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APR 09 2021
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master in Equity

Appellate Case No. 2020-001023

Mark Giles Pafford, Appellant,

v.

Robert Wayne Duncan, Jr.,
Robert Duncan, Sr., and Frank Eason,
d/b/a "Rock City Heavy Hauling, Inc."
of whom
Robert Wayne Duncan, Jr. and
Robert Duncan, Sr. are the Respondents.

RECORD ON APPEAL

Volume 2

John Martin Foster
Post Office Box 106
Rock Hill, S. C. 29731-6106
803 324-8100
Attorney for Appellant

Stephen D. Schusterman
Post Office Box 4211
Rock Hill, South Carolina 29731
803 325-7788
Attorney for Respondents

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Print Check

View Check: #030440 Amount: $3,000.00 Date: 7/12/2016

heck Front

CASHONLY IF ALL CHECKS AND SECURITY FEATURES LISTED ON BACK INDICATE NO COPYING OR ALTERING

30440

Rock City Heavy Haul Inc.
184 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
07-7065/2532

07/12/2016

PAY TO THE ORDER OF Mark Pafford $ 3,000.00

Three thousand and 00/100 DOLLARS

A PROTECTED AGAINST FRAUD

Mark Pafford

Robert W Dunaway

MEMO

⑈030440⑈ ⑆253279659⑆310000008353 2⑈

Check Back

ENDORSE HERE

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

As the issuer, this *CheckLock*™ Secure Plus check may help reduce your risk of fraud and liability.

To learn how to protect your business, call our check fraud experts at 1-800-548-0289 or visit www.intuitmarket.com/fraudcenter

REPLICATING, FORGING OR ALTERING THIS CHECK IS EXTREMELY DIFFICULT DUE TO CheckLock™ HIGH SECURITY FEATURES

SECURITY FEATURES DO NOT DASH IF:

- Pattern on front of check does not vary in color from edge to edge
- Word "CheckLock™" is not visible in paper when held to light
- Pink bow does not back a reappear when reboot or breathed on
- "INTUIT™ CHECKLOCK™ SECURITY SYSTEM" not visible with magnification
- Stains or spots appear on front or back
- Ink on back looks pink or has disappeared
- Printed information appears tampered with
- Pink discoloration appears in Protecto Aware Fraud area and/or information appears broken, smudged and/or shows signs of paper damage

Multi-Colored Pinstripe Background
CheckLock™ Watermark
Heat Sensitive Ink
Security Border or Microprint Lines
Chemically Sensitive Paper
Fugitive Ink on Back
Toner Adhesion
Protected Against Fraud-Free

Visible Fibers
Invisible Fibers

- Red and blue fibers are not visible
- White and blue fibers are not visible under ultraviolet light
- "VOID" appears clearly to the left of this message
- "ORIGINAL DOCUMENT" cannot be read

VOID Indication
Security Watermark on Back

Listed and not listed check security features exceed industry standards.

Protect from visible on front and back of this check has security features
Pattern design is a combination mark of Check Payment Systems Association

CASH ONLY IF ALL CheckLock SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

30421

Rock City Heavy Haul LLC
154 North Anderson Road
Rock Hill, S.C. 29730

6-22-16

PAY TO THE ORDER OF MARK Pafford $ 5000.00

Five Thousand dollars & 00/100 DOLLARS

MEMO

⑈030421⑈ ⑆253271659⑆ 4600000043⑈

© 2014 INTUIT INC. # 1671 1-800-38-9810
Details on Back
Intuit CheckLock Secure Check

CASH ONLY IF ALL CheckLock SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

30420

Rock City Heavy Haul LLC
154 North Anderson Road
Rock Hill, S.C. 29730

6-22-16

PAY TO THE ORDER OF Mark Pafford $ 815.24

eight hundred fifteen 24/100 DOLLARS

MEMO

© 2014 INTUIT INC. # 1671 1-800-38-9810
Details on Back
Intuit CheckLock Secure Check

