

RECEIVED
Nov 28 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Walton J McLeod IV, Circuit Court

Judge

Lower Court Case No. 2020-CP-32-01461
Appellate Case No. 2022-000263

William Klotz,

Appellant,

v.

General Joe VanLier,

Respondent,

RECORD ON APPEAL

JAMES B. LYBRAND, JR.
Attorneys for Defendant, General Joe
Vanlier
Columbia, South Carolina
McDONALD, McKENZIE, RUBIN,s
MILLER AND LYBRAND, LLP
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Email: lybrand@mrrml.com

s/ WILLIAM L. KLOTZ, PRO SE
157 Ashepoo Dr
Aiken, South Carolina 29803
(704) 249-8665
Email



Scott Clark's TOYOTA / SCION

13000 E. Independence Blvd.
MATTHEWS, NC 28105
(704) 535-1972
www.scottclarkstoyota.com



CELL: 704-249-866

CUSTOMER NO. 132995	ADVISOR AL CONDREY	TAG NO. 2539	INVOICE DATE 01/24/14	INVOICE NO. TOCS895378
LYNDA BOGGS KLOTZ 115 CHESNEY GLEN DR MATTHEWS, NC 28105-5899 chemekadixon@yahoo.com	LABOR RATE	LICENSE NO.	MILEAGE 281,240	COLOR SUPER WHITE
	YEAR / MAKE / MODEL 02 / TOYOTA / PRIUS / 4DR SND HYBRID	DELIVERY DATE 01/25/03		STOCK NO.
	VEHICLE I.D. NO. J T 2 B K 1 8 U 8 2 0 0 6 2 5 3 3	SELLING DEALER NO.		DELIVERY MILES 387
RESIDENCE PHONE 704-847-7467	BUSINESS PHONE 704-249-8665	COMMENTS	R O DATE 01/18/14	REPRINT# 1

MO: 281240

LABOR-----

J# 4+00TOZ04 4-CYL OIL AND FILTER UNITS: TECH(S):229506 11.75

CHANGE OIL AND FILTER
CHANGE OIL AND FILTER
CHANGE OIL & FILTER MULTI-POINT INSPECTION
AND TOP OFF ALL FLUIDS

PARTS-----QTY---FP-NUMBER-----DESCRIPTION-----LIST PRICE-UNIT PRICE-		
1 90915-YZZF2 FILTER S/A, OIL	9.30	6.35
TOTAL - PARTS		6.35

G.O.G. & SUPPLIES-----

1.0 BULK OIL 4CYL	@ 10.160	/UNIT	10.16
TOTAL - GOG			10.16

JOB# 4 TOTALS-----

LABOR	11.75
PARTS	6.35
G.O.G.	10.16
JOB# 4 JOURNAL PREFIX TOCS JOB# 4 TOTAL	28.26

JOB# 5 CHARGES-----

TERMS: CASH UNLESS ARRANGEMENTS MADE

DISCLAIMER OF WARRANTIES

THE ONLY WARRANTIES, IF ANY APPLYING TO THESE PARTS, AND FOR SERVICES ARE THOSE OFFERED BY THE MANUFACTURER. THE SELLER HEREBY EXPRESSLY DISCLAIMS ALL WARRANTIES, EITHER EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND THE SELLER NEITHER ASSUMES NOR AUTHORIZES ANY OTHER PERSON TO ASSUME FOR IT ANY LIABILITY IN CONNECTION WITH THE SALE OF THESE PARTS AND/OR SERVICES. BUYER SHALL NOT BE ENTITLED TO RECOVER FROM SELLER ANY CONSEQUENTIAL DAMAGES, DAMAGES TO PROPERTY, DAMAGES FOR LOSS OF USE, LOSS OF TIME, LOSS OF PROFITS OR INCOME, OR ANY OTHER INCIDENTAL DAMAGES.

LABOR-----

J# 5+51TOZ07 MARKER LIGHTS UNITS: 0.20 TECH(S):229506 16.95

CUST STATES P/S FT MARKER LIGHTS INOP
REPLACED BULB

PARTS-----QTY---FP-NUMBER-----DESCRIPTION-----LIST PRICE-UNIT PRICE-		
1 00234-00194 BULB	1.41	1.41
TOTAL - PARTS		1.41

JOB# 5 TOTALS-----

LABOR	16.95
PARTS	1.41
JOB# 5 JOURNAL PREFIX TOCS JOB# 5 TOTAL	18.36

WARRANTY

CLAIM #1

CLAIM #2

LABOR-----

J# 6+09TOZ10 TOP ENG CLEAN UNITS: 0.80 TECH(S):229506 58.00

INDUCTION CLEANING SERVICE
INDUCTION CLEANING SERVICE
Fuel Induction Service All

PARTS-----QTY---FP-NUMBER-----DESCRIPTION-----LIST PRICE-UNIT PRICE-		
1 00053-00100 TOP ENG/INDUCT SV	27.05	23.82
TOTAL - PARTS		23.82

JOB# 6 TOTALS-----

LABOR	58.00
PARTS	23.82
JOB# 6 JOURNAL PREFIX TOCS JOB# 6 TOTAL	81.82

SERVICE DEPT. HOURS

Mon - Thur 7:00AM - 8:00PM
Friday 7:00AM - 6:00PM
Saturday 7:00AM - 4:00PM

The Reynolds and Reynolds Company ERANKTIVE CC681194.O (07/13)

W. KLOTZ 000166



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CELL: 704-249-8665

CUSTOMER NO. 132995	ADVISOR AL CONDREY	TAG NO. 2539	INVOICE DATE 01/24/14	INVOICE NO. TOCS895378
LYNDA BOGGS KLOTZ 115 CHESNEY GLEN DR MATTHEWS, NC 28105-5899 chemekadixon@yahoo.com	LABOR RATE	LICENSE NO.	MILEAGE 281,240	COLOR SUPER WHITE
	YEAR / MAKE / MODEL 02/TOYOTA/PRIUS/4DR SND HYBRID	DELIVERY DATE 01/25/03		DELIVERY MILES 387
	VEHICLE I.D. NO. J T 2 B K 1 8 U 8 2 0 0 6 2 5 3 3	SELLING DEALER NO.		PRODUCTION DATE
RESIDENCE PHONE 704-847-7467	BUSINESS PHONE 704-249-8665	COMMENTS	R.O. DATE 01/18/14	REPRINT# 1
				MO: 281240

JOB# 7 CHARGES

LABOR
J# 7+46T0Z04 ROTATE TIRES UNITS: 0.30 TECH(S):229506 16.95
 ROTATE TIRES
 ROTATE TIRES
 Rotate Tires 01/05

JOB# 7 TOTALS
 LABOR 16.95

JOB# 8 CHARGES
 LABOR 16.95

JOB# 8 JOURNAL PREFIX TOCS JOB# 8 TOTAL 16.95

JOB# 8 CHARGES

LABOR
J# 8+11T0Z ENGINE MINOR UNITS: 1.00 TECH(S):229506 94.95
 REPLACE SERP BELT
 COMPLETED

PARTS	QTY	FP-NUMBER	DESCRIPTION	LIST PRICE	UNIT PRICE	PRICE
	1	99363-91120	BELT, V-RIBBED	31.56	31.56	31.56
				TOTAL - PARTS		31.56

MISC	CODE	DESCRIPTION	CONTROL NO	PRICE	
	D3	SENIOR CITIZEN DISCOUNT - PARTS		-3.16	
	D4	SENIOR CITIZEN DISCOUNT - LABOR		-9.50	
				TOTAL - MISC	-12.66

