

IN THE CHANCERY COURT FOR HAYWOOD COUNTY, TENNESSEE

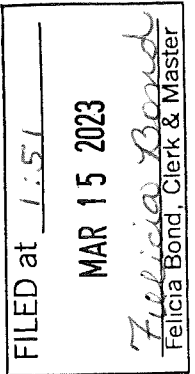
IN RE: RELOCATION OF
WILLS GRAVES AT
8600 HIGHWAY 54 WEST,

CHERYL WILLS AND
MOORELAND FARM, LLC,

Petitioners.

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Docket No. 2023-CH-7



**PETITION FOR DNA TESTING, TERMINATION OF USE OF LAND AS BURIAL
GROUND, AND REMOVAL AND REINTERMENT OF REMAINS
OF SANDY AND EMMA WILLS**

Cheryl Wills and Mooreland Farm, LLC (“Petitioners”), by and through their undersigned counsel, respectfully jointly petition the Court to conduct DNA testing to try to locate Sandy and Emma Wills, to remove and reinter the remains of Sandy and Emma Wills, if located, and thereafter to terminate use of a cemetery in Haywood County as a burial ground for Sandy and Emma Wills. In support of their Petition, Petitioners state as follows:

I. INTRODUCTION

This petition is a request by the great-great-great granddaughter of Sandy and Emma Wills, who are believed to be buried in a cemetery located at 8600 Highway 54 West, Brownsville, Tennessee (the “Property”). Mooreland Farm, LLC owns the Property and joins in this request in support of the family. Sandy Wills served in the Armed Forces of the United States during the Civil War and was honored by President Obama for his service. Through this Petition, Petitioners seek to locate the graves of Sandy and Emma Wills, identify them through DNA testing, and relocate their graves to a military cemetery.

Historical records obtained by the family strongly support that Sandy and Emma Wills are buried on the Property; however, the exact location of their graves is unknown. There are several individuals buried at the Property, but due to lack of headstones and other information, Petitioners are unsure of the exact identities of those buried at the cemetery. Accordingly, Petitioners seek

permission from this Court to obtain DNA samples from several graves on the Property, in the hope of positively identifying Sandy and Emma Wills. If successful, Petitioners request permission to relocate Sandy's and Emma's graves and rebury them in a military cemetery.

II. PARTIES AND JURISDICTION

1. Cheryl Wills is the great-great-great granddaughter of Sandy and Emma Wills.
2. Mooreland Farm, LLC is a Tennessee limited liability company that owns the Property.
3. The cemetery at issue (the "Cemetery") is located at the Property in Haywood County. Accordingly, jurisdiction and venue are proper in this Court pursuant to Tenn. Code Ann. § 46-4-103(a).
4. The persons believed to be buried in the Cemetery include the following: Sandy Wills (born 1840; died February 8, 1889); Emma Wills (born 1851; died May 30, 1901); Adolphus West (born 1826; died circa 1897) and Millie Estes Moore West (born 1845; died 1920).
5. Pursuant to Tenn. Code Ann. § 46-4-103(b), necessary respondents in this proceeding are all "interested persons" ("Interested Persons"), which are defined in Tenn. Code Ann. § 46-4-102 as the following:

As used in this chapter, unless context otherwise requires, "interested persons" means any and all persons who have any right or easement or other right in, or incident or appurtenant to, a burial ground as such, including the surviving spouse and children, or if no surviving spouse or children, **the nearest** relative or relatives by consanguinity of any one (1) or more deceased persons whose remains are buried in any burial ground.

(emphasis added).

6. In this case, Petitioners have discussed the Petition with certain known living descendants of Sandy and Emma Wills, as well as a descendant of Emma's father, Adolphus West, who may be buried at the cemetery. These descendants have provided their support of this Petition through the declarations attached hereto as **Collective Exhibit A**.

7. For any other unknown Interested Persons, Petitioners request that the Court cause notice to be made to all unknown Interested Persons by publication in a newspaper of general circulation in Haywood County, Tennessee, for four consecutive weeks. Tenn. Code Ann. § 46-4-103(b) provides, in part, that: “Nonresident and unknown defendants may be proceeded against by order of publication, and publication, in the manner provided by law.” *See also* Tenn. Code Ann. § 21-1-204 (detailing service by publication in Tennessee).

8. In addition, Petitioners are providing the requisite notice to the Tennessee Historical Commission pursuant to Tenn. Code Ann. § 46-4-103(c).

III. FACTS

9. Ms. Wills and her family have spent a significant amount of time and effort trying to locate Sandy and Emma Wills.

10. Through their research, Ms. Wills learned that Adolphus West, who was a formally enslaved person, lived on the Property during his lifetime and held the title of Farm Manager. He had several children, including Emma West.

