FILED
GREENVILLE CO. S.C.
APR 3 10:13 AM '75
E. T. ERSLEY
R.M.C.

STATE OF SOUTH CAROLINA)
) IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE)

Snelling and Snelling of Greenville, Inc.,

Plaintiff,

vs.

Charles A. Simmons,

Defendant.

COMPLAINT

The Plaintiff complaining of the above named Defendant, would respectfully show unto the court:

I

That the Defendant is a resident of the County of Greenville, State of South Carolina, and has resided in Traveler's Rest, South Carolina, since 1973.

II

That on or about October 8, 1974, Plaintiff and Defendant entered into a contract for the purpose of securing employment for Defendant, a copy of which is attached and incorporated herein.

III

That on October 10, 1974, Plaintiff arranged an employment interview between the Defendant and Ligon Mechanical which took place on October 12, 1974.

IV

That at some time subsequent to the interview, Ligon did in fact hire Defendant and Defendant tried to conceal this information from Plaintiff.

V

That Plaintiff performed all stipulations, conditions and agreements of said contract and by virtue of Defendant's breech is entitled to One Thousand Four Hundred Forty and No/100 ($1,440.00) Dollars damages.

For release see Mtge. Book 16, Page 1282, # 24869, 4-28-75

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