JOB# 8 TOTALS
 LABOR 94.95
 PARTS 31.56
 MISC -12.66

JOB# 8 JOURNAL PREFIX TOCS JOB# 8 TOTAL 113.85

JOB# 9 CHARGES

LABOR
J# 9+40T0ZR6 PREMIUM BRAKE FLUID UNITS: 1.00 TECH(S):229506 97.41
 PERFORM BRAKE FLUSH
 COMPLETED

PARTS	QTY	FP-NUMBER	DESCRIPTION	LIST PRICE	UNIT PRICE	PRICE
	1	R4904	BRAKE FLUSH	31.73	31.73	31.73
				TOTAL - PARTS		31.73

JOB# 9 TOTALS
 LABOR 97.41
 PARTS 31.73

JOB# 9 JOURNAL PREFIX TOCS JOB# 9 TOTAL 129.14

JOB# 10 CHARGES

LABOR
J#10+20T0ZR2 VALUE PLUS COOLING UNITS: 1.00 TECH(S):229506 94.95
 VALUE PLUS COOLING SYSTEM EXCHANGE R3920 & 1 GAL COOLANT

TERMS: CASH UNLESS ARRANGMENTS MADE

DISCLAIMER OF WARRANTIES

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WARRANTY

CLAIM #1

CLAIM #2

SERVICE DEPT. HOURS

Mon - Thur 7:00AM - 8:00PM
 Friday 7:00AM - 6:00PM
 Saturday 7:00AM - 4:00PM

The Reynolds and Reynolds Company REPRINTIVE CC681194 Q (07/13)

W. KLOTZ 000167



Scott⁶²⁵ Clark's TOYOTA / SCION

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www.scottclarkstoyota.com



CELL: 704-249-8665

CUSTOMER NO. 132995	ADVISOR AL CONDREY	TAG NO. 163130	INVOICE DATE 01/24/14	INVOICE NO. TOCS895378
LYNDA BOGGS KLOTZ 115 CHESNEY GLEN DR MATTHEWS, NC 28105-5899 chemekadixon@yahoo.com	LABOR RATE	LICENSE NO.	MILEAGE 281,240	COLOR SUPER WHITE
	YEAR / MAKE / MODEL 02/TOYOTA/PRIUS/4DR SND HYBRID	DELIVERY DATE 01/25/03		DELIVERY MILES 387
RESIDENCE PHONE 704-847-7467	BUSINESS PHONE 704-249-8665	VEHICLE I.D. NO. J T 2 B K 1 8 U 8 2 0 0 6 2 5 3 3		SELLING DEALER NO.
COMMENTS		F.T.E. NO.	P.O. NO.	R.O. DATE 01/18/14
				REPRINT# 1

PARTS	QTY	FP NUMBER	DESCRIPTION	LIST PRICE	UNIT PRICE	PRICE	
VALUE PLUS COOLING SYSTEM EXCHANGE R3920 & 1 GAL COOLANT							
VALUE PLUS COOLING SYSTEM EXCHANGE R3920 & 1 GAL COOLANT							
	1	R3920	COOLING KIT	33.77	33.77	33.77	
	1	00272-1LLAC-01	ANTIFREEZE GALLON	37.19	37.19	37.19	
TOTAL - PARTS						70.96	
JOB# 10 TOTALS							
						LABOR	
						PARTS	
						94.95	
						70.96	
JOB# 10 JOURNAL PREFIX TOCS						JOB# 10 TOTAL	
						165.91	
JOB# 11 CHARGES							
LABOR							
JOB# 11	40	TOZCLA	CLEAN & ADJ BRAKES	UNITS: 0.50	TECH(S): 229506	47.48	
CLEAN AND/OR ADJUST BRAKES							
CLEAN AND/OR ADJUST BRAKES							
PARTS	QTY	FP NUMBER	DESCRIPTION	LIST PRICE	UNIT PRICE	PRICE	
	1	00289-2BC00	NON-CHLOR BRAKE C	10.56	6.06	6.06	
TOTAL - PARTS						6.06	
JOB# 11 TOTALS							
						LABOR	
						PARTS	
						47.48	
						6.06	
JOB# 11 JOURNAL PREFIX TOCS						JOB# 11 TOTAL	
						53.54	
MISC							
JOB # A	A1	MISC				CONTROL NO.	
						31.00	
TOTAL - MISC						31.00	
COMMENTS							
DELETED OPERATION(S)							
30	TOZR1A	ATF T4					

MO: 281240

TERMS: CASH UNLESS ARRANGEMENTS MADE

DISCLAIMER OF WARRANTIES

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WARRANTY

CLAIM #1

CLAIM #2

SERVICE DEPT. HOURS

Mon - Thur 7:00AM - 8:00PM
Friday 7:00AM - 6:00PM
Saturday 7:00AM - 4:00PM

The Reynolds and Reynolds Company, ELKHART, IN 46515-1194 Q (07/13)



PARTS INVOICE
626

CELL: 704-249-8665

CUST NO.	TAX EXEMPT NUMBER	CUST. P. O. NO.	SHIP VIA	PAY	SOLD BY	INVOICE DATE	INVOICE NO.
132995	704-249-8665	CREDIT-MEMO		PENDING	JEFFREY KNELL	01/24/14	CM252858 TOR

B I L L T O
chemekadixon@yahoo.com
LYNDA BOGGS KLOTZ
115 CHESNEY GLEN DR
MATTHEWS, NC 28105-5899

S H I P T O

SHIP QTY	B. O. QTY	PART NUMBER / DESCRIPTION	BIN	LIST	NET	AMOUNT
-1	0	17451-23010 GASKET, EXHAUST P	1205E	21.06	21.06	-21.06
-1	0	17451-21060 GASKET, EXHAUST P	SPORD	48.59	48.59	-48.59
-1	0	17410-21261 PIPE ASSY, EXHAUS	SPORD	1192.11	1192.11	-1192.11
SUBTOTAL						-1261.76
TAX						-85.17
FREIGHT						0.00
PAY THIS AMOUNT						-1346.93

The Reynolds and Reynolds Company BRANTFORD, CC865925 Q (07/13)

NO CASH REFUND • NO REFUND ON SPECIAL ORDERS OR DEPOSITS • ALL CLAIMS MUST BE ACCOMPANIED BY THIS BILL
A 20% RE-STOCKING CHARGE • CHECKS REQUIRE 21 DAYS BANK CLEARING • ABSOLUTELY NO REFUND OR EXCHANGE AFTER 10 DAYS
ELECTRICAL ITEMS NOT RETURNABLE • ALL SPECIAL ORDERS MUST BE PAID IN FULL UPON ORDERING
ALL DISCOUNT COUPONS MUST BE REDEEMED AT TIME OF PURCHASE ONE COUPON PER CUSTOMER. PLEASE

