

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

AFFIDAVIT

Personally appears before me Mrs. Ella Jones
who being duly sworn says that he or she is 82 years of age,
is a ^{farmer} member of the Standing Springs Baptist Church which is
located about 3 1/2 miles west of the Town of Simpsonville
in the County and State aforesaid on the Georgia Road; that
deponent has been a member of the said Church for a period
of approximately 39 years and has resided in the community
where the said Church is located for his or her entire life;
that deponent is thoroughly familiar with the location and the
surroundings of the said Church building and a cemetery.

Deponent still further says that he or she has resided
in the Simpsonville-Standing Springs Church Community for a
period of 82 years and during that entire time the Standing
Springs Baptist Church has occupied the lands which it presently
occupies claiming to be the owner thereof and this deponent
has never at any time heard any rumors or statements to the ef-
fect that its title to the entire Church lands was not a good
marketable fee simple title. Its ownership and occupancy of
these lands has been open, notorious and exclusive with the
said Church evidencing its ownership as against the entire
world by erecting thereon buildings and a cemetery and the
using of the Church grounds for parking spaces, picnics and
such like.

The present Church building located on the said grounds
has been there for more than sixty (60) years and Church his-
tory has it that the present building is the fourth structure
which has reected there. An inspection of the cemetery shows
grave stones evidencing burials made in the said cemetery more
than one hundred (100) years ago.