

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
9th JUDICIAL CIRCUIT
CASE NO.: 2019-CP-10-4053

BLIND ACRE, INC.,
Plaintiff,

v.

DAMAGES SYNOPSIS

STASH STORAGE HOLDINGS,
INC.,
Defendant.

Contract Damages: 36 months (August 1, 2018 – August 1, 2021): \$937,589.15

Invoices through June 15, 2019: (\$237,589.15 - \$50,000.00): \$187,589.15

• Invoice #1.	08-01-2018 due 08-01-2018:	\$25,000.00	Paid: 08-31-2018
• Invoice #2.	08-24-2018 due 09-01-2018:	\$25,000.00	Paid: 01-18-2019
• Invoice #3.	09-01-2018 due 10-01-2018:	\$25,000.00	Outstanding
• Invoice #4.	09-12-2018 due 09-12-2018:	\$250.00	Outstanding
• Invoice #5.	09-12-2018 due 09-12-2018:	\$800.00	Outstanding
• Invoice #6.	09-15-2018 due 09-15-2018:	\$522.00	Outstanding
• Invoice #7.	10-01-2018 due 11-01-2018:	\$25,000.00	Outstanding
• Invoice #8.	10-15-2018 due 10-15-2018:	\$1,055.42	Outstanding
• Invoice #9.	10-01-2018 due 11-01-2018:	\$25,000.00	Outstanding
• Invoice #10.	10-15-2018 due 11-15-2018:	\$1,200.00	Outstanding
• Invoice #11.	11-02-2018 due 11-30-2018:	\$25,000.00	Outstanding
• Invoice #12.	11-02-2018 due 11-02-2018:	\$1,068.30	Outstanding
• Invoice #13.	11-15-2018 due 11-15-2018:	\$1,597.89	Outstanding
• Invoice #14.	11-15-2018 due 11-15-2018:	\$3,940.51	Outstanding
• Invoice #15.	11-16-2018 due 11-16-2018:	\$168.00	Outstanding
• Invoice #16.	12-01-2018 due 01-01-2019:	\$25,000.00	Outstanding
• Invoice #17.	12-03-2018 due 12-31-2018:	\$1,900.00	Outstanding
• Invoice #18.	12-13-2018 due 12-13-2018:	\$531.50	Outstanding
• Invoice #19.	12-14-2018 due 12-14-2018:	\$4,000.00	Outstanding
• Invoice #20.	12-15-2018 due 12-15-2018:	\$2,340.77	Outstanding
• Invoice #21.	01-01-2019 due 02-01-2019:	\$25,000.00	Outstanding
• Invoice #22.	01-15-2019 due 01-15-2019:	\$2,887.59	Outstanding
• Invoice #23.	02-15-2019 due 02-15-2019:	\$2,945.24	Outstanding
• Invoice #24.	03-15-2019 due 03-15-2019:	\$3,004.15	Outstanding
• Invoice #25.	04-15-2019 due 04-15-2019:	\$3,064.23	Outstanding
• Invoice #26.	05-15-2019 due 05-15-2019:	\$3,125.52	Outstanding

• Invoice #27. 06-15-2019 due 06-15-2019:	\$3,188.03	Outstanding
Total Remaining from Invoices:		\$187,589.15
Total Remaining 3-1-19 through 8-1-21(30 mons x \$25,000.00):		\$750,000.00
Total Contractual Damages:		\$937,589.15
Suggested Punitive Damage Award:		\$1,000,000.00
Treble Damages (3 x Total Contractual Damages):		\$2,812,767.45
Suggested Total Damages Award:		\$3,812,767.45

RIESEN DURANT LLC

BY: _____


 G. Rutledge DuRant (SC Bar #: 73944)
 613 Long Point Road, Suite 100
 Mount Pleasant, South Carolina 29464
 Phone: 843.800.0809 Fax: 843.767.3282
 Email: rutledge@riesendurant.com
Attorneys for the Plaintiff

Mount Pleasant, South Carolina
 June 2, 2021

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BILL TO

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INVOICE 15576

DATE 08/01/2018

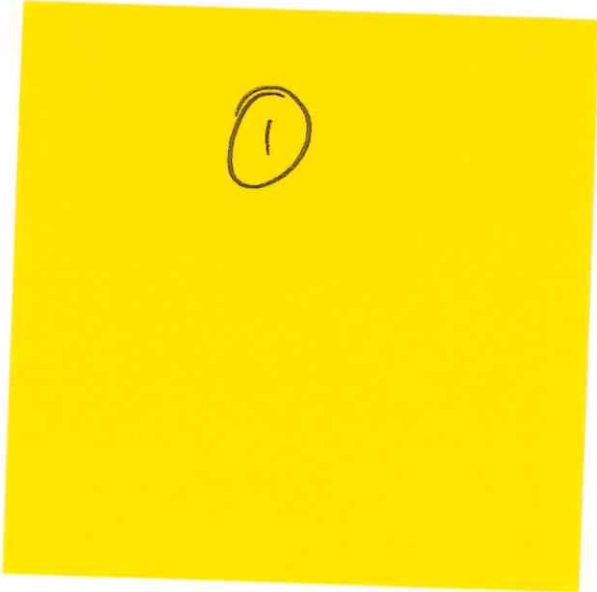
DUE DATE 08/01/2018

DATE	ACTIVITY	QTY	RATE	AMOUNT
08/01/2018	Monthly Managed Service Monthly Managed Agency Services	500	50.00	25,000.00

