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existing driveway running from S. C. Highway 14 approximately 450 feet along the joint line of the property of the Defendants as is more particularly shown on the plat attached hereto entitled, "Map of Mathias Brisack Estate", prepared by H. S. Brockman, Surveyor and dated July 25, 1934. (See Exhibit A)

V.

That Plaintiff and his predecessors in title have been in continuous, hostile, open, adverse, notorious, and exclusive possession of such driveway for purposes of ingress and egress to and from such dwelling house and tract of land for a period in excess of twenty (20) years, to the extent that it may now be legally presumed that an easement was previously granted to the plaintiff and/or his predecessors in title for purposes of ingress and egress over the subject driveway.

VI.

That in or about August, 1980, one or both of the Defendants, or someone acting in their behalf or subject to their control, caused the entrance way to Plaintiff's driveway to be obstructed by placing felled trees across such entrance way thereby preventing free use of such driveway by the Plaintiff.

VII.

That, more recently, Plaintiff contracted with one Zoro Emory for the harvesting of certain pulpwood located on Plaintiff's tract and one or both of the Defendants refused to allow Mr. Emory to use the subject driveway for purposes of access to and from Plaintiff's property.

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VIII.

That, Plaintiff has demanded of the Defendants that the obstructions to his driveway be removed, but such demands have been neglected or refused.

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