

3. The Defendants, the Heirs and Unknown Heirs, Personal Representatives, Devisees, Trustees, Successors and Assigns of Ira N. Jones, Deceased, appear by the records of the County Clerk of Tulsa County, Oklahoma, to be claiming some right, title, or interest in or to the property by virtue of a Warranty Deed filed of record August 15, 1936, in Book 1199, at Page 58, records of Tulsa County, Oklahoma.

4. Upon information and belief, Ira N. Jones died on or about March 2, 1995.

5. The claims of the Defendants are adverse to the Plaintiff and the nature and extent of which claims known to the Plaintiff being herein set forth; that in truth and in fact, the Defendants have absolutely no right, title, interest, estate, equity or lien in and to the real estate involved or improvements located thereon, or minerals thereunder in this action or any part or parcel thereof in the pretended, or recorded instruments appearing to be claims to an interest therein are wholly without merit or basis either in fact or in law or in equity, and such claims constitute clouds on the title to said real estate which present the plaintiff from enjoying the full and complete fee simple title ownership and possession of said real estate and Plaintiff is entitled to have said claims adjudged and decreed to be null and void and the instruments evidencing the same cancelled at record and held for naught.

6. The Plaintiff owns the absolute, indefeasible fee simple record title to the above-described property by virtue of the following instrument: General Warranty Deed as shown in the abstract from City of Broken Arrow to Eva R. Jones, a single person, dated September 10, 2013, filed on October 4, 2013, with Document No. 2013100354. A copy of same is attached hereto and is marked Exhibit "A."

WHEREAS, premises considered, the Plaintiff prays for a judgment against the Defendants, and each of them, for quieting and confirming the legal, equitable title and in fee simple to and in possession of the real estate involved in this action and the Plaintiff, in

adjudging the Defendants, and each of them, to have no right, title, interest, estate, equity or lien therein or thereto, and forever barring and excluding them therefrom enjoining them and all persons claiming by, through or under them, or either of them, from ascertaining any claim or interest in said real estate adverse to the fee simple title of Plaintiff; and as an incident to the quieting of the title to said real estate, Plaintiff prays that the instruments described in the Petition and clouding the title in and to said real estate be removed as clouds on the title of said real estate; and for such other and further relief as the Court deems equitable.

Respectfully Submitted,

BETH ANNE WILKENING
CITY ATTORNEY

By: _____
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VERIFICATION

Having read the foregoing document in my capacity as City Manager for the Plaintiff, City of Broken Arrow, Oklahoma, I hereby swear that the statements are true and correct to the best of my knowledge.

Michael L. Spurgeon, City Manager

STATE OF OKLAHOMA)
) SS:
COUNTY OF TULSA)

SUBSCRIBED and sworn to before me this _____ day of March, 2016.

NOTARY PUBLIC

MY COMMISSION EXPIRES:
