

Ruth H. Howard, did execute and deliver to the Defendants, Betty G. Cooper and Larry Lee Cooper, Jr., a deed covering the following described property:

"ALL that certain tract of land, lying and being in the County of Greenville, State of South Carolina, and containing one-fourth (1/4) acre, more or less, and being shown on a plat made by W. N. Willis, dated September 21, 1970. Copy of said plat is attached hereto, marked "Exhibit B" and made a part hereof."

## VII

That Plaintiff is informed and believes that the Defendants, Betty G. Cooper and/or Larry Lee Cooper, Jr., did not have the aforementioned deed into them recorded in the R.M.C. Office for Greenville County, but that they claim, or may claim, an interest in said real estate.

## VIII

Plaintiff alleges that he is still the owner and holder of the Judgment hereinabove mentioned and the note from the Defendants, Larry Lee Cooper and Betty G. Cooper, respectively, and that as such, he claims a lien upon said real estate and further, he is entitled to have same sold and the proceeds applied to his Judgment against Larry Lee Cooper, Jr., and to any Judgment he obtains hereby against Betty G. Cooper.

## IX

That the Defendants, James A. Howard and Ruth H. Howard, are named parties hereto by reason of the fact that they are the record owners of the property herein involved.

WHEREFORE, Plaintiff prays:

1. That he have Judgment against the Defendant, Betty G. Cooper, in the amount of Thirteen Thousand (\$13,000.00) Dollars, plus interest, attorney fees and cost.
2. That the real estate hereinabove described be sold with the proceeds of sale being applied as follows: (a) To the cost of this action, (b) To the Judgment owned by the Plaintiff

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