

placed in the hands of an attorney for collection, the purchasers would be responsible for reasonable attorney fees not to exceed fifteen (15%) per cent of the unpaid balance; that the Plaintiff has been forced to turn the matter over to W. Dennis Chamberlain, Attorney, for collection and Plaintiff believes that a reasonable attorney fee is fifteen (15%) per cent of the unpaid balance or One Thousand Fourteen and 53/100ths (\$1,014.53).

V. That Plaintiff has made a demand upon the Defendant for full payment, however, the Defendant has failed and refuses to pay as evidenced by the Verified Itemized Statement of Account attached hereto and labeled as Exhibit "B", said statement is hereby incorporated into the Complaint by reference.

VI. That the Defendant owns certain real property located at 5 Newington Green, Taylors, Greenville County, South Carolina; that said property is encumbered by a mortgage in favor of South Carolina Federal Savings and Loan Association in the original amount of Forty-Two Thousand Eight Hundred and no/100ths (\$42,800.00) Dollars, and was recorded in the Greenville County R.M.C. Office in Mortgage Book 1439, at Page 579, on July 28, 1978; that said mortgage is a prior lien on said property, and for that reason the mortgage holder is not a party to this action for the reason its lien will not be affected thereby; that the Plaintiff is informed and believes that it is entitled under the Statute Laws of the State of South Carolina, the Plaintiff is entitled to have the Defendant's real property, as described, attached as security for the satisfaction of any money judgment and to the extent of the money judgment demanded which Plaintiff may obtain against the Defendant in this case, with the right to sell the property according to law, subject to the lien of the above described mortgage.

WHEREFORE, the Plaintiff requests judgment against the Defendant in the sum of Seven Thousand Seven Hundred Seventy-Eight and 11/100ths (\$7,778.11) Dollars, plus interest to the extent allowed by law and to be determined by the Court, plus the costs of this action, and for a Writ of Attachment authorizing the Sheriff of Greenville County to attach and seize