

STATE OF SOUTH CAROLINA }
COUNTY OF GREENVILLE }

IN THE COUNTY COURT

Frank Ulmer Lumber Co., Inc.,
Plaintiff,

-vs-

Fountain Inn Builders, Inc.,
Defendant.

COMPLAINT

The plaintiff, complaining of the defendant, would respectfully show to the Court:

1. The plaintiff is a corporation organized under the laws of the State of South Carolina engaged in a building supply business in Greenville County, South Carolina; that the defendant is a corporation organized under the laws of one of the states of the United States engaged in business in Greenville County, South Carolina.

2. That heretofore at the request of the defendant, the plaintiff did sell to the defendant certain building supplies for which the defendant continues to owe the sum of Sixteen Thousand Thirteen and 51/100 (\$16,013.51) Dollars as will appear by reference to an itemized, verified statement of account attached hereto as Exhibit A; that in spite of repeated requests for payment, the defendant has failed and refused to pay this account and does continue to owe the plaintiff the sum of \$16,013.51.

WHEREFORE, the plaintiff requests judgment against the defendant in the sum of Sixteen Thousand Thirteen and 51/100 (\$16,013.51) Dollars and the costs of this action.

GADDY & DAVENPORT

Clifford F. Gaddy Jr.
By: Clifford F. Gaddy Jr.
Attorneys for Plaintiff

May 8, 1974.

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4328-RV-2