

2. That the MTPC was duly incorporated as an eleemosynary corporation by the State of South Carolina on July 20, 1933, and continues in existence to date.

3. That the property at issue herein was purchased on November 11, 1952, by the then trustees of MTPC, pursuant to its by-laws and Articles of Incorporation, for the exclusive use and benefit of the members of said church.

4. That the individual plaintiffs are the proper and legal authorities of MTPC and that the plaintiff church, by and through its present General Board of Trustees, is the proper and legal owner in fee simple absolute of the subject property.

5. That Leroy Williams was duly elected as Chairman of the Board of Trustees of the plaintiff church in August, 1978, was duly re-elected to said position in August, 1982, continues in such capacity at present, and was the Chairman of the Board of Trustees on January 29, 1980, and February 23, 1982, the dates of the two deeds in question.

6. That the defendant, Naomi Strong, was not Chairman of the Board of Trustees of MTPC at any

*W.S. Williams*