

*Ephelbet B*

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STATE OF SOUTH CAROLINA )  
COUNTY OF GREENVILLE )  
South Carolina National Bank, )  
Plaintiff, )  
vs. )  
United Merchants and )  
Manufacturers, Inc., )  
Defendant. )

IN THE COURT OF COMMON PLEAS

C O M P L A I N T

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

I.

That the Plaintiff is a national banking institution organized under the laws of the United States, with offices and agents in the County of Greenville, State of South Carolina; that the Defendant is a corporation organized and existing under the laws of one of the states of the United States with offices and agents in the County of Greenville, State of South Carolina.

II.

That on or about February 25, 1977, the Defendant did, for value received, execute and deliver to the Plaintiff its certain note in writing, said note being a promise by the Defendant to pay to the Defendant, and said note being endorsed in blank by the Defendant, the sum of Seven Hundred Fifty Thousand and no/100 Dollars (\$750,000.00) at the South Carolina National Bank, Greenville, South Carolina, on or before June 24, 1977.

III.

That the Plaintiff is now the owner and holder of said note.

IV.

That the Defendant has defaulted on the payment of said note, that the Plaintiff has demanded payment and the Plaintiff has declared the note to be due and payable in the full amount of Seven Hundred Fifty Thousand and no/100 Dollars (\$750,000.00), plus interest at the rate of six per cent (6%) per annum on the full amount from June 24, 1977;

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