- (d) That within the past sixty days G & L Builders, Inc., and/or Alvin W. Greene has received cash from its creditors in an amount which is more than enough to pay the indebtedness owed to the plaintiff; however, the funds have not been paid to the plaintiff but have been secreted and hidden away;
- (e) That James A. Ellis believes that G & L
 Builders, Inc., and/or Alvin W. Greene is hindering, delaying and
 defrauding creditors by failing to make payment to the plaintiff
 or to Citizens Builder Mart, Inc., which did assign the subject
 account to the plaintiff and further that G& L Builders, Inc.,
 and Alvin W. Greene are about to assign and dispose of property
 with the intent to hinder, delay and defraud creditors.

James A. Ellis

SWORN to before me this

18 day of October, 1974.

Notary Public for South Carolina
My commission expires: 2-18-79

RECORDED OCT 23'74

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