

and billed at a later date.

In connection with the liquidation of Marshall & Williams Southern Corporation into Marshall & Williams Corporation, we assumed the real estate had a value of \$150,000, less \$46,000 for the existing mortgage or \$104,000. We allocated 32% of the \$1,500,000 purchase price (using the net worths of Southern and M & W on the basis of the 6/30/64 financials and disregarding the small amount paid for the stock of Marshall & Williams Equipment Company) to the assets of Marshall & Williams Southern Corporation for a figure of \$480,000. We assumed that the liabilities of Southern assumed by Northern were \$226,000.

$$\begin{array}{r} (\$104,000 - \$50,000) \\ \$480,000 \quad \$226,000 \end{array}$$
 Hence the stamps were based on \$50,000 which produced a federal documentary stamp tax of \$55 and a South Carolina documentary stamp tax of \$100.

In connection with the liquidation of Northern into Bevis we used the same assumptions set forth in the preceding paragraphs (\$104,000 for the value of the South Carolina real estate and \$750,000 for the total liabilities assumed) and based the tax on \$52,000, which gives a federal documentary stamp tax of \$57.20 and a South Carolina documentary stamp tax of \$104,000.

For title insurance we used \$200,000 for the Rhode Island real estate (to reduce the cost of the policy) and \$150,000 for the South Carolina real estate.