ACCOUNTING COPY

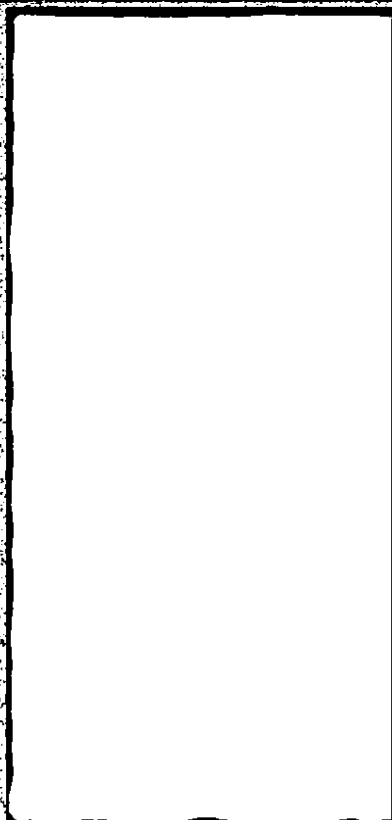
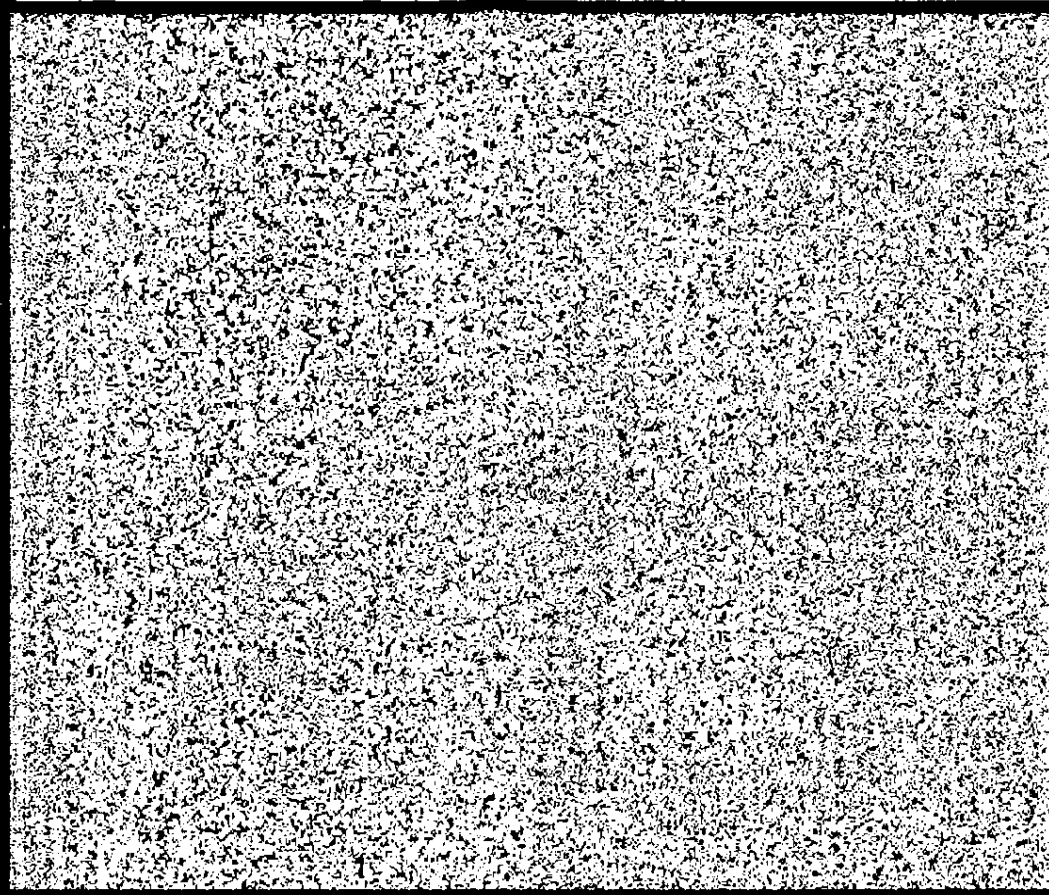


Scott Clark's
TOYOTA / SCION



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**** CREDIT MEMO ****
10:16:27 PAGE 1 OF 1
NET520



W KLOTZ 000169



Scott Clark's TOYOTA / SCION



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(704) 535-1972 • www.scottclarkstoyota.com

CELL: 704-249-866

CUST NO.	TAX EXEMPT NUMBER	CUST. P. O. NO.	SHIP VIA	PAY	GOLD BY	INVOICE DATE	INVOICE NO.
1329J5	704-249-8665		PENDING	JEFFREY KNELL		01/18/14	252858 TOR

B I L L
 TO: chmckadixon@yahoo.com
 LYNDA BOGGS KLOTZ
 115 CHESNEY GLEN DR
 MATTHEWS, NC 28105-5899

S H I P

SHIP QTY	B. O. QTY	PART NUMBER / DESCRIPTION	BIN	LIST	NET	AMOUNT
1	0	17451-23010 GASKET, EXHAUST P SHIPPED 0 SPECIAL ORDERED 1	1205E	21.06	21.06	21.06
1	0	17451-21060 GASKET, EXHAUST P SHIPPED 0 SPECIAL ORDERED 1	SPORD	48.59	48.59	48.59
1	0	17410-21261 PIPE ASSY, EXHAUS SHIPPED 0 SPECIAL ORDERED 1	SPORD	1192.11	1192.11	1192.11
SUBTOTAL						1261.76
TAX						85.17
FREIGHT						0.00
PAY THIS AMOUNT						1346.93

~~PAID~~

NO CASH REFUND • NO REFUND ON SPECIAL ORDERS OR DEPOSITS • ALL CLAIMS MUST BE ACCOMPANIED BY THIS BILL
 A 20% RE-STOCKING CHARGE • CHECKS REQUIRE 21 DAYS BANK CLEARING • ABSOLUTELY NO REFUND OR EXCHANGE AFTER 10 DAYS
 ELECTRICAL ITEMS NOT RETURNABLE • ALL SPECIAL ORDERS MUST BE PAID IN FULL UPON ORDERING
 ALL DISCOUNT COUPONS MUST BE REDEEMED AT TIME OF PURCHASE ONE COUPON PER CUSTOMER, PLEASE.

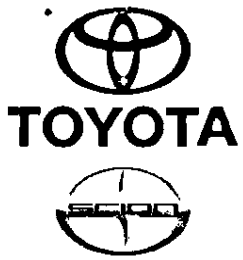
AS IS
 THE ONLY WARRANTIES APPLYING TO THIS PART(S) ARE THOSE WHICH MAY BE OFFERED BY THE MANUFACTURER. THE SELLING DEALER HEREBY EXPRESSLY DISCLAIMS ALL WARRANTIES, EITHER EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. AND NEITHER ASSUMES NOR AUTHORIZES ANY OTHER PERSON TO ASSUME FOR IT ANY LIABILITY IN CONNECTION WITH THE SALE OF THIS PART(S) AND/OR SERVICE. BUYER SHALL NOT BE ENTITLED TO RECOVER FROM THE SELLING DEALER ANY CONSEQUENTIAL DAMAGES, DAMAGES TO PROPERTY, DAMAGES FOR LOSS OF USE, LOSS OF TIME, LOSS OF PROFIT, OR INCOME, OR ANY OTHER INCIDENTAL DAMAGES.

CUSTOMER COPY

07:58:00 PAGE 1 OF 1
NET520

PARTS INVOICE

W KLOTZ 000170



Scott Clark's TOYOTA / SCION

13000 E. Independence Blvd.
MATTHEWS, NC 28105
(704) 535-1972
www.scottclarkstoyota.com



CELL: 704-249-866

CUSTOMER NO. 132995	ADVISOR PAT BROOKS	265542	TAG NO 4754	INVOICE DATE 06/02/14	INVOICE NO TOCS925067	
LYNDA BOGGS KLOTZ 115 CHESNEY GLEN DR MATTHEWS, NC 28105-5899 chemekadixon@yahoo.com	LABOR RATE	LICENSE NO.	MILEAGE 288,251	COLOR SUPER WHITE	STOCK NO.	
	YEAR / MAKE / MODEL 02 / TOYOTA / PRIUS/4DR SND HYBRID			DELIVERY DATE 01/25/03	DELIVERY MILES 387	
	VEHICLE I.D. NO. J T 2 B K 1 8 U 8 2 0 0 6 2 5 3 3			SELLING DEALER NO.	PRODUCTION DATE	
	F.T.E. NO.		P.C. NO.	R.O. DATE 05/31/14		
RESIDENCE PHONE 704-847-7467	BUSINESS PHONE 704-249-8665	COMMENTS				MO: 288251

JOB# 1 CHARGES

LABOR.....