11. Sandy Wills lived in Brownsville, but left to fight for the United States Army in the United States Colored Troops 4th Regiment Heavy Field Artillery, stationed originally at Fort Pillow. After his service, Mr. Wills returned to Brownsville and became a sharecropper on the Property, eventually marrying Emma on February 11, 1869 at the Property. They had nine children together, all of whom were born on the Property.

12. Census reports and other historical documents, such as affidavits, show that both Sandy and Emma lived on the Property during their lifetimes. When Sandy died in February 1889, it is strongly believed that he would have been buried in the Cemetery on the Property. Likewise, Petitioners believe that Emma was buried on the Property when she died in 1901.

13. In order to evaluate the Cemetery on the Property, Petitioners engaged the services of Jarrod Burks, PhD of Ohio Valley Archaeology, Inc. (“OVAI”). Dr. Burks is the Director of Archaeological Geophysics with OVAI and has served as an archaeological Principal Investigator with OVAI since 1999. Prior to OVAI, Dr. Burks served as an Archeology Technician with the National Park Service from 1998 to 2003. He holds a PhD in Anthropology (Archaeology) from Ohio State University and a Bachelor of Arts in Anthropology from the University of Illinois. He is an expert in the use of geophysical instruments in archaeology, such as magnetometers and ground-penetrating radar, and he has conducted geophysical surveys all across the country and beyond, including on missions to search for missing U.S. servicemen.

14. Dr. Burks and OVAI have conducted a geophysical survey of Cemetery, which included studies involving ground penetrating radar, magnetometer, and electromagnetic induction meter. As a result, Dr. Burks identified thirty-eight potential graves at the Cemetery, with twenty-five being probable graves and thirteen being possible graves. However, Dr. Burks has identified eight graves which by their size are believed to contain adult decedents. He recommends that those graves be excavated for DNA testing.

15. Dr. Burks and OVAI recommend that a three-step excavation process be used to locate and identify Sandy and Emma Wills as follows: (1) hand excavation; (2) backhoe removal of the middle part of the grave shaft; and (3) hand excavation of the coffin and remains at the bottom of the grave. Any bones that are located will be cleaned and examined by a forensic specialist to determine characteristics such as sex, height, age at death, and pathology. Samples for DNA analysis will be taken only from adult males and females who match Sandy and Emma’s characteristics of age and height at death. Once DNA samples are collected, all remains will be reburied within their original graves to await DNA testing results.

16. If Sandy and Emma are located through DNA testing, Dr. Burks and OVAI will perform the removal and reinterment process. This process, along with the DNA testing above, will be conducted with due care and decency for the decedents in accordance with Tenn. Code Ann. § 46-4-104.

17. Accordingly, Petitioners respectfully request permission from this Court to conduct DNA testing to locate Sandy and Emma Wills. If located, Petitioners seek leave to terminate the use of the Cemetery as a burial ground for Sandy and Emma and to have their remains removed from the current location of the Cemetery and reburied in a military cemetery as permitted by Tenn. Code Ann. § 46-4-103(a).

18. Tenn. Code Ann. § 46-4-101 supports termination of the use of land as a cemetery when: “(1) The burial ground is abandoned; (2) The burial ground is in a neglected or abandoned condition; or (3) The existence of any conditions or activities about or near the burial ground that the court finds render the further use of the burial ground for the purposes mentioned in this section that are inconsistent with due and proper reverence or respect for the memory of the dead, or for any other reason unsuitable for those purposes.”

19. Here, although the property owners have taken steps throughout the years to protect and preserve the Cemetery, the Cemetery is unmarked with any headstones or gravestones, such that it is impossible to know who is buried in what location by simply observing the cemetery. Further, there is significant tree growth around and through the Cemetery, and it is believed that these trees have been in place since at least the 1940’s.

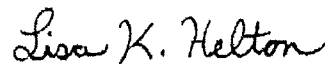
20. Based on these facts, the Petitioners assert that the Cemetery meets the statutory definition of abandoned and/or neglected, such that identification and relocation is permitted pursuant to Tenn. Code Ann. § 46-4-101.

21. After the graves of Sandy and Emma Wills are relocated, the other graves at the Cemetery will remain in place, and the Cemetery will continue to be preserved.

WHEREFORE, Petitioners respectfully request that the Court:

1. In accordance with Tenn. Code Ann. §§ 21-1-204 and 46-4-103, enter an Order authorizing notice to all unknown Interested Persons by publication in a newspaper of general circulation in Haywood County, Tennessee, for four consecutive weeks;
2. Permit Petitioners to conduct DNA testing on graves found at the Cemetery in the manner described in this Petition;
3. If Sandy and Emma Wills are positively located, permit Petitioners to remove their remains from the Property, terminate use of the Property as a burial ground on behalf of Sandy and Emma Wills only, without affecting the remaining decedents in the Cemetery, and reinter the remains of Sandy and Emma Wills at a military cemetery in accordance with Tenn. Code Ann. §§ 46-4-101 and 46-4-104; and
4. For such further and general relief as may be appropriate.

