

FILED
GREENVILLE CO. S. C.

BOOK 16 PAGE 669

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)
IN THE COUNTY COURT
JAMES W. STAMMERSLEY
CLERK

Charles W. Spence,)
)
Plaintiff,)
-vs-)
)
Martha S. Bruce and Robert H.)
Bruce,)
)
Defendants.)

74-CL-23-1270
COMPLAINT

The Plaintiff, complaining of the above named Defendants,
would respectfully show unto the Court:

I.

That the Defendants are residents of the County of Green-
ville, State of South Carolina, and have resided in Greenville,
S. C., since 1971.

II.

That heretofore, on or about July 26, 1974, Martha S. Bruce
and Robert H. Bruce did employ Charles W. Spence, a practicing
attorney in Greenville County, South Carolina, to institute pro-
ceedings whereby Robert H. Bruce could adopt the two minor of
Martha S. Bruce, have the birth certificate changed and obtain
new passports in order that they might proceed to travel to
France on or about September 5, 1974, as an employee of Michelin
Tire Company. That the Plaintiff performed the work and services
and duly entered the necessary documents and Orders in the Clerk
of Court's Office on or about August 22, 1974.

III.

That the agreed compensation was Three Hundred Fifty and
No/100ths (\$350.00) Dollars plus the Guardianship fee and Court
costs. The Guardianship fee and Court costs plus an additional
One Hundred Fifty-Five & No/100ths (\$155.00) Dollars were paid

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