1 50TOZ ENGINE ELECTRICAL UNITS: 0.50 TECH(S):1132 47.95
CHECK AUX BATTERY
REPLACED BATTERY

PARTS-----QTY---FP-NUMBER-----DESCRIPTION-----LIST PRICE-UNIT PRICE-
1 28800-31290 BATTERY 279.89 279.89 279.89
TOTAL - PARTS 279.89

MISC-----CODE-----DESCRIPTION-----CONTROL NO-----
D3 SENIOR CITIZEN DISCOUNT - PARTS -27.99
D4 SENIOR CITIZEN DISCOUNT - LABOR -4.80
TOTAL - MISC -32.79

JOB# 1 TOTALS

LABOR 47.95
PARTS 279.89
MISC -32.79

JOB# 1 JOURNAL PREFIX TOCS JOB# 1 TOTAL 295.05

MISC-----CODE-----DESCRIPTION-----CONTROL NO-----
JOB # A A1 MISC 4.20
TOTAL - MISC 4.20

COMMENTS
FOR MON

TOTALS-----

TERMS: CASH UNLESS ARRANGEMENTS MADE

DISCLAIMER OF WARRANTIES

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WARRANTY

CLAIM #1

CLAIM #2

TOTAL LABOR....	47.95
TOTAL PARTS....	279.89
TOTAL SUBLET....	0.00
TOTAL G.O.G....	0.00
TOTAL MISC CHG.	4.20
TOTAL MISC DISC	-32.79
TOTAL TAX.....	17.01
TOTAL INVOICE \$	316.26

THANK YOU FOR YOUR BUSINESS!!

CUSTOMER SIGNATURE

[Signature]

DATE 6/17/14

SERVICE DEPT. HOURS

Mon - Thur 7:00AM - 8:00PM
Friday 7:00AM - 6:00PM
Saturday 7:00AM - 4:00PM

The Reynolds and Reynolds Company, EXAMINER CCB1194 D (07/13)

MAACO COLLISION REPAIR & AUTO PAINTING CENTERS ARE LICENSED BY MAACO FRANCHISING, INC., AND ARE PRIVATELY OWNED AND OPERATED.

PAYMENT RECEIPT

11612



NAME WILLIAM KLOTZ			REPAIR ORDER 11612
ADDRESS 115 CHESNEYGLENN DR			HOME PHONE (704)847-7467
CITY MATTHEWS	STATE NC	ZIP 28105	WORK PHONE (704)249-8665
ESTIMATE 13391	EST. COMPLETION DATE		

MAACO COLLISION REPAIR & AUTO PAINTING

CENTER: M2111
8945 COVEDALE RD
CHARLOTTE, NC 28270
TEL: 704-845-1600 FAX: 704-844-9704

ESTIMATE DATE 01/10/2014
ESTIMATOR WAYNE
BODY EMPLOYEE _____
PAINT EMPLOYEE _____

YEAR/MARKET/MODEL 2002 TOYOTA PRIUS	
LICENSE/STOCK NO RTD2204	STATE VIN NC JT2BK18U820062533
DATE IN 01/10/2014	DATE OUT 01/13/2014
PAINT COLOR FACTORY WHITE	
MILEAGE IN _____	OUT _____

Charges

Description	Gross	Taxable	Tax
Paint Service	725.00	68.14	5.63
Body Supplies	42.44	0.00	0.00
Body Labor	44.00	3.19	0.26
Sublet/Towing	8.91	0.65	0.05
Total	820.35	66.40	4.65

Payments

Date	Type	Amount Paid
01/15/2014	Credit Card	825.00

Total Due 825.00
Total Paid 825.00
Balance Due 0.00

COMPLETION CERTIFICATE

I HAVE INSPECTED MY VEHICLE AND AM SATISFIED THAT THIS SHOP HAS COMPLETED THE SERVICES ON THE REPAIR ORDER REFERENCED ABOVE. I HAVE ALSO RECEIVED A COPY OF THIS REPAIR ORDER

X _____

PAYMENT INFORMATION

DEPOSITS/PAYMENT

DATE _____ REC'D BY _____

METHOD OF PAYMENT
 CASH
 CHECK
 CREDIT CARD

TOTAL INCL. TAX
 DEPOSITS/PAYMENT

BALANCE

PAYMENTS

DATE _____ REC'D BY _____

CASH
 CHECK
 CREDIT CARD

PAYMENT
 BALANCE

MAACO COLLISION REPAIR & AUTO PAINTING CENTERS ARE LICENSED BY MAACO FRANCHISING, INC., AND ARE PRIVATELY OWNED AND OPERATED.



KLOTZ, W 2002 TOYOTA PRIUS

11612

NAME WILLIAM KLOTZ	REPAIR ORDER 11612
ADDRESS 115 CHESNEYGLENN DR	HOME PHONE (704)847-7467
CITY MATTHEWS STATE NC ZIP 28105	WORK PHONE (704)249-8665
ESTIMATE 13391 EST. COMPLETION DATE	

MAACO COLLISION REPAIR & AUTO PAINTING

CENTER: M2111
 8945 COVEDALE RD
 CHARLOTTE, NC 28270
 TEL: 704-845-1600 FAX: 704-844-9704

ESTIMATE DATE 01/10/2014
 ESTIMATOR WAYNE
 BODY EMPLOYEE _____
 PAINT EMPLOYEE _____

YEAR/MAKE/MODEL
2002 TOYOTA PRIUS
 LICENSE/STOCK NO. STATE VIN
RTD2204 NC JT2BK18U820062533
 DATE IN DATE OUT INS TRADE & FLEET WARRANTY
01/10/2014 01/13/2014
 PAINT COLOR
FACTORY WHITE
 MILEAGE IN _____ OUT: _____

SURFACE REPAIR	LIGHT CHIP & SCRATCH REPAIR	99.95
SEALERS	2KURETHANE™	69.95
PROTECTION PACKAGES		
PAINT SERVICES	BASE COAT/CLEAR COAT™	749.95
ADDITIONAL PAINT CHARGES		
OTHER PAINT OPTIONS	REPAIR CHIPS ON HOOD CHARCOAL THIN OVER THIN	20.00
PAINT COMMENTS	CLEAN UP DOOR JAMBS AFTER PAINT	
SURFACE RECONDITIONING/ PAINT REMOVAL	FINE LINE MASK AS BEST AS POSSIBLE	

REPAIR/REPLACE	BODY REPAIR WORK	PART #	PRICE	GLASS	METAL	STRUCT	MECH	SUBLET	SPOT PAINT
X	REPAIR RUST SPOTS ON LEFT REAR QUARTER PANEL WHERE IT MEETS THE REAR BUMPER COVER				1.0				

MATERIALS & SUPPLIES _____
 REMARKS _____

PAINT	-939.85	725.00
SURFACE RECON	0.00	
MATERIALS & SUPPLY	42.44	
PARTS	0.00	
BODY LABOR	44.00	
SUBLET/ENV	-20.00	8.91
SPOT PAINT	0.00	
GROSS SALES	-1046.29	820.35
56.40	AMOUNT TAXABLE	
TAX	4.65	
TOTAL INCLUDING TAX	825.00	
DEPOSIT/PAYMENTS	825.00	

REPAIR ORDER

VERIFICATION

STATE OF GEORGIA)
)
 COUNTY OF RICHMOND) **VERIFICATION OF**
) **WILLIAM KLOTZ**

PERSONALLY appeared before the undersigned Notary Public, an officer duly authorized by law to administer oaths, WILLIAM KLOTZ, who on oath deposes and says that the facts stated in his Responses to Defendant's First Interrogatories and Request for Production of Documents are true and correct to the best of his knowledge, information and belief; that where the information contained in these Responses is within his own knowledge, it is true, and where derived from the information and knowledge of others, he believes the same to be true.

