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STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

IN THE COURT OF COMMON PLEAS

Jerry N. Riggins,)
Plaintiff,)
vs.)
Moaitt W. Belcher,)
Defendant.)

COMPLAINT

88-CP-23-1027

FILED CLERK OF COURT
GREENVILLE, S.C.
APR 10 3 07 PM '80
COURT HOUSE

The Plaintiff, complaining of the Defendant herein, would respectfully show to the Court.

I.

The Plaintiff is a citizen and resident of the County of Greenville, State of South Carolina; the Defendant is a citizen and resident of the County of Greenville, State of South Carolina; the real property mortgage, subject matter of this action is on real property located in the County of Greenville and is recorded in the Greenville County R.M.C. Office.

II.

On or about July 12, 1971, the Plaintiff executed and gave to the Defendant a purchase money mortgage in the amount of Four Thousand Thirty-Two and 37/100 (\$4,032.37) Dollars, said mortgage being on that certain property containing 5.86 acres located on Camp Creek Road, Greenville County, said mortgage being recorded in the R.M.C. Office for Greenville County on July 14, 1971, in Mortgage Book 1193, Page 533.

III.

Plaintiff timely made all payments and paid the balance of said mortgage on December 29, 1976, to M.T. Belue of Citizens Building and Loan Association, acting as agent for the Defendant, said agent marking the Plaintiff's schedule of payments "paid in full".

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