

**IN THE CHANCERY COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

ELIZA A. PRESLEY,

Plaintiff,

v.

CASE NO: _____

**LISA MARIE PRESLEY-LOCKWOOD,
the SURVING HEIR OF VERNON E. PRESLEY
and UNKNOWN HEIRS OF VERNON E. PRESLEY,**

Defendants.

COMPLAINT

Come now the Plaintiff, Eliza A. Presley, by and through her counsel of record, Glenwood P. Roane, Sr., and files this Complaint against Defendants, Lisa Marie Presley-Lockwood, and other unknown heirs of Vernon E. Presley, and would show to the Court the following:

I. JURISDICTION AND VENUE

1. Plaintiff will show to this Court that jurisdiction and venue is appropriate in this court inasmuch as the original action arose in Memphis, Shelby County, Tennessee in the Probate Court of Shelby County, Tennessee.

The Plaintiff is an adult resident citizen of Spokane County, Washington with a mailing address of 407 South ~~B~~errall Street, Spokane, Washington 99202.

2. The Defendant, Lisa Marie Presley-Lockwood, resides in the State of California, whose address is unknown, and may be reached with service of process by publication.

3. The Defendant, unknown heirs of Vernon E. Presley, whose identity and addresses are unknown, may be reached with service of process by publication.

II. FACTS

1. The Plaintiff herein filed her Petition to Reopen Estate, to Appoint Administrator C.T.A., to Determine Heirship, and to Redistribute Net Estate timely with the Probate Court of Memphis, Shelby County, Tennessee, Cause No. D-5830. An Order Dismissing Without Prejudice Claimant's Claims and Vacating Order Re-Open Estate was entered on January 26, 2009.

2. The Plaintiff would show to this Court, through the attached DNA test results that she is the biological daughter of Vernon Elvis Presley, who died on the 26th day of June, 1979, a citizen and resident of Memphis, Shelby County, Tennessee.

3. The Plaintiff would show to this Court, through the attached DNA test results, that she is the half-sister of Elvis A. Presley,

4. That on June 29, 1979, the Last Will and Testament of Vernon Elvis Presley and the First Codicil to his Last Will and Testament of Vernon Elvis Presley, respectively, as the whole, true Last Will and Testament and First Codicil to Last Will and Testament of Vernon Elvis

Presley, in Cause No. A-4206 was admitted to the Probate Court of Shelby County, Tennessee. Said estate was fully administered, and closed by Order of the Court on September 11, 1985.

5. Said Last Will and Testament and said Codicil did not recognize Eliza A. Presley as his daughter.

6. Eliza A. Presley was born in Pasadena, Texas on January 23, 1962.

7. During Plaintiff's early years as an adult, Eliza A. Presley began to search for her father, to learn his identity.

8. Finally, in mid-summer, 2008, Eliza A. Presley learned for the first time who her biological father was, namely Vernon Elvis Presley; same and known father of Elvis A. and Jessie G. Presley. (See attached DNA test results).

9. This Petition filed in the Probate Court of Shelby County, Tennessee, was filed within 70 days of learning the identity of her father. Petitioner has been diligent in her search, and it is only after recent DNA testing results that she has proof of her parentage. DNA technology was non-existent at the time of Vernon E. Presley's death.

10. Eliza A. Presley is the biological daughter of Vernon Elvis Presley, and is entitled to be recognized as his daughter, and should be determined by this Court, through the attached DNA test results, that she is the daughter of Vernon Elvis Presley and the half-sister of Elvis A. Presley.

11. Notice of this Petition should be served by Summons to the known and unknown surviving heirs of Vernon Elvis Presley, and by publication, namely: Lisa Marie Presley-Lockwood, the only known surviving heir of Vernon Elvis Presley, and other unknown heirs.

III. PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff asks for the following relief:

A. That proper process issue in accordance with law, giving notice to the known and unknown surviving heirs of Vernon Elvis Presley (by publication) and requiring them to show cause if any they might have why relief should not be granted as prayed for;

B. That Eliza A. Presley be declared the daughter of Vernon Elvis Presley and the half-sister of Elvis A. Presley;

C. That Eliza A. Presley be awarded all other relief to which she may be entitled under the premises, including award of her reasonable attorney's fees and court costs.

D. That the attachments of the DNA results be placed under seal until process issues and the matter is before the Court.

Respectfully submitted,

By: 

Glenwood P. Roane, Sr. #021358
217 Exchange Avenue
Memphis, TN 38103
Telephone: (901) 526-1889
Facsimile: (901) 526-1894