PAID

TOTAL DUE

\$0.00



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INVOICE 15580

DATE 08/24/2018 **TERMS** Due 1st of Month

DUE DATE 09/01/2018

DATE	ACCOUNT SUMMARY	AMOUNT
08/01/2018	Balance Forward	\$25,000.00
	Payments and credits between 08/01/2018 and 08/24/2018	0.00
	New charges (details below)	25,000.00
	Total Amount Due	\$50,000.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
09/01/2018	Monthly Managed Service September Monthly Managed Agency Services	500	50.00	25,000.00

TOTAL OF NEW CHARGES 25,000.00

TOTAL DUE **\$50,000.00**



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INVOICE 15596

DATE 09/01/2018 **TERMS** Due 1st of Month

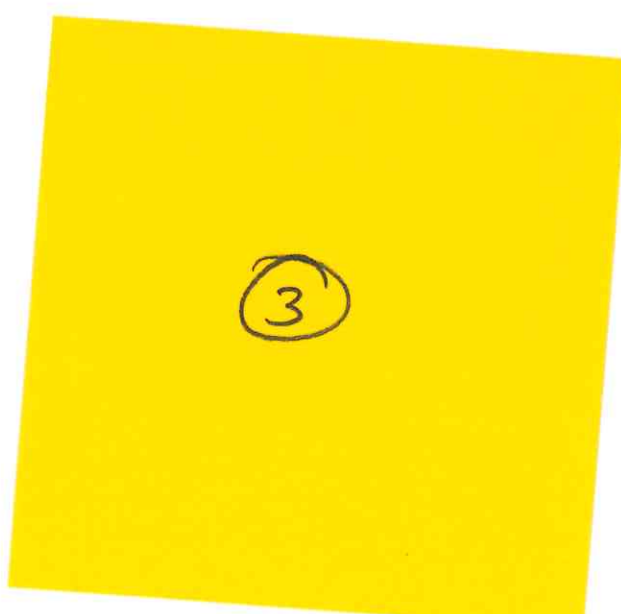
DUE DATE 10/01/2018

DATE	ACCOUNT SUMMARY	AMOUNT
08/24/2018	Balance Forward	\$50,000.00
	Payments and credits between 08/24/2018 and 09/01/2018	-25,000.00
	New charges (details below)	25,000.00
	Total Amount Due	\$50,000.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
10/01/2018	Monthly Managed Service October Monthly Managed Agency Services	500	50.00	25,000.00

TOTAL OF NEW CHARGES 25,000.00

TOTAL DUE \$50,000.00



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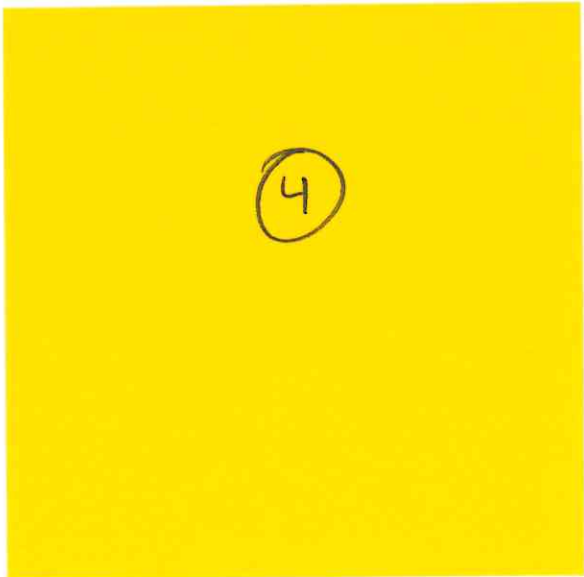
INVOICE 15601

DATE 09/12/2018 **TERMS** Due on receipt

DUE DATE 09/12/2018

DATE	ACCOUNT SUMMARY	AMOUNT
09/01/2018	Balance Forward	\$50,000.00
	Payments and credits between 09/01/2018 and 09/12/2018	0.00
	New charges (details below)	250.00
	Total Amount Due	\$50,250.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
09/12/2018	Digital Marketing September \$100 FB/IG + \$100 Twitter (BAM Card) \$50 (Social) Management Fee	1	250.00	250.00