Respectfully submitted,



Lisa K. Helton, #023684
SHERRARD, ROE, VOIGT & HARBISON, PLC
150 Third Avenue South, Suite 1100
Nashville, TN 37201
Tel: (615) 742-4525 | Fax: (615) 742-4539
lhelton@srvhlaw.com

*Counsel for Cheryl Wills and Mooreland
Farm, LLC*

DECLARATION

I, Anthony Wills, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.

2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.

3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.

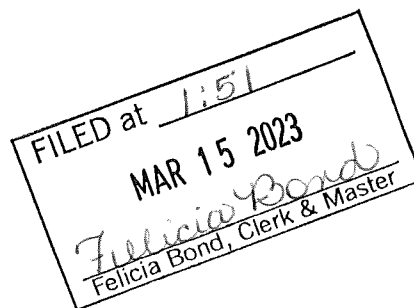
4. I have had an opportunity to review the Petition.

5. I consent to the relief requested in the Petition.

6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.

7. I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:
Anthony Wills 3/11/2023
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Signature Date



**EXHIBIT
A**

DECLARATION

I, Brenda Redmond, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

Brenda Redmond 3/11/2023
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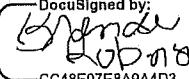
Signature

Date

DECLARATION

I, Brenda Robinson, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

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Signature

3/10/2023

Date

DECLARATION

I, Delorise Bates Taylor, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

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Signature

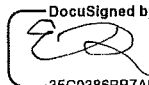
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Date

DECLARATION

I, Erin Russell, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

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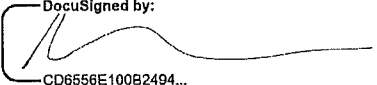
Signature

Date

DECLARATION

Matthew Wills
I, _____, state as follows:

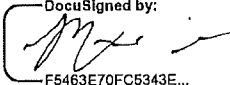
1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

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Signature _____ Date _____

DECLARATION

I, Meaghan Wills, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

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Signature

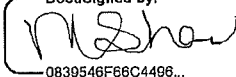
3/10/2023

Date

DECLARATION

I, MELLISSA SHAW, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

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3/10/2023

Signature

Date

DECLARATION

I, Michelle Robateau, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

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	3/10/2023
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Signature	Date

DECLARATION

Theresa Robinson
I, _____, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

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Signature

3/10/2023

Date

Celestial Wills Jackson **DECLARATION**
state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.

2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: SANDY + EMMA WILLS

3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.

4. I have had an opportunity to review the Petition.

5. I consent to the relief requested in the Petition.

6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.

7. I declare under penalty of perjury that the foregoing is true and correct.

C. Jackson
Signature

03/12/2023

Date

DECLARATION

1. John Singleton III state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.

2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: SANDY WILLS + EMMA WILLS

3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.

4. I have had an opportunity to review the Petition.

5. I consent to the relief requested in the Petition.

6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.

7. I declare under penalty of perjury that the foregoing is true and correct.

John Singleton III
Signature

3/12/23
Date

DECLARATION

Christina Wills state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: SANDY + EMMA WILLS
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

Christina Wills 3-13-23
Signature Date

DECLARATION

I, Elyah Jackson, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: SANDY + EMMA WILLS
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

Elyah Jackson 2/13/23
Signature Date

DECLARATION

I Cleavon Wills state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: SANDY + EMMA WILLS.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

Cleavon Wills
Signature

3-13-23
Date

DECLARATION

I, Crystal Wills, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Sandy Wills and Emma Wills.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

Crystal Wills 3/12/2023

Signature

Date

DECLARATION

1. Clarence Wills Jr. state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.
2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: SANDY + EMMA WILLS.
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.
4. I have had an opportunity to review the Petition.
5. I consent to the relief requested in the Petition.
6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.
7. I declare under penalty of perjury that the foregoing is true and correct.

CLARENCE WILLS 3-13-23
Signature Date

DECLARATION

I, Ethan West, state as follows:

1. I am over the age of eighteen (18) and am competent to make the statements contained in this Declaration.

2. I am a descendant of the following persons believed to be buried at the Cemetery located at 8600 Highway 54 West, Brownsville, Tennessee: Dolphin West and Millie West

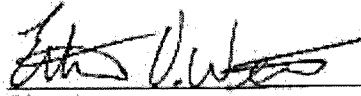
3. I have received a copy of the Petition for DNA Testing, Termination of Use of Land as Burial Ground, and Removal and Reinterment of Remains of Sandy and Emma Wills by Cheryl Wills and Mooreland Farm, LLC.

4. I have had an opportunity to review the Petition.

5. I consent to the relief requested in the Petition.

6. I do not wish to be a party to any lawsuit regarding the Petition and waive any and all right to participate in those legal proceedings, including service of process of the petition.

7. I declare under penalty of perjury that the foregoing is true and correct.

 3-12-23
Signature Date