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CONNIE S. TANKERSLEY
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BOOK 17 PAGE 995

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

Dorothy V. Rozell,)
Plaintiff,) 77-C.P. 23-209
-vs-) COMPLAINT
Richard Aubrey Rozell, Jr.,)
Defendant.)

The Plaintiff, complaining of the Defendant, will respectfully show unto the Court that:

I.

The Defendant is presently residing outside of the State of South Carolina; that the property hereinafter described is located in the County of Greenville, State of South Carolina.

II.

That heretofore on or about November 21, 1975, an Order was issued by the Honorable Frank Epps, Resident Judge of the Thirteenth Judicial Circuit granting the Plaintiff a divorce absolute; that among other things, the said Order found that the Defendant was in arrears in alimony and child support in the amount of Three Thousand Fifty Seven and 79/100 Dollars (\$3,057.79), and further Ordered that the house and lot hereinafter described be sold with the proceeds being applied first to a mortgage held by John Hancock, then secondly to a judgment held by Fidelity Federal Savings and Loan Association, and the remaining net proceeds to be divided between the said Dorothy V. Rozell and Richard Aubrey Rozell, Jr., with the Three Thousand Fifty Seven and 79/100 Dollars (\$3,057.79) being deducted from Richard Aubrey Rozell, Jr.'s proceeds.

III.

That the subject property of which the Defendant is the owner is described as follows:

ALL of that lot of land in the City of Greenville, County of Greenville, State of South Carolina and being known as Lot No. 3, Block E, Section 2 of the sub-division of East Highlands Estate made by Dalton & Neves, dated May, 1940 and recorded in the R.M.C. Office for Greenville County in Plat Book K at Page 44 and having, according to said plat, the following metes and bounds, to-wit:

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