TOTAL OF NEW CHARGES 250.00

TOTAL DUE **\$50,250.00**

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INVOICE 15598

DATE 09/12/2018 TERMS Due on receipt

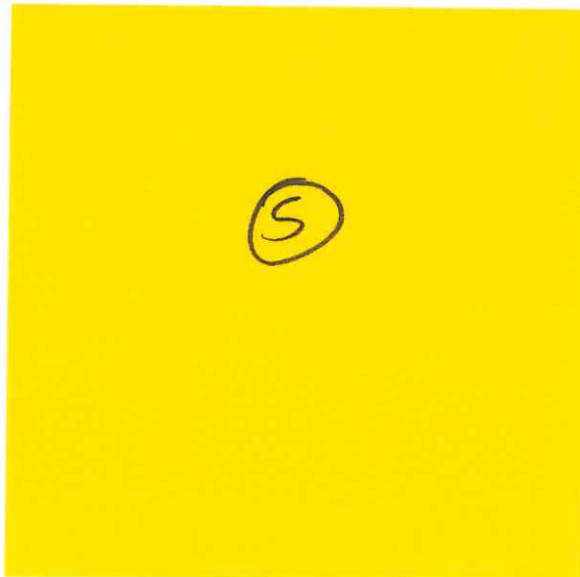
DUE DATE 09/12/2018

DATE	ACCOUNT SUMMARY	AMOUNT
09/01/2018	Balance Forward	\$50,000.00
	Payments and credits between 09/01/2018 and 09/12/2018	0.00
	New charges (details below)	800.00
	Total Amount Due	\$50,800.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
09/12/2018	Domain Name Regist & Renewal Stash.storage Domain	1	800.00	800.00

TOTAL OF NEW CHARGES 800.00

TOTAL DUE \$50,800.00



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INVOICE 15648

DATE 09/15/2018 **TERMS** Due on receipt

DUE DATE 09/15/2018

DATE	ACCOUNT SUMMARY	AMOUNT
09/12/2018	Balance Forward	\$51,050.00
	Payments and credits between 09/12/2018 and 09/15/2018	0.00
	New charges (details below)	522.00
	Total Amount Due	\$51,572.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
09/15/2018	Digital Marketing	1	522.00	522.00
	Late Fee Interest on outstanding balance			

TOTAL OF NEW CHARGES 522.00

TOTAL DUE \$51,572.00



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INVOICE 15618

DATE 10/01/2018 **TERMS** Due 1st of Month

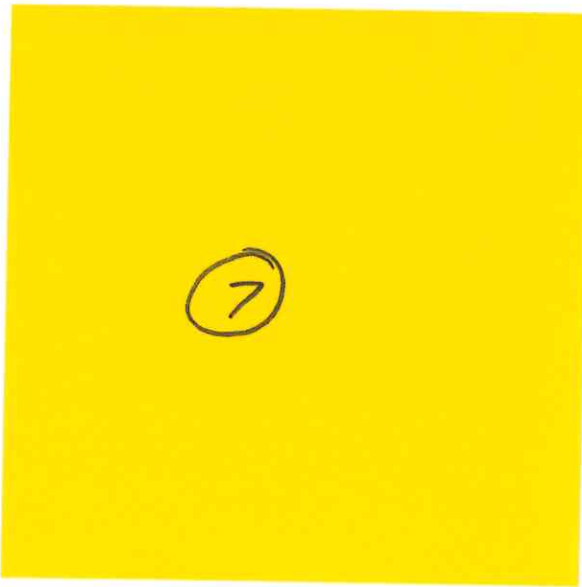
DUE DATE 11/01/2018

DATE	ACCOUNT SUMMARY	AMOUNT
09/15/2018	Balance Forward	\$51,572.00
	Payments and credits between 09/15/2018 and 10/01/2018	0.00
	New charges (details below)	25,000.00
	Total Amount Due	\$76,572.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
10/01/2018	Monthly Managed Service November Monthly Managed Agency Services	500	50.00	25,000.00

TOTAL OF NEW CHARGES 25,000.00

TOTAL DUE **\$76,572.00**



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INVOICE 15649

DATE 10/15/2018 TERMS Due on receipt

DUE DATE 10/15/2018

DATE	ACCOUNT SUMMARY	AMOUNT
10/01/2018	Balance Forward	\$76,572.00
	Payments and credits between 10/01/2018 and 10/15/2018	0.00
	New charges (details below)	1,055.42
	Total Amount Due	\$77,627.42

DATE	ACTIVITY	QTY	RATE	AMOUNT
10/15/2018	Digital Marketing	1	1,055.42	1,055.42
	October Late Fee Interest			

TOTAL OF NEW CHARGES 1,055.42

TOTAL DUE \$77,627.42



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INVOICE # 15618

DATE 10/01/2018

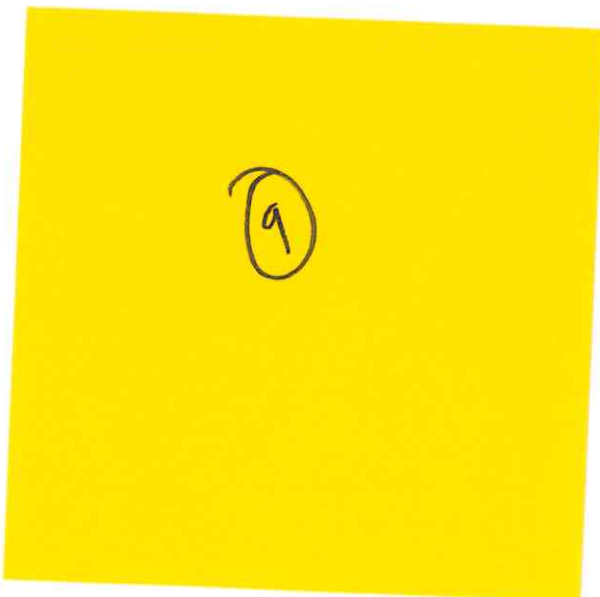
DUE DATE 11/01/2018

TERMS Due 1st of Month

DATE	ACTIVITY	QTY	RATE	AMOUNT
10/01/2018	Monthly Managed Service November Monthly Managed Agency Services	500	50.00	25,000.00

