

BEGINNING at an iron pin on the southwestern side of Willow Springs Drive, at the joint front corner of Lots Nos. 2 and 3, which iron pin is situate 33 feet southeast of the curved intersection of Willow Springs Drive and Dakota Avenue (Parkins Mill Road) and running thence along the line of Lot No. 2, S. 31-06 W. 163 feet to an iron pin on the northern side of a 5 foot strip of land reserved for utilities, being the rear corner of Lot No. 2; thence along the northern side of said 5 foot strip, N. 54-37 W. 59.1 feet to an iron pin on the northwestern side of Dakota Avenue (Parkins Mill Road); thence along said Avenue, N. 31-06 E. 140 feet to an iron pin; thence following the curved intersection of Willow Springs Drive and Dakota Avenue (Parkins Mill Road), the chord of which is N. 77-28 E. 36.1 feet to an iron pin on the southwestern side of Willow Springs Drive; thence along the southwestern side of Willow Springs Drive, S. 49-34 E. 33 feet to the point of beginning.

That pursuant to the laws of the State of South Carolina, the Plaintiff has attached the above described real property and said real property is made a party to this action.

## IV.

That the Plaintiff has diligently tried to locate the said Richard Aubrey Rozell, Jr., but has been unable to do so and is informed and believes that the Defendant has either departed this state or concealed himself with the intent to defraud creditors, including the Plaintiff.

## V.

That the Defendant has failed and refused to comply with the Order of Judge Epps, and the Plaintiff is informed and believes that she is entitled to have the Defendant's interest in the property described above attached and sold at public sale according to law and to the customs and usage of this Court.

WHEREFORE, the Plaintiff respectfully prays that this Court:

1. Issue its Warrant of Attachment and Order that the Defendant's interest in and to said property be sold according to law and the customs and usage of this Court, and the proceeds of said sale be applied in accordance with the terms of Judge Epp's Order dated November 21, 1975.
2. For such other and further relief as the Court might deem just and proper.

LEATHERWOOD, WALKER, TODD & MANN

By: 

Earle G. Prevost