

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

IN THE COUNTY COURT

Paul W. Peeples,)
Plaintiff,)

vs.)

John L. Kemp and)
Elliot T. Wooten,)
Defendants.)

n-j
COMPLAINT

81-CP-23-1020

FILED CLERK OF COURT
GREENVILLE, S.C.
MAR 31 2 48 PM '81

RESID

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

I

That, upon information and belief, all the parties of this action are residents of said State and County and that this action seeks injunctive relief concerning a certain driveway easement crossing real estate located in said State and County.

II.

That heretofore, by deed of J. C. Henson, dated March 21, 1968 and recorded in Deed Book 840 at Page 147, the Plaintiff acquired title to a tract of land containing approximately 53 acres, having partial frontage on the westerly side of S. C. Highway Number 14.

III.

That the Defendants, John L. Kemp and Elliot T. Wooten are the record owners of separate parcels of land which adjoin the property of the Plaintiff on its southeasterly side.

IV.

That the access to an old dwelling house located on the southeasterly side of Plaintiff's property is an old

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