BALANCE DUE

\$25,000.00



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INVOICE 15620

DATE 10/15/2018 TERMS Due on receipt

DUE DATE 10/15/2018

DATE	ACCOUNT SUMMARY	AMOUNT
10/01/2018	Balance Forward	\$76,572.00
	Payments and credits between 10/01/2018 and 10/15/2018	0.00
	New charges (details below)	1,200.00
	Total Amount Due	\$77,772.00

DATE	ACTIVITY	QTY	RATE	AMOUNT
10/15/2018	Services Rivers Announcement - National Press Release	1	1,200.00	1,200.00

TOTAL OF NEW CHARGES 1,200.00

TOTAL DUE \$77,772.00

⑩
label as due
11/15 on
synopsis

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INVOICE 15633

DATE 11/02/2018 TERMS Due 1st of Month

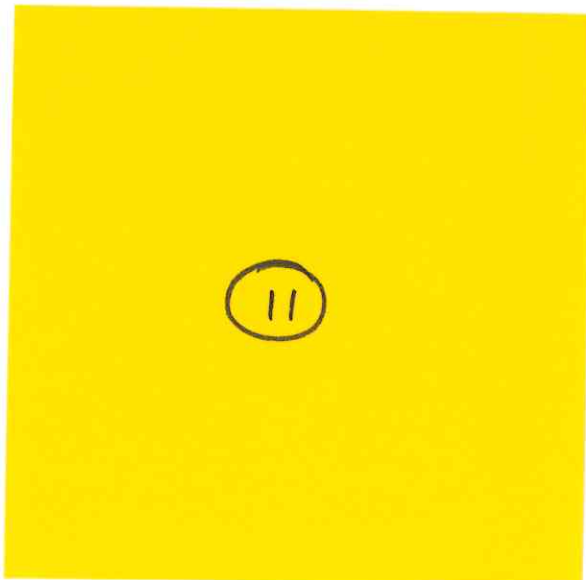
DUE DATE 11/30/2018

DATE	ACCOUNT SUMMARY	AMOUNT
10/15/2018	Balance Forward	\$78,827.42
	Payments and credits between 10/15/2018 and 11/02/2018	0.00
	New charges (details below)	25,000.00
	Total Amount Due	\$103,827.42

DATE	ACTIVITY	QTY	RATE	AMOUNT
12/01/2018	Monthly Managed Service December Monthly Managed Agency Services	500	50.00	25,000.00

TOTAL OF NEW CHARGES 25,000.00

TOTAL DUE **\$103,827.42**



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INVOICE 15632

DATE 11/02/2018 **TERMS** Due on receipt

DUE DATE 11/02/2018

DATE	ACCOUNT SUMMARY	AMOUNT
10/15/2018	Balance Forward	\$78,827.42
	Payments and credits between 10/15/2018 and 11/02/2018	0.00
	New charges (details below)	1,068.30
	Total Amount Due	\$79,895.72

DATE	ACTIVITY	QTY	RATE	AMOUNT
10/31/2018	Digital Marketing October \$568.44 FB/IG (BAM Card) \$1,430.99 Adwords Spend (STASH card) \$142.11 (Social) + \$357.75 (PPC) Management Fee = \$499.86	1	1,068.30	1,068.30

TOTAL OF NEW CHARGES 1,068.30

TOTAL DUE **\$79,895.72**



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INVOICE 15650

DATE 11/15/2018 TERMS Due on receipt

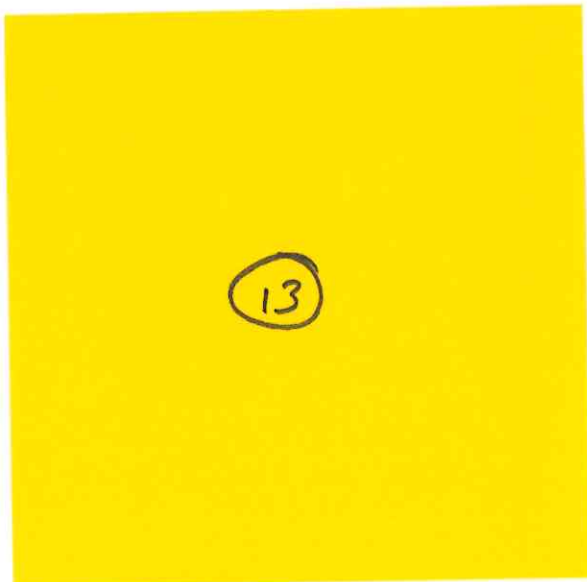
DUE DATE 11/15/2018

DATE	ACCOUNT SUMMARY	AMOUNT
11/02/2018	Balance Forward	\$104,895.72
	Payments and credits between 11/02/2018 and 11/15/2018	0.00
	New charges (details below)	1,597.89
	Total Amount Due	\$106,493.61

