edmondson states that said Benny Eslick Edmondson was preceded in death by brothers Solon Edmondson and Boston Edmondson, and by sister Jean, *Exhibit 50 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein.* Your Attorney Ad Litem also states that the Federal Census Record of 1930 lists in Fairfield, Jefferson County, Alabama, a household containing Ben Edmondson - age 42, married to wife Mamie Edmondson - age 29, and children Boston Edmondson - age 16, Solon Edmondson - age 8, Marjorie Edmondson - age 4 and 9/12, and Delores Edmondson - age 1 and 8/12, *Exhibit 37 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein.* Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49 married to wife Sarah - age 47 and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference.* The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Donna Tucker resides at 5678 Big Pine Drive, Ypsalanti, MI 48197.

24. Your Attorney Ad Litem submits to the Court that Stephen Dwayne Belser born August 21, 1965, in Birmingham, Jefferson County, Alabama, is a first cousin twice removed of the decedent, Mary Alice Dunn, and that he is of the Sixth Degree of Kinship to the decedent. Mr. Stephen Dwayne Belser is the son of James Belser and Virginia Edmondson-Belser, and Virginia Edmondson-Belser was the daughter of Benny Eslick Edmondson and Ida J. Covington-Edmondson,

and Benny Eslick Edmondson was the son of Benjamin Edmondson and Marie “Mamie” Edmondson, and Benjamin Edmondson was the brother of Guy Edmondson, and Guy Edmondson was the decedent’s father.

Your Attorney Ad Litem states that the Birth Certificate of the decedent, Mary Alice Edmondson-Dunn, states that the decedent was born on May 27, 1920 in the 6th Civil District of Giles County, Tennessee, the decedent’s father was twenty six (26) at the time of decedent’s birth and his name was Guy Edmondson, and that decedent’s mother was twenty three (23) at the time of decedent’s birth and her maiden name was Mary Colverson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit A*. Your Attorney Ad Litem further states that the Certificate of Death of Guy Edmondson states that Guy Edmondson died March 23, 1974 in Akron, Ohio, and that his father’s name was John Henry Edmondson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn as Exhibit C*. Your Attorney Ad Litem also states that the Federal Census Record of 1900 lists in the 6th Civil District of Giles County, Tennessee a household consisting of John H. Edmundson - age 49, married to wife Sarah - age 47, and children Salena Edmundson - age 19, John T. Edmundson - age 16, Edgar Edmundson - age 13, Benjamin Edmundson - age 12, May B. Edmundson - age 10, Guy Edmundson - age 7, Burel Edmundson - age 4, and Elick Edmundson - age 1, *Exhibit 9 to the Proof of Heirship file by attorney Terry T. Wiens, and incorporated herein by reference*. Your Attorney Ad Litem further states that the newspaper Death Notice for Guy Edmondson states that Guy Edmondson was born in Pulaski, Tennessee, which is in Giles County, that Guy Edmondson moved to Akron, Ohio in 1926, and that he was survived by a brother, Rev. B. B. Edmondson, *attached to Motion of Attorney Ad Litem to Declare Certain Persons to be Heirs of Mary Alice Dunn*

as Exhibit D. Your Attorney Ad Litem also states that the Certificate of Death of Bruel Edward Edmondson states that he died October 19, 1980 in Cincinnati, Ohio, that he was a retired minister, that his father's name was John Henry Edmondson, and that his mother's maiden name was Sarah Emmons, *Exhibit 56 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein*. Your Attorney Ad Litem further states that the death notice of Benny Eslick Edmondson states that said Benny Eslick Edmondson was preceded in death by brothers Solon Edmondson and Boston Edmondson, and by sister Jean, *Exhibit 50 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein*. Your Attorney Ad Litem also states that the Federal Census Record of 1930 lists in Fairfield, Jefferson County, Alabama, a household containing Ben Edmondson - age 42, married to wife Mamie Edmondson - age 29, and children Boston Edmondson - age 16, Solon Edmondson - age 8, Marjorie Edmondson - age 4 and 9/12, and Delores Edmondson - age 1 and 8/12, *Exhibit 37 to the Proof of Heirship filed by attorney Terry T. Wiens, and incorporated by reference herein*. The list of addresses and telephone numbers provided by Mr. Wiens to your Attorney Ad Litem on September 22, 2010 states that Stephen Belser resides at 11420 Encore Drive, Silver Spring, MD 20901.

WHEREFORE, Keith A. Turner, Attorney Ad Litem for Unknown Heirs PRAYS AS FOLLOWS:

1. That the Court review the documents filed by attorney Terry T. Wiens, the documents filed with your Attorney Ad Litem's Motion to Declare Certain Persons to be Heirs of Mary Alice Dunn on February 25, 2010, and the documents filed with this Motion.
2. That the Court enter an Order declaring the persons submitted to be Heirs of Mary Alice Dunn in this Motion to be her Heirs

3. For such general, other and further relief which the Court may deem appropriate.

Respectfully submitted:

Keith A. Turner, BPR # 20545
Attorney Ad Litem for Unknown Heirs of Mary A. Dunn
Washington Square, Suite 360-M
222 Second Avenue North
Nashville, TN 37201
Telephone: (615) 234-3947
Facsimile: (615) 234-3948

CERTIFICATE OF SERVICE

_____The undersigned, Keith A. Turner, hereby certifies that a true and correct copy of the foregoing was served by Hand Delivery to Mr. Thomas H. Ware, Esq., Attorney for Administrator, 1800 Parkway Towers, 404 James Robertson Parkway, Nashville, TN 37219, and by email without attachments and exhibits to Mr. Terry T. Wiens, Esq., twiensatty@aol.com, this 8th day of October, 2010.

Keith A. Turner

THE HEARING ON THIS MOTION OF ATTORNEY AD LITEM TO DECLARE CERTAIN PERSON HEIRS OF DECEDENT WILL BE HELD AT 1:30 P.M. ON THE 13TH DAY OF OCTOBER, 2010, IN JUDGE KENNEDY'S COURTROOM, IN THE SEVENTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, AT NASHVILLE.