

## IV.

Plaintiff does not have sufficient funds with which to pay an attorney for bringing and maintaining this action, and she is informed and believes that a reasonable fee for her attorney for bringing this action is \$750.00 and that the defendant should be required to pay such.

## V.

Plaintiff further respectfully shows to the Court that the defendant, Demetrie J. Liatos, is the owner of an undivided one-third interest in the following described real estate in Greenville, South Carolina, by virtue of deed from John A. Messer, Jr., Winifred N. Messer, John A. Messer, III, Douglas G. Messer and Alan M. Messer dated June 15, 1973 and recorded in the Office of the R.M.C. for Greenville County in Deed Book 977, at page 479:

ALL that piece, parcel or tract of land lying and being in the County of Greenville, State of South Carolina, on the eastern side of Frontage Road of U.S. Highway 276 near the Town of Mauldin, South Carolina, said property being shown on the Greenville County Tax Maps on Sheet 292, Block 1, Tract 13, and being further shown on a plat entitled "Baldwin Site" recorded in the R.M.C. Office for Greenville County in Plat Book "41" at Page 31.

The owners of the other two-thirds interest in such property are Frank Guarino and Michael Malches.

## VI.

Plaintiff is informed and believes that she is entitled to an attachment against the property of the said Demetrie J. Liatos for the debt which he owes to her for alimony and child support.

FOR A SECOND COUNT

## I.

The plaintiff, without expressly setting forth the same herein, incorporates the allegations of the First Count herein.

## II.

That in the divorce decree issued to the plaintiff herein by the Family Court of Greenville County, South Carolina, on January 16, 1975, the monetary provisions of which were based upon an Agreement signed by the parties on December 13, 1974, the defendant was obligated to pay

LEATHERWOOD,  
WALKER, TODD  
& MANN

217 East Coffee St.  
Greenville, S. C.  
29602

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