DATE	ACTIVITY	QTY	RATE	AMOUNT
11/15/2018	Digital Marketing	1	1,597.89	1,597.89
	November Late Fee Interest			

TOTAL OF NEW CHARGES 1,597.89

TOTAL DUE \$106,493.61



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INVOICE 15644

DATE 11/15/2018 TERMS Due on receipt

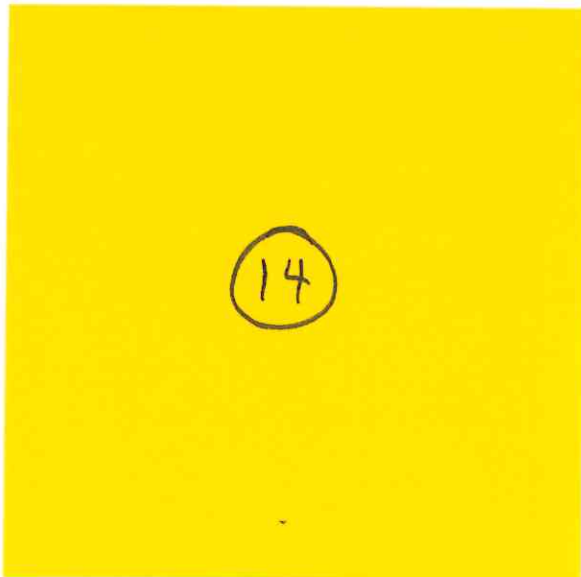
DUE DATE 11/15/2018

DATE	ACCOUNT SUMMARY	AMOUNT
11/02/2018	Balance Forward	\$104,895.72
	Payments and credits between 11/02/2018 and 11/15/2018	0.00
	New charges (details below)	3,940.51
	Total Amount Due	\$108,836.23

DATE	ACTIVITY	QTY	RATE	AMOUNT
11/15/2018	Digital Marketing November \$1,725.98 FB/IG (BAM Card) \$7,132.12 Adwords Spend (STASH card) \$431.50 (Social) + \$1,783.03 (PPC) Management Fee = \$2,214.53	1	3,940.51	3,940.51

TOTAL OF NEW CHARGES 3,940.51

TOTAL DUE **\$108,836.23**



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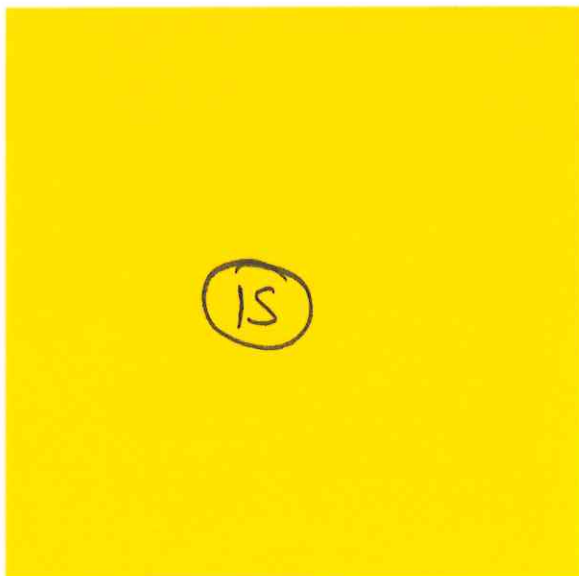
INVOICE 15646

DATE 11/16/2018 **TERMS** Due on receipt

DUE DATE 11/16/2018

DATE	ACCOUNT SUMMARY	AMOUNT
11/15/2018	Balance Forward	\$110,434.12
	Payments and credits between 11/15/2018 and 11/16/2018	0.00
	New charges (details below)	168.00
	Total Amount Due	\$110,602.12

DATE	ACTIVITY	QTY	RATE	AMOUNT
11/15/2018	Digital Marketing Printed Sign (24"x36") "Enter to Win" for Booth	1	168.00	168.00



TOTAL OF NEW CHARGES 168.00

TOTAL DUE **\$110,602.12**

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INVOICE 15661

DATE 12/01/2018 **TERMS** Due 1st of Month

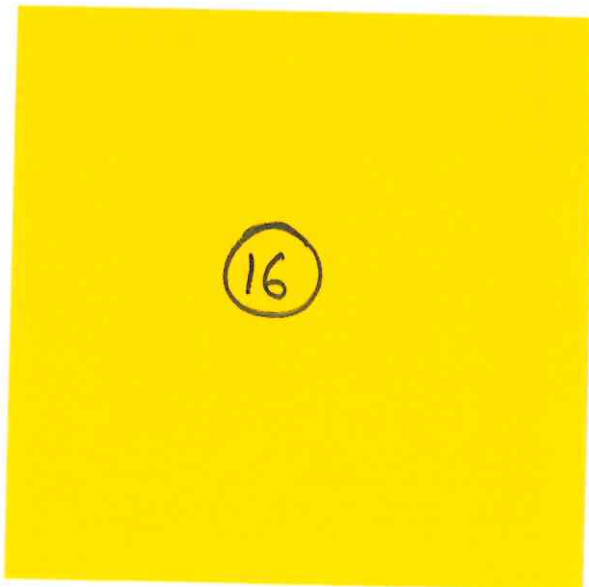
DUE DATE 01/01/2019

DATE	ACCOUNT SUMMARY	AMOUNT
11/16/2018	Balance Forward	\$110,602.12
	Payments and credits between 11/16/2018 and 12/01/2018	0.00
	New charges (details below)	25,000.00
	Total Amount Due	\$135,602.12

