

IX.

That the aforesaid obstruction erected by Defendants and their other actions relating to Plaintiff's use of said driveway constitute a continuing trespass or interference with Plaintiff's right to use such driveway easement and Plaintiff is therefore without an adequate remedy at law and must seek injunctive relief as his only adequate remedy.

WHEREFORE, Plaintiff prays judgment of the Court as follows:

1. That Plaintiff be declared to be the owner of a prescriptive easement crossing the property of the Defendants as shown on the plat attached hereto as Exhibit A;
2. That Defendants be required to immediately remove from the property any obstructions or impediments with the free use of such driveway;
3. That the Defendants be permanently enjoined from any actions or activities which tend to interfere with the free and open use and enjoyment by Plaintiff of the aforesaid driveway easement;
4. That Defendants be required to pay all the costs and expenses of this action, including a reasonable attorney's fee; and
5. For such other and further as to the Court may seem just and proper.

March 6th, 1981
Greer, South Carolina

EDWARDS, DUGGAN AND REESE, P. A.
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ATTORNEYS FOR PLAINTIFF

WAR #3

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