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The total unpaid balance due under the agreement is .... \$2,200.00 as shown on the Statement of Account, copy of which is attached and incorporated by reference; and the Respondents have refused the petitioner request for payment and the refusal is continuing.

The supplying of the materials and the performance of the labor as required by the agreement has been fully performed by the Petitioner, and that the last day on which the materials were supplied and the labor performed was on or about January 19, 1987.

The Deponent further states that he is entitled to a Materialman's Lien on the property of Gary W. and K. Phyllis Bible located at 4 Montague Circle near Travelers Rest, S. C.; plus reasonable attorney's fees.

Roger Jones, orner of Roger Jones Siding Co.