DATE	ACTIVITY	QTY	RATE	AMOUNT
01/01/2019	Monthly Managed Service January Monthly Managed Agency Services	500	50.00	25,000.00

TOTAL OF NEW
CHARGES 25,000.00

TOTAL DUE \$135,602.12



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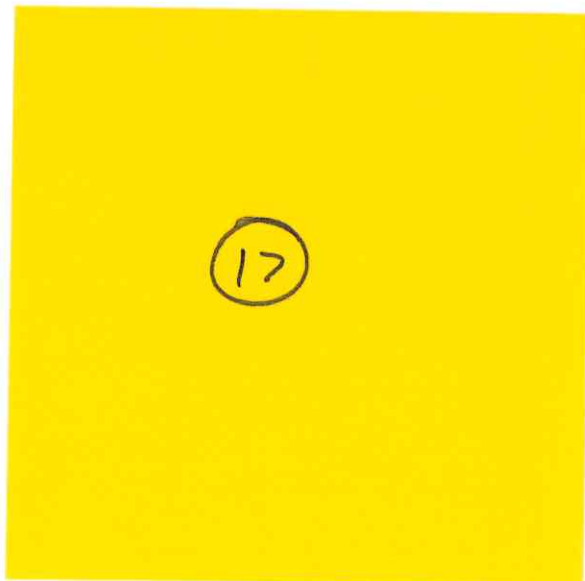
INVOICE 15665

DATE 12/03/2018 TERMS Due on receipt

DUE DATE 12/31/2018

DATE	ACCOUNT SUMMARY	AMOUNT
12/01/2018	Balance Forward	\$135,602.12
	Payments and credits between 12/01/2018 and 12/03/2018	0.00
	New charges (details below)	1,900.00
	Total Amount Due	\$137,502.12

DATE	ACTIVITY	QTY	RATE	AMOUNT
11/30/2018	Development November Storganize Development Enhancements	38	50.00	1,900.00T



SUBTOTAL	1,900.00
TAX (0%)	0.00
TOTAL	1,900.00
TOTAL OF NEW CHARGES	1,900.00
TOTAL DUE	\$137,502.12

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INVOICE 15671

DATE 12/13/2018 TERMS Due on receipt

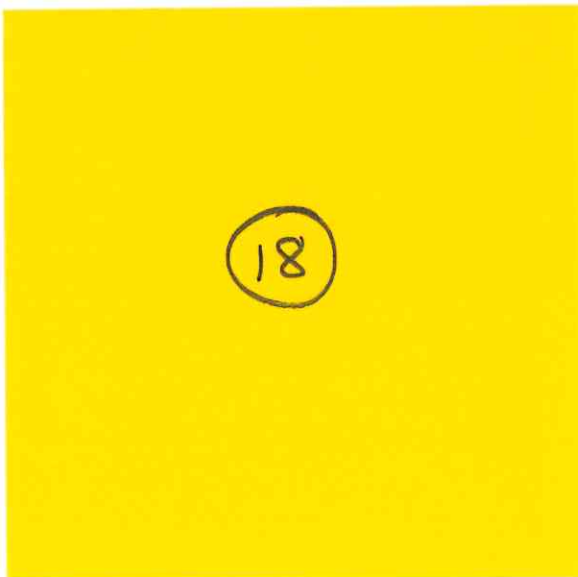
DUE DATE 12/13/2018

DATE	ACCOUNT SUMMARY	AMOUNT
12/03/2018	Balance Forward	\$137,502.12
	Payments and credits between 12/03/2018 and 12/13/2018	0.00
	New charges (details below)	531.50
	Total Amount Due	\$138,033.62

DATE	ACTIVITY	QTY	RATE	AMOUNT
12/13/2018	Digital Marketing December \$425.19 FB/IG (BAM Card) \$106.30 (Social) Management Fee	1	531.50	531.50

TOTAL OF NEW CHARGES 531.50

TOTAL DUE \$138,033.62



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INVOICE 15673

DATE 12/14/2018 **TERMS** Due on receipt

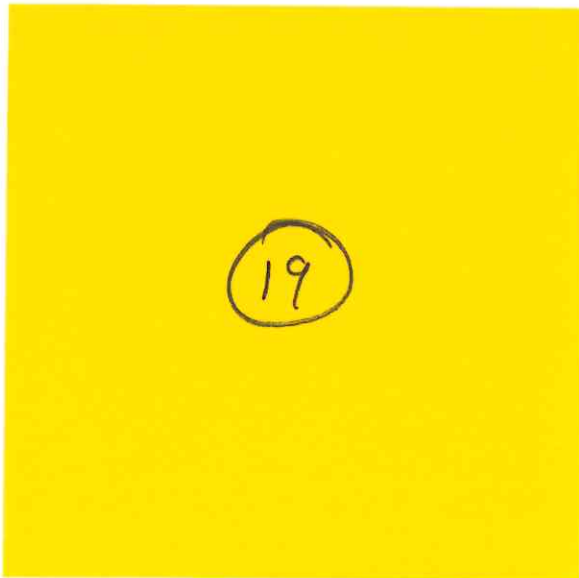
DUE DATE 12/14/2018

DATE	ACCOUNT SUMMARY	AMOUNT
12/13/2018	Balance Forward	\$138,033.62
	Payments and credits between 12/13/2018 and 12/14/2018	0.00
	New charges (details below)	4,000.00
	Total Amount Due	\$142,033.62