SUBSCRIBED AND SWORN TO)
 before me this 10th day of)
 May, 2018.)
 _____)
 Heather Ridgill [Notary Public])
 Richmond County, Georgia)
 My Commission Expires 03-12-21)

William R Klotz
 _____ (SEAL)
 WILLIAM KLOTZ

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

CIVIL CASE NUMBER 2018-CP-32-00527
IN THE COURT OF COMMON PLEAS

WILLIAM L. KLOTZ,)

Plaintiff,)

Vs.)

GENERAL JOE VANLIER,)

Defendant)

**MOTION TO WITHDRAW AS COUNSEL
AND STAY PROCEEDINGS**

Movant, Marion Chace Hawk (“Counsel”), respectfully moves for withdrawal of his appearance as counsel for Plaintiff William Klotz (“Klotz”) in the above-referenced matter, and to stay proceedings in this matter for thirty (30) days to allow Klotz opportunity to obtain substitute counsel. In support thereof, Counsel states the following:

1. Counsel’s withdrawal is mandatory under South Carolina Rules of Professional Conduct pursuant to rule 1.16(a)(1) (“the representation will result in violation of the Rules of Professional Conduct or other law”).

2. Counsel’s withdrawal is permissible under the South Carolina Rules of Professional Conduct pursuant to Rule 1.16(b)(1) (“withdrawal can be accomplished without material adverse effect on the interests of the client”); Rule 1.16(b)(5) (“the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services or payment therefore and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled”); Rule 1.16(b)(6) (“the representation will result in an unreasonable financial burden on the lawyer or has

ELECTRONICALLY FILED - 2018 Jul 19 3:29 PM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

been rendered unreasonably difficult by the client”); and/or Rule 1.16(b)(7) (“other good cause for withdrawal exists”).

3. That there is outstanding discovery pending in this matter.

4. That there are no scheduled hearings or depositions at this time. No depositions have been taken in this matter. Alternative dispute resolution is scheduled to be completed by 09/11/2018.

5. That Counsel moves for a stay of all proceedings in this matter for 30 days in order for Mr. Klotz to retain new counsel and to extend the deadline for alternative dispute resolution for thirty (30) days following the Court’s order on this motion.

6. As required, Klotz’s mailing address and phone number are provided on the Certificate of Service below, and Counsel states that he has advised Klotz that he should seek other counsel immediately on July 13, 2018. Counsel further states that he has given Klotz reasonable notice of Counsel’s intent to withdraw. The date(s) of the notice(s) are available to the Court upon request. Counsel has yet to receive confirmation of receipt by Klotz of the notice(s).

7. That Counsel moves for an order requiring Klotz to keep the court aware of any changes of his address or phone number and to notify the court as soon as possible if it is his intention to proceed Pro Se.

8. Finally, Counsel has complied with his duty to consult with opposing counsel before filing this motion. Counsel for Defendant Vanlier was consulted and consents to this motion as indicated by his signature below.

WHEREFORE, Marion Chace Hawk of the Hawk Law Group moves for an Order granting a withdrawal of his appearance as counsel for Klotz, and providing that he is relieved from any further responsibility associated with the representation of Klotz in this case. Counsel further

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requests a stay of any proceedings in this matter for thirty (30) days after the Court's entry of an Order on this motion to allow the plaintiff Klotz to obtain substitute counsel.

Respectfully submitted this 19th day of July 2018

/s/ MARION CHACE HAWK

SC State Bar No. 102046
Attorney for Plaintiff
HAWK LAW GROUP
338 Telfair Street
Augusta, GA 30901
(706) 722-3500
chawk@hawklawgroup.com

Consented to BY: /s/ James B. Lybrand, Jr. (3453)

JAMES B. LYBRAND, JR.
Attorneys for Defendant, General Joe Vanlier
Columbia, South Carolina
McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
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Email: lybrand@mrmml.com

ELECTRONICALLY FILED - 2018 Jul 19 3:29 PM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

CIVIL CASE NUMBER 2018-CP-32-00527
IN THE COURT OF COMMON PLEAS

WILLIAM L. KLOTZ,)

Plaintiff,)

CERTIFICATE OF SERVICE

Vs.)

GENERAL JOE VANLIER,)

Defendant)

The undersigned hereby certifies that a true copy of the foregoing has been served upon the plaintiff William Klotz and opposing counsel of record by mailing a copy properly addressed with sufficient postage affixed thereto this 19th day of July 2018.

William Klotz
115 Chesney Glen Dr
Matthews, NC 28105

Alternate address:
157 Ashepoo Dr.
Aiken, South Carolina 29803

JAMES B. LYBRAND, JR.
Attorneys for Defendant, General Joe Vanlier
Columbia, South Carolina
McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
P. O. Box 58
1704 Main Street – 2nd Floor (29201)
Columbia, SC 29202

/s/ MARION CHACE HAWK
SC State Bar No. 102046
Attorney for Plaintiff
HAWK LAW GROUP
338 Telfair Street
Augusta, GA 30901
(706) 722-3500
chawk@hawklawgroup.com

ELECTRONICALLY FILED - 2018 Jul 31 3:12 PM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

CIVIL CASE NUMBER 2018-CP-32-00527
IN THE COURT OF COMMON PLEAS

WILLIAM L. KLOTZ,)
Plaintiff,)

**CONSENT ORDER ON PLAINTIFF'S
MOTION TO WITHDRAW AS COUNSEL
AND STAY PROCEEDINGS**

Vs.)

GENERAL JOE VANLIER,)
Defendant)

Pursuant to Rules 11(b) of the South Carolina Rules of Civil Procedure, this matter comes before the Court on the consent of all parties who have appeared in this action for an order of the Court permitting plaintiff's counsel Marion Chace Hawk to be withdrawn as counsel in this matter and be relieved from all further proceedings related to matter.

Whereas, the COURT FINDS that Plaintiff's counsel has demonstrated good cause for said motion and, upon consideration, the Motion is GRANTED. The Court hereby further stays all proceeding in this matter for thirty (30) days and extends the deadline for alternative dispute resolution thirty (30) days from 09/11/2018. The Court hereby further orders Klotz to retain other counsel within 30 days of the signing of this order or inform the court of his intention to proceed Pro Se and keep the Court informed of any change in his address or phone number during this period.

SO ORDERED, this ____ day of _____, 2018.

HONORABLE JUDGE Allison Lee

637

Submitted by:

s/MARION CHACE HAWK

SC Bar No.: 102046

Attorney for Plaintiffs

OF COUNSEL:

Vic Hawk Law Group

338 Telfair Street

Augusta, GA 30901

Phone: 706-722-3500

Email: chawk@hawklawgroup.com

Consented to by:

Consented to BY: /s/ James B. Lybrand, Jr. (3453)

Attorneys for Defendant, General Joe Vanlier

Columbia, South Carolina

McDONALD, McKENZIE, RUBIN,

MILLER AND LYBRAND, LLP

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Email: lybrand@mrrml.com

ELECTRONICALLY FILED - 2018 Jul 31 3:12 PM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

638



Lexington Common Pleas

Case Caption: William L Klotz VS General Joe Vanlier

Case Number: 2018CP3200527

Type: Order/Consent Order

IT IS SO ORDERED!

s/Alison Renee Lee, Chief Administrative Judge

Electronically signed on 2016-07-31 13:20:04 page 3 of 3

ELECTRONICALLY FILED - 2018 Jul 31 3:12 PM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

FORM 4
639

STATE OF SOUTH CAROLINA
COUNTY OF Lexington
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2018CP3200527

William L Klotz
PLAINTIFF(S)

General Joe Vanlier
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED** (*CHECK REASON*): Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled); Other
- ACTION STRICKEN** (*CHECK REASON*): Rule 40(j), SCRPC; Bankruptcy; Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (*CHECK APPLICABLE BOX*): Affirmed; Reversed; Remanded; Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

The Order relieving the attorney for Plaintiff William Klotz is VACATED. A hearing on the motion will be scheduled.

