

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

AFFIDAVIT

Personally appears before me M. L. Richardson  
who being duly sworn says that he or she is 86 years of age,  
is a <sup>former</sup> 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 ~~was~~ <sup>was</sup> a member of the said Church for a period  
of approximately 19 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 86 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 rested there. An inspection of the cemetery shows  
grave stones evidencing burials made in the said cemetery more  
than one hundred (100) years ago.