DATE	ACTIVITY	QTY	RATE	AMOUNT
12/14/2018	Development Storganize Development Enhancements	80	50.00	4,000.00

TOTAL OF NEW CHARGES 4,000.00

TOTAL DUE \$142,033.62



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INVOICE 15672

DATE 12/15/2018 **TERMS** Due on receipt

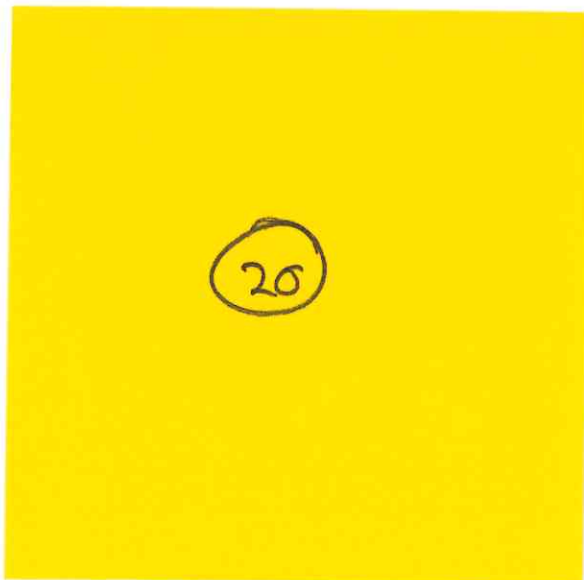
DUE DATE 12/15/2018

DATE	ACCOUNT SUMMARY	AMOUNT
12/14/2018	Balance Forward	\$142,033.62
	Payments and credits between 12/14/2018 and 12/15/2018	0.00
	New charges (details below)	2,340.77
	Total Amount Due	\$144,374.39

DATE	ACTIVITY	QTY	RATE	AMOUNT
12/15/2018	Digital Marketing	1	2,340.77	2,340.77
	December Late Fee Interest			

TOTAL OF NEW CHARGES 2,340.77

TOTAL DUE **\$144,374.39**



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INVOICE 15682

DATE 01/01/2019 TERMS Due 1st of Month

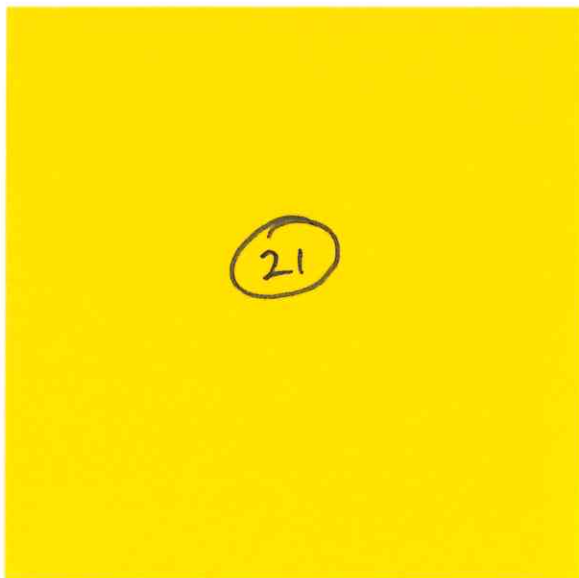
DUE DATE 02/01/2019

DATE	ACCOUNT SUMMARY	AMOUNT
12/15/2018	Balance Forward	\$144,374.39
	Payments and credits between 12/15/2018 and 01/01/2019	0.00
	New charges (details below)	25,000.00
	Total Amount Due	\$169,374.39

DATE	ACTIVITY	QTY	RATE	AMOUNT
02/01/2019	Monthly Managed Service February Monthly Managed Agency Services	500	50.00	25,000.00

TOTAL OF NEW CHARGES 25,000.00

TOTAL DUE \$169,374.39



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BILL TO

Tom Stephenson
Stash Storage
4750 Goer Drive
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North Charleston, SC 29406
United States

