

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF GREENVILLE )  
 )  
 First-Citizens Bank & Trust )  
 Company, a corporation, )  
 )  
 Plaintiff, )  
 )  
 -vs- )  
 )  
 Linda Huff Burks, )  
 )  
 Defendant. )

IN THE COURT OF COMMON PLEAS

COMPLAINT

FILED CLERK OF COURT  
 GREENVILLE, CO. S.C.  
 CAROLINE H. HATTIS  
 SEP 12 3 42 PM '80

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The plaintiff, complaining of the above named defendant, would respectfully show unto the Court:

I

The plaintiff is a banking corporation organized and existing under the laws of the State of South Carolina with one of its places of business in Greenville County, South Carolina; that upon information and belief, the defendant, Linda Huff Burks, is a resident of some state other than the State of South Carolina and owns property in Greenville County, South Carolina.

II

That on January 11, 1980, the defendant, Linda Huff Burks, for value, executed and delivered unto the plaintiff her certain promissory note in writing in the principal amount of One Thousand Three Hundred Forty and 00/100 (\$1,340.00) Dollars, the terms of which provide in part for the payment and satisfaction of said indebtedness in One Hundred Eighty (180) days, on or before July 9, 1980.

III

By the terms of the promissory note, if the defendant should fail to fully pay and satisfy the indebtedness evidenced thereby and in accordance with the terms thereof, the holder may, at its option, declare the entire indebtedness immediately due and payable without demand or notice; that in the event the note should be placed in the hands of an attorney for collection, the defendant would be additionally liable for any costs and expenses incurred which are incident to said collection, including a reasonable

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