

STATE OF SOUTH CAROLINA
 COUNTY OF GREENVILLE

A F F I D A V I T

Personally appeared before me Earle B. Epps who after being duly sworn does depose and say as follows:

That he is the son of James Luther Epps who died on January 24, 1938. That the deponent's mother was M. E. Epps who died prior to 1930; that James Luther Epps did marry a second time to one Maggie Epps who had a child by a former marriage by the name of Toy Cox; that there were born unto James Luther Epps and Maggie Epps the following children, to-wit: Willie Epps Brown, James Luther Epps, Jr., Audrey E. Robertson, Andrew McClure Epps, Charles Beaty Epps, Wallace Eugene Epps, Christine Epps and the deponent does know of his own knowledge that at the time Maggie Epps died, Toy Cox and the above listed children of J. Luther and Maggie Epps were the sole heirs of Maggie Epps as far as children were concerned and her husband, James Luther Epps was the remaining heir and distributee at law.

That the deponent, Earle B. Epps, and his brother, Edgar F. Epps were children born unto James Luther Epps and M. E. Epps and that the deponent is not kin to Maggie Epps except by a step-mother relation.

Sworn to before me this
 28th day of February, 1959.

Joe A. Phillips (SEAL)
 Notary Public for S. C.

Earle B. Epps