ORDER INFORMATION

This order ends does not end the case. See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 08/21/2018 .

William L Klotz for William L Klotz
William L Klotz for William L Klotz

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

ELECTRONICALLY FILED - 2018 Aug 21 11:45 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

640

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ELECTRONICALLY FILED - 2018 Aug 21 11:45 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

641



Lexington Common Pleas

Case Caption: William L Klotz VS General Joe Vanlier

Case Number: 2018CP3200527

Type: Order/Electronic Form 4

IT IS SO ORDERED!

s/ Alison Renee Lee, Chief Administrative Judge

Electronically signed on 2018-08-21 09:50:59 page 3 of 3

ELECTRONICALLY FILED - 2018 Aug 21 11:45 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

STATE OF SOUTH CAROLINA
COUNTY OF Lexington
IN THE COURT OF COMMON PLEAS

FORM 4
642

JUDGMENT IN A CIVIL CASE

CASE NO. 2018CP3200527

William L Klotz
PLAINTIFF(S)

General Joe Vanlier
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled); Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy; Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

A hearing on Marion Hawk's Motion to be Relieved as Counsel was scheduled for and held on October 10, 2018. Present at the hearing were Attorney Marion Hawk and his client, Plaintiff William Klotz. Although Mr. Klotz wished for Mr. Hawk to proceed as his attorney, the Court determined that the parties have irreconcilable differences that calls for Mr. Hawk's withdrawal pursuant to Rule 1.16, South Carolina Rules of Professional Conduct.

Therefore, the Motion to be Relieved as Counsel is GRANTED. The Court hereby further stays all proceeding in this matter for thirty (30) days and extends the deadline for alternative dispute resolution thirty (30) days from the current deadline or from the date of this Order, whichever is later. The Court hereby further orders Klotz to retain other counsel within 30 days of the signing of this order or inform the court of his intention to proceed Pro Se and keep the Court informed of any change in his address or phone number during this period.

ORDER INFORMATION

This order ends does not end the case. See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 10/10/2018 .

William L Klotz for William L Klotz
William L Klotz for William L Klotz

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

ELECTRONICALLY FILED - 2018 Oct 12 8:15 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

643

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

ELECTRONICALLY FILED - 2018 Oct 12 8:15 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

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Lexington Common Pleas

Case Caption: William L Klotz VS General Joe Vanlier
Case Number: 2018CP3200527
Type: Order/Electronic Form 4

So Ordered

s/Walton J. McLeod, 2765

Electronically signed on 2018-10-10 20:49:45 page 3 of 3

ELECTRONICALLY FILED - 2018 Oct 12 8:15 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

STATE OF SOUTH CAROLINA

COUNTY OF LEXINGTON

William Klotz

Plaintiff(s),

v.

General Joe Vanlier

Defendant(s).

IN THE COURT OF COMMON PLEAS

DOCKET NO.: 2018-CP-32-00527

**ORDER STRIKING CASE UNDER RULE
40(j)**

Upon motion of the undersigned Plaintiff and counsel for Defendant,

IT IS HEREBY ORDERED that this action shall be stricken from the active docket with leave to restore pursuant to Rule 40(j) SCRCP.

IT IS FURTHER ORDERED that while the case remains in an inactive status, the parties are permitted to continue with all forms of discovery provided for and authorized under the South Carolina Rules of Civil Procedure as well as conduct mediation. After restoration of the case, the case will be reassigned a new docket number and placed on the general docket.

AND IT IS SO ORDERED.

Allison Renee Lee
Chief Administrative Judge
Eleventh Judicial Circuit

ELECTRONICALLY FILED - 2019 Apr 03 10:40 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

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McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
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Columbia, SC 29202
P: 803. 223.6156
F: 803. 929-3530
Email: lybrand@mrmml.com

W. L. Klotz 3/11/19
BY: William L. Klotz
Plaintiff (Pro Se)

BY: /s/ James B. Lybrand, Jr. (3453)
JAMES B. LYBRAND, JR.
Attorneys for Defendant

ELECTRONICALLY FILED - 2019 Apr 03 10:40 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

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Lexington Common Pleas

Case Caption: William L Klotz VS General Joe Vanlier

Case Number: 2018CP3200527

Type: Order/Consent Order

IT IS SO ORDERED!

s/ Alison Renee Lee, Chief Administrative Judge

Electronically signed on 2019-04-03 10:33:41 page 3 of 3

ELECTRONICALLY FILED - 2019 Apr 03 10:40 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

ELECTRONICALLY FILED - 2020 Apr 03 11:12 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

WILLIAM L. KLOTZ,)

Plaintiff,)

ORDER TO RESTORE FORMER CASE NUMBER 2018-CP-32-00527 IN THE COURT OF COMMON PLEAS TO THE GENERAL DOCKET WITH A NEW DOCKET NUMBER PURSUANT TO RULE 40(j)

GENERAL JOE VANLIER,)

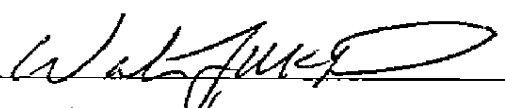
Defendant)

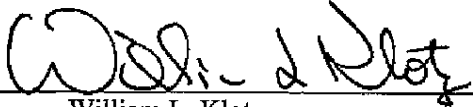
Upon motion of the undersigned Plaintiff and concurring counsel for Defendant,

IT IS HEREBY ORDERED that this action shall be taken to restore the captioned former case to the ACTIVE GENERAL DOCKET with new Case Number _____ timely pursuant to Rule 40(j) SCRCP.

IT IS FURTHER ORDERED that once restored the parties may continue all forms of Discovery provided for and authorized under the South Carolina Rules of Civil Procedure as well as conduct Mediation and/or ADR.

AND IT IS SO ORDERED.

Print: 
WALTON J. McLEOD
CHIEF ADMINISTRATIVE JUDGE
11TH JUDICIAL CIRCUIT

BY: 
William L. Klotz
Plaintiff Pro Se

BY: /s/James B. Lybrand, Jr. (3453)
Attorneys for the Defendant

McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
P. O. Box 58
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(29201)
Columbia, SC 29202
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F: 803. 929-3530
Email: lybrandj@mrmml.com

MOTION TO RESTORE FORMER CASE NUMBER 2018-CP-32-00527 IN THE COURT OF COMMON PLEAS TO THE GENERAL DOCKET WITH A NEW DOCKET NUMBER PURSUANT TO RULE 40(j)

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

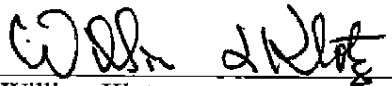
WILLIAM L. KLOTZ,)
Plaintiff,)

Vs.)

GENERAL JOE VANLIER,)
Defendant)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing has been served upon opposing counsel of record by mailing a copy properly addressed with sufficient postage affixed thereto this 16th Day of March, 2020.



