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IV.

The Plaintiff, on or about December 29, 1976, requested that Defendant enter satisfaction of the mortgage in the records of the R.M.C. Office for Greenville County, and at that time offered to the Defendant to pay any fees or amounts necessary to accomplish such satisfaction.

V.

Defendant has in the past and does now wrongly refuse to mark said mortgage satisfied and to enter such fact in the appropriate records, and Plaintiff is unable to realize the full value of his property because of the unjust refusals of Defendant.

VI.

Said mortgage has been paid in full and should be cancelled of record in the R.M.C. Office of Greenville County, and Plaintiff requests this Court to so order Donnie S. Tankersley, Register of Mesne Conveyances.

VII.

The Plaintiff is informed and believes further that he is entitled to damages in the amount of Two Thousand Sixteen and 18/100 (\$2,016.18) Dollars, said amount being one-half (1/2) of the mortgage amount and being as provided for by South Carolina law.

WHEREFORE, having fully set forth his complaint, Plaintiff prays as follows:

(1) That the Court declare the mortgage from Plaintiff to Defendant to be satisfied and order the Register of Mesne Conveyances to enter said fact in the appropriate records.

(2) For damages in the amount of Two Thousand Sixteen and 18/100 (\$2,016.18) Dollars as provided by law.

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