INVOICE 15691

DATE 01/15/2019 **TERMS** Due on receipt

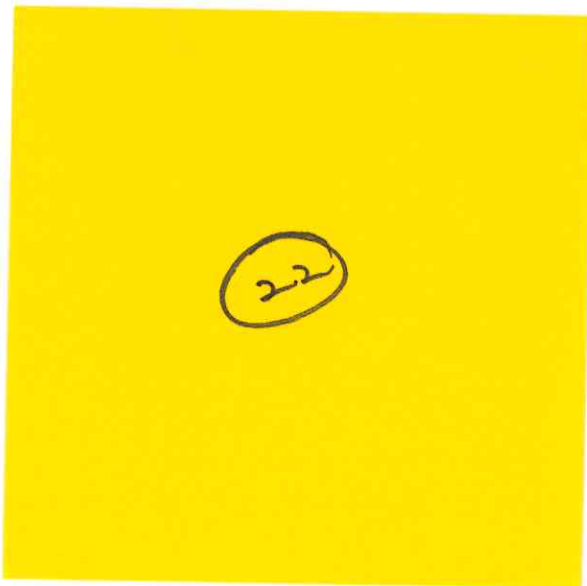
DUE DATE 01/15/2019

DATE	ACCOUNT SUMMARY	AMOUNT
01/01/2019	Balance Forward	\$169,374.39
	Payments and credits between 01/01/2019 and 01/15/2019	0.00
	New charges (details below)	2,887.59
	Total Amount Due	\$172,261.98

DATE	ACTIVITY	QTY	RATE	AMOUNT
01/15/2019	Digital Marketing	1	2,887.59	2,887.59
	January Late Fee Interest			

TOTAL OF NEW CHARGES 2,887.59

TOTAL DUE **\$172,261.98**



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INVOICE # 16003

DATE 02/15/2019

DUE DATE 02/15/2019

TERMS Due on receipt

DATE	ACTIVITY	QTY	RATE	AMOUNT
02/15/2019	Digital Marketing February Late Fee Interest	1	2,945.24	2,945.24

BALANCE DUE

\$2,945.24



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INVOICE # 16004

DATE 03/15/2019

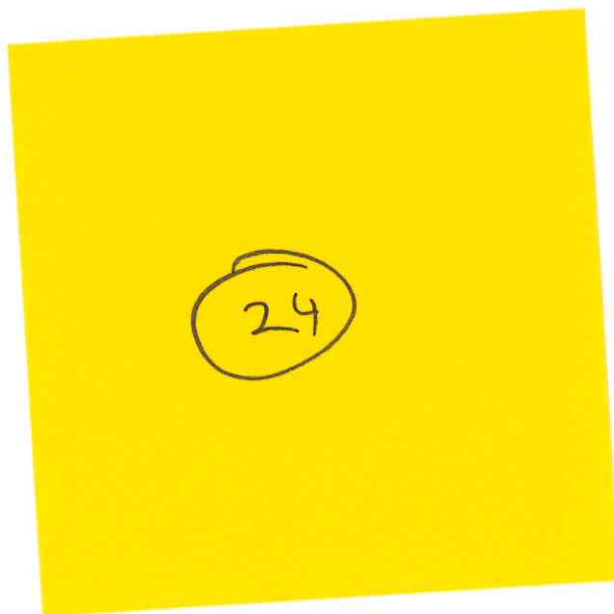
DUE DATE 03/15/2019

TERMS Due on receipt

DATE	ACTIVITY	QTY	RATE	AMOUNT
03/15/2019	Digital Marketing March Late Fee Interest	1	3,004.15	3,004.15

BALANCE DUE

\$3,004.15



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INVOICE # 16005

DATE 04/15/2019

DUE DATE 04/15/2019

TERMS Due on receipt

DATE	ACTIVITY	QTY	RATE	AMOUNT
04/15/2019	Digital Marketing April Late Fee Interest	1	3,064.23	3,064.23

BALANCE DUE

\$3,064.23

25

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INVOICE # 16006

DATE 05/15/2019

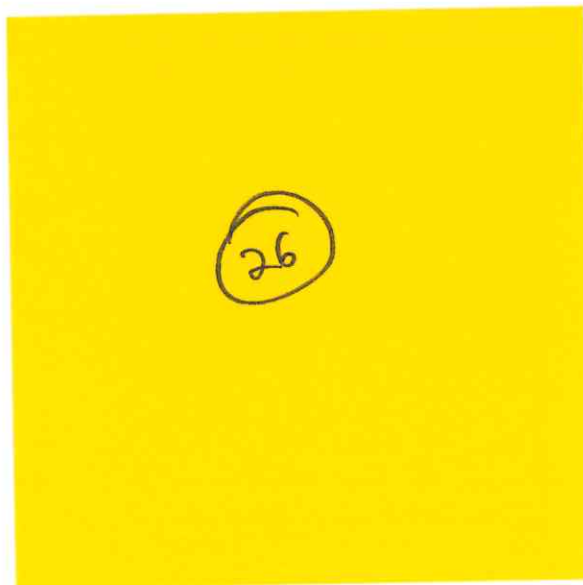
DUE DATE 05/15/2019

TERMS Due on receipt

DATE	ACTIVITY	QTY	RATE	AMOUNT
05/15/2019	Digital Marketing May Late Fee Interest	1	3,125.52	3,125.52

BALANCE DUE

\$3,125.52



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INVOICE # 16007

DATE 06/15/2019
DUE DATE 06/15/2019
TERMS Due on receipt

DATE	ACTIVITY	QTY	RATE	AMOUNT
06/15/2019	Digital Marketing June Late Fee Interest	1	3,125.52	3,125.52

BALANCE DUE

\$3,125.52