William Klotz
157 Ashepoo Dr.
Aiken, South Carolina 29803

JAMES B. LYBRAND, JR.
Attorneys for Defendant, General Joe Vanlier
Columbia, South Carolina
McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
P. O. Box 58
1704 Main Street – 2nd Floor (29201)
Columbia, SC 29202

ELECTRONICALLY FILED - 2020 Apr 03 11:12 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461

ELECTRONICALLY FILED - 2020 Apr 03 11:12 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461

March 15, 2020

William L Klotz
157 Ashepoo Dr
Aiken, SC 29803

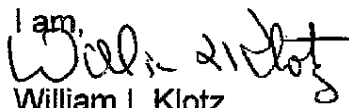
Email WLK_chemengr@hotmail.com, Tel. 704-249-8665

Lisa M. Comer
Clerk of Court
205 East Main Street
Suite 128
Lexington, SC 29072
Office: (803) 785-8212
Fax: (803) 785-2215

Subject: Timely Submission of Motion to Chief Administration Judge
Lexington County for 40(j) Case to General Docket with New Case Number

Dear Ms Comer:

Please submit to the Lexington County Chief Administrative Judge the attached "Motion to Restore Former Case Number 2018-CP-32-00527 in the Court of Common Pleas to the General Docket with a New Docket Number" in timely response to the attached Rule 40(j) Order which was Electronically Signed by Judge Alison Lee, Court of Common Pleas. It is my understanding that this Motion must be submitted 10 days before the expiration of the attached order, i.e. 10 days before April 3, 2020. This motion is not contested or objected to by the Attorney for the Defendant, Mr. James B. Lybrand. Enclosed is a \$25 filing fee Money Order and a Proposed Order for the Judge's signature. Also enclosed is a \$150 money order for the fee to complete the new docketing of the case for 40(j). Please notify me as soon as possible of any other paperwork or procedures required to complete the docketing of the new case, at my above email or telephone.

I am,

William L Klotz,
Plaintiff, Pro Se
ENCLOSURES (4)
M.O. (2)

ELECTRONICALLY FILED - 2020 Apr 03 11:12 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

WILLIAM L. KLOTZ,)

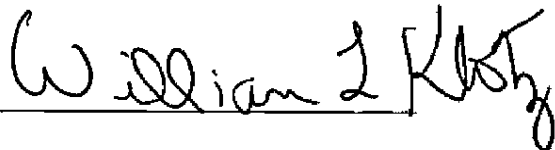
Plaintiff,)

MOTION TO RESTORE FORMER CASE NUMBER 2018-CP-32-00527 IN THE COURT OF COMMON PLEAS TO THE GENERAL DOCKET WITH A NEW DOCKET NUMBER PURSUANT TO RULE 40(j)

GENERAL JOE VANLIER,)

Defendant)

I, WILLIAM KLOTZ, hereby move for timely restoration in accordance with Rule 40(j) of the above captioned case former 2018-CP-32-00527 to the GENERAL DOCKET with a new case number, and continuance of ADR option. 40(j) Order by Alison Lee Chief Administrative Judge attached. So moved by:



March 15, 2020

William L Klotz, Acting Pro Se

William L Klotz

157 Ashepoo Dr, Aiken, SC (704) 249-8665 29803 WLK_chemengr@hotmail.com

Consented to BY: /s/ James B. Lybrand, Jr. (3453) per attached

JAMES B. LYBRAND, JR.
Attorneys for Defendant, General Joe Vanlier
Columbia, South Carolina
McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
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Email: lybrand@mrmml.com

STATE OF SOUTH CAROLINA
 COUNTY OF LEXINGTON
 William Klotz

Plaintiff(s),

 v.

 General Joe Vanlier

Defendant(s).

IN THE COURT OF COMMON PLEAS
 DOCKET NO.: 2018-CP-32-00527

**ORDER STRIKING CASE UNDER RULE
 40(j)**

Upon motion of the undersigned Plaintiff and counsel for Defendant,
 IT IS HEREBY ORDERED that this action shall be stricken from the active docket with
 leave to restore pursuant to Rule 40(j) SCRPC.

IT IS FURTHER ORDERED that while the case remains in an inactive status, the parties
 are permitted to continue with all forms of discovery provided for and authorized under the
 South Carolina Rules of Civil Procedure as well as conduct mediation. After restoration of the
 case, the case will be reassigned a new docket number and placed on the general docket.

AND IT IS SO ORDERED.

 Allison Renee Lee
 Chief Administrative Judge
 Eleventh Judicial Circuit

ELECTRONICALLY FILED - 2020 Apr 03 11:12 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461
 ELECTRONICALLY FILED - 2019 Apr 03 10:40 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

653

McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
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1704 Main Street - 2nd Floor (29201)
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F: 803. 929-3530
Email: lybrand@mmrml.com

W. L. Klotz 3/11/19
BY: William L. Klotz
Plaintiff (Pro Se)

BY: /s/ James B. Lybrand, Jr. (3453)
JAMES B. LYBRAND, JR.
Attorneys for Defendant

ELECTRONICALLY FILED - 2020 Apr 03 11:12 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461
ELECTRONICALLY FILED - 2019 Apr 03 10:40 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

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Lexington Common Pleas

Case Caption: William L Klotz VS General Joe Vanlier
Case Number: 2018CP3200527
Type: Order/Consent Order

IT IS SO ORDERED!

s/ Alison Renee Lee, Chief Administrative Judge

Electronically signed on 2019-04-03 10:33:41 page 3 of 3

ELECTRONICALLY FILED - 2020 Apr 03 11:12 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461
ELECTRONICALLY FILED - 2019 Apr 03 10:40 AM - LEXINGTON - COMMON PLEAS - CASE#2018CP3200527

STATE OF SOUTH CAROLINA)
) IN THE COURT OF COMMON PLEAS
 COUNTY OF LEXINGTON)
 William Klotz,) Docket No.: 2020-CP-32-01461
)
 Plaintiff,)
)
 v.) **PROOF OF ADR OR EXEMPTION**
)
 General Joe Vanlier,)
)
 Defendant.)

PURSUANT to the South Carolina Alternative Dispute Resolution Rules (SCADR):

A. _____ I certify that this case is exempt from ADR for the following reason and the parties wish to exercise that exemption:

_____	_____
Plaintiff/Attorney for Plaintiff	Defendant/Attorney for Defendant
_____	_____
Print Name	Print Name
_____	_____
Phone/Fax	Phone/Fax
Date: _____	

- B. X 1. Alternative Dispute Resolution (ADR) was conducted in the form of: **Mediation**
2. The neutral was **Walter B. Todd Jr.**
3. The ADR was conducted on **February 26, 2021.**
4. As a result of ADR, this case should be considered:
- Fully Settled.
 - by Consent Judgment, to be filed by _____
 - Voluntary Dismissal to be filed by _____
 - Partially Settled

ELECTRONICALLY FILED - 2021 Mar 11 10:10 AM - LEXINGTON - COMMON PLEAS - CASE#2020CP3201461

- At an impasse
- In need of further ADR I ___ am / ___ am not willing to continue as neutral. I recommend that ADR resume as soon as the parties complete discovery
- 5. Plaintiff was present.
Defendant was present through his authorized representative.
- 6. Other participants were:
 - Attorney(s) for Plaintiff: Pro Se
 - Attorney(s) for Defendant: James B. Lybrand, Jr.
 - Representative for Insurance Carrier
 - Guardian *ad Litem*
 - Experts
 - Others
- 7. Choice of the neutral was by:
 - Stipulation
 - Court Order
- 8. The total number of hours spent in ADR was: 4.0 hours
- 9. Further comments of the neutral: None



Walter B. Todd Jr., SC Bar #5593
Walter B. Todd Jr. PC
PO Box 1549
Columbia, SC 29202
Phone: (803) 753-7952

Date: February 26, 2021

STATE OF SOUTH CAROLINA)
COUNTY OF LEXINGTON)

CIVIL CASE NUMBER 2020-CP-32-01461
IN THE COURT OF COMMON PLEAS

WILLIAM L. KLOTZ,)
Plaintiff,)

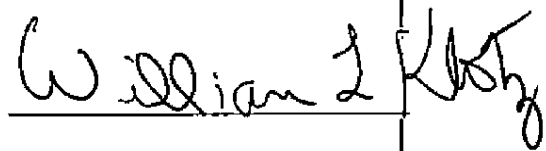
PRE-TRIAL UNCONTESTED MOTION FOR CONTINUANCE

GENERAL JOE VANLIER,)
Defendant)

I, **WILLIAM KLOTZ**, hereby move for a continuance for an additional 21 days from September 27, 2021 with the following justifications:

1. This will timely allow me to receive the Pfizer COVID-19 Booster Shot, having previously been fully vaccinated by the Pfizer vaccine, with allowance for two weeks for this booster to provide maximum immunity.
2. Mr. James Lybrand, counsel for Defense, has consented to Continuance.

