

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

## AFFIDAVIT

Personally appears before me R.C. Halcombe  
who being duly sworn says that he or she is 68 years of age,  
is a 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 de-  
ponent has been a member of the said Church for a period of  
approximately 36 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 68 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 state-  
ments to the effect 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 rested there. An inspection of the cemetery shows  
grave stones evidencing burials made in the said cemetery more  
than one hundred (100) years ago.