

STATE OF SOUTH CAROLINA)
 COUNTY OF GREENVILLE) IN THE COURT OF COMMON PLEAS

BUILDER MART OF GREENVILLE,)
 INC. FORMERLY ROSCO-CITIZENS)
 BUILDER MART, INC.,)
 Plaintiff,)
 vs.)
 PBI INDUSTRIES, INC., ALSO)
 KNOWN AS PALMETTO BUILDERS)
 OF GREENVILLE, INC., AND)
 LAURA S. BRANCH, JERRY B.)
 BRANCH AND RUDOLPH C. PEACOCK,)
 Defendants.)

AFFIDAVIT
 OF
 GROUNDS
 FOR
 ATTACHMENT

PERSONALLY APPEARED BEFORE ME THOMAS V. MELTON, JR.,
 who, after being duly sworn, deposes and says:

1. (a) That PBI Industries, Inc., also known as
 Palmetto Builders of Greenville, Inc., is justly and truly
 indebted to the Plaintiff in the amount of \$26,489.00 plus any
 further service charges which may accrue prior to judgment.

(b) That Laura S. Branch and Jerry B. Branch are
 officers of PBI Industries and are guarantors of the debt owed by
 PBI Industries, Inc.

2. He is Credit Manager of Builder Mart of Greenville,
 Inc. formerly known as Rosco-Citizens Builder Mart, Inc.; as
 Credit Manager he does establish the credit policies of the
 Plaintiff.

3. The building materials purchased from the Plaintiff
 were used in the construction of various houses.

4. In order to make payment of the cost of construction

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GREENVILLE