So moved by



September 27, 2021

William L Klotz, Acting Pro Se

FILED
2021 OCT -1 AM 8:54
LISA M. COMER
CLERK OF COURT
LEXINGTON SC

William L Klotz

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Consented to BY: /s/ James B. Lybrand, Jr. (3453)
JAMES B. LYBRAND, JR., Email: lybrand@mmrml.com
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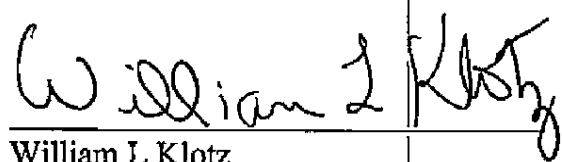
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CERTIFICATE OF NOTIFICATION

This is to certify that I have this day notified by a true and correct copy of the within Motion for Continuance to the following parties in this case by placing same in the United States Mail, postage prepaid, addressed as follows:

JAMES B. LYBRAND, JR.
Columbia, South Carolina
McDONALD, McKENZIE, RUBIN,
MILLER AND LYBRAND, LLP
P. O. Box 58
1704 Main Street – 2nd Floor (29201)
Columbia, SC 29202

Dated this 27th day of September, 2021



William L Klotz
Plaintiff Pro Se

FILED
2021 OCT -1 AM 8:54
LISA M. COPIER
CLERK OF COURT
LEXINGTON SC

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Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

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Lexington Common Pleas

Case Caption: William L Klotz VS General Joe Vanlier
Case Number: 2020CP3201461
Type: Order/Scheduling Order

Circuit Judge (Code #2050)
s/ William P. Keesley

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October 19, 2022

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
 Clerk, South Carolina Court of Appeals
 P.O. Box 11629
 Columbia, SC 29211

Re: William Lee Klotz v. General Joe Valier
 In the Court of Appeals – Case No.: 2022-000263

Dear Ms. Kitchings:

Enclosed herewith is the RESPONDENT’S INITIAL BRIEF, RESPONDENT’S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD OF APPEAL, and our CERTIFICATE OF SERVICE of those items on Appellant.


By copy of this letter to Appellant, I am requesting that he ensure that all Matters identified by Respondent in his Designation are included in the Record on Appeal. If he has questions, I request that he contact your office.

With kind regards,

Very truly yours,

James B. Lybrand, Jr.

JBLjr/bg
 Enclosures

cc:  William Lee Klotz

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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM LEXINGTON COUNTY
Walton J. McLeod, IV, Circuit Court Judge

Appellate Case No.: 2022-000263

RECEIVED

OCT 19 2022

SC Court of Appeals

William Klotz

Appellant

v.

General Joe Vanlier

Respondent

RESPONDENT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent proposes the following be included in the Record on Appeal:

1. Appellant's Complaint
2. Respondent's Answer
3. Appellant's Response to Respondents First Interrogatories dated May 14, 2018
4. Motion to Withdraw as Counsel
5. Consent Order on Plaintiff's Motion to Withdraw as Counsel
6. Order Vacating Plaintiff's Motion to be Relieved as Counsel
7. Order granting Plaintiff's Motion to be Relieved as Counsel
8. Order Striking case under Rule 40 (j)
9. Order Restoring case under Rule 40 (j)
10. Proof of ADR
11. Motion for Continuance
12. Scheduling Order (Form 4) filed November 4, 2021
13. Respondent's Pre-Trial Brief dated February 10, 2022
14. Transcript of Proceedings of February 14-15, 2022 as follows: P. 18-23, 28, 40-46, 49-67, 71-74, 78-84, 85, 96, 106, 109-110, 124-126, 128-129 129, 146-156, 159-161, 164-165
15. Jury Verdict Form

STATEMENT OF QUALIFICATIONS FOR APPELLANT AS TRIAL WITNESS

Appellant is in fact a “polymath” (knowledgeable of diverse subjects) and an “autodidact” (able to self teach) by virtue of volition, nurture, education, aptitude, and heredity. These were implied in statements to the jury and testimony at trial. In the order of these, when I was age 4, my father passed away from infection due to a poorly performed disk back surgery. He was sent home to die, and passed away in the upper front room of our modest townhouse in Richmond, VA. Afterwards, I went down to our front porch, and saw jet trails overhead, and cars and trucks passing on our cobblestone street. I thought, we should now be able to understand the basic rules why these things can happen, so asked the Almighty, whether or not I go to heaven, I would like to know what’s behind it all, before my time is done. I feel this has been granted.

So I subsequently applied myself to learn everything. My mother, rearing my brother and myself, bought books of all sorts, including three sets of encyclopedias. I learned what science was, and it seemed the best path to follow. One science teacher allowed me to bring home lab equipment such as microscopes, telescopes, glassware, and chemicals for experiments. My mother bought a chemistry set for me. Our townhouse had a dirt floor basement with no head room. My mother, an attractive woman, dug it down a foot and a half, carrying out the dirt and dumping it in the back yard, then had a cement floor and edge ledging put, with sheetrocked ceilings with lights, and had two rooms installed for experimentation for my brother and myself. In high school I took second place in the Virginia Junior Academy of

Sciences competition sponsored by Texaco Experiment Inc, developers of the Ram Jet engine. I applied to MIT. Their alumni conduct the interviews, and I went to the third final interview when you are "in" but discuss mainly financing. I asked for full financial support, so my mother would not have to mortgage her house. The only full financing available was to agree to teach for three years after graduation, and I thought this would slow my progress in understanding the grand scheme, so I declined, and attended the University of Virginia Charlottesville with aid and summer work support. UVA allowed me to select my own curriculum because of my high aptitude scores, both verbal and math. My Graduate Record Exam scores allowed me to join MENSA (top 2% aptitude) and a triple nine society (top 0.1% aptitude). I then attended NCSU graduate school, was drafted by the Army through the Lottery, who gave me the options of lab and military chemistry instructor or Vietnamese interpreter, I opted for the former. I then returned to NCSU to complete my MS, took a position with the State of NC as Environmental Chemistry Consultant, took the NC Engineer in Training Exam and returned to NCSU to complete a Master's in Chemical Engineering, took a position in the Research Triangle Park as Research Chemical Engineer where I developed a doctoral (PhD) program and also developed research business with the USEPA and US Army. I took the PE Exam and passed for general engineering, which allows me on a legal basis to make field mechanical and structural evaluations as Engineering Judgement. After 9 years I formed my own company and performed engineering and environmental services of various natures. After another 9 years I

worked with the Savannah River Site companies as a Safety Analyst for all aspects of safety scenarios. I was recognized as expert with explosions, including metal on metal explosions, such as the explosion of the rotor for an overdriven cylindrical brake. I am adept at the kinetics and dynamics of moving objects (physics), statics, and metallurgy, as tested by being awarded Professional Engineering Registration no. 0009532 in 1982, after completing a number of years as an Engineer in Training with 5 PE references certifying progressive engineering experience and character. I am qualified to sign and seal mechanical designs and process designs by experience and training. Each year since 1982 I have had 15 hrs continuing education units to maintain my Registration.