STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

Frank Ulmer Lumber Co., Inc.,

Plaintiff,

-vs-

COMPLAINT

Town Contractors, Inc., Greenville Associates, Ltd., and First Hartford Realty Corporation,

Defendants.

The plaintiff, complaining of the defendants, would respectfully show to the court:

- l. That the plaintiff is a corporation organized under the laws of the state of South Carolina with its principal place of business in Greenville County, South Carolina; that the defendants Town Contractors, Inc., and First Hartford Realty Corporation are corporations organized under the laws of one of the states of the United States and are doing business in Greenville County, South Carolina; that the defendant Greenville Associates, Ltd., is a partnership doing business in Greenville County, South Carolina.
- 2. That Town Contractors, Inc., is a wholly owned subsidiary of First Hartford Realty Corporation and its business, assets, affairs and officers are so intertwined and comingled with the affairs, business and operations of First Hartford Realty Corporation that it is not an independently operated corporation but is subject completely to the control and domination of First Hartford Realty Corporation so that the corporate entity of Town Contractors, Inc., should be disregarded and the liabilities of Town Contractors, Inc., are the liabilities of First Hartford Realty Corporation.
- 3. That the general partner of Greenville Associates, Ltd., a South Carolina partnership, is First Hartford Realty Corpration; that Greenville Associates, Ltd., is subject to the control and

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