ROBERT W DUNCAN
DBA ROCK CITY TRUCK
5300 BLUE BIRD LN
YORK, SC 29745-9608

1018

67-776/532 9375
3984118848

DATE 5-12-16

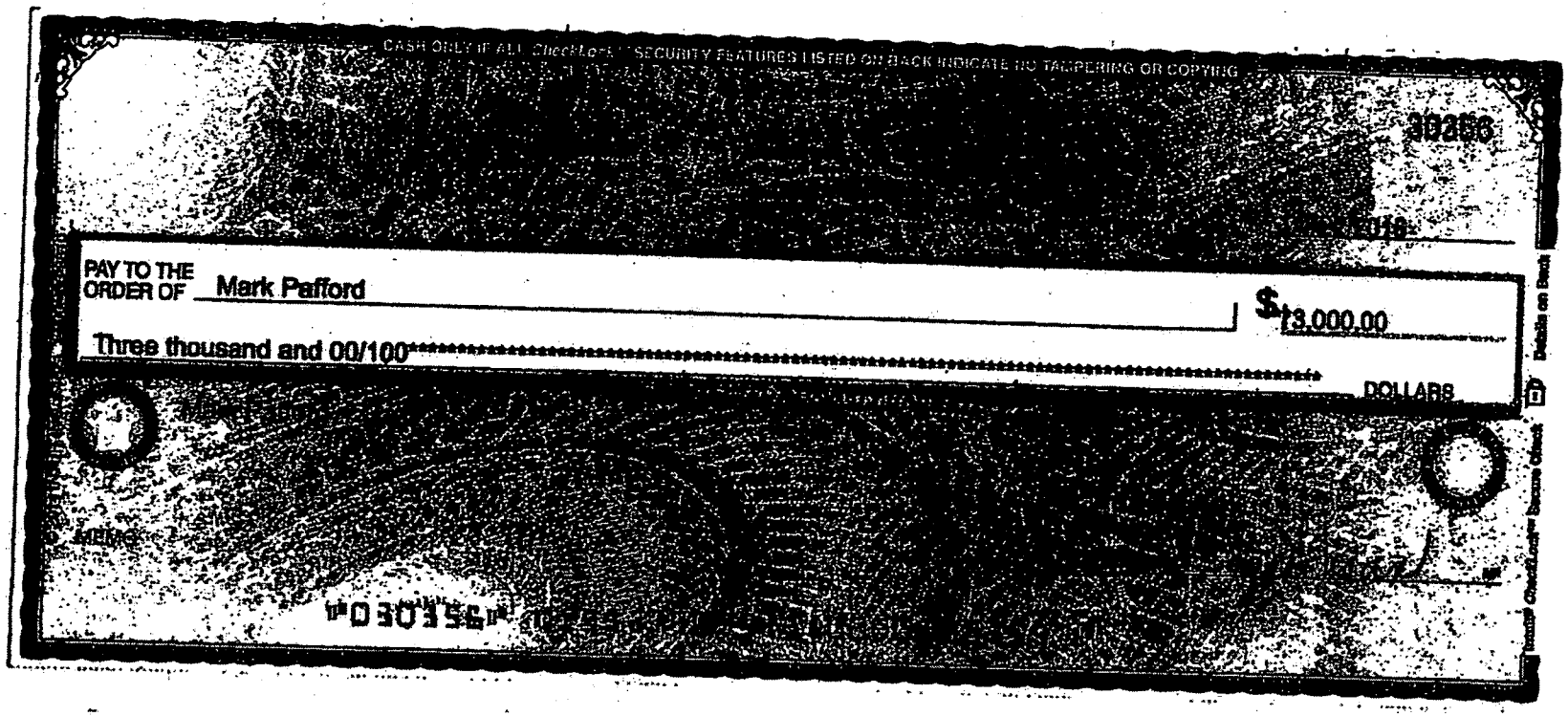
PAY TO THE ORDER OF Mark Pafford $ 20,000

Twenty Thousand +NO/100 DOLLARS

WELLS FARGO Wells Fargo Bank, N.A. South Carolina wellsfargo.com

FOR Purchase Truck

⑈000001018⑈ ⑆053207766⑆ 3984118848⑈



CASH ONLY IF ALL Check-Ex SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

30256

PAY TO THE ORDER OF Mark Pafford $ 3,000.00

Three thousand and 00/100 DOLLARS

MEMO

⑈030356⑈

03/24/2016 Mark Pafford 30302

671.42

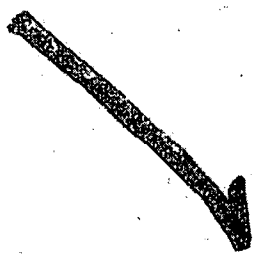
Fam Trust Checking xxxx3532 S10

Rock City Heavy Haul Inc.

671.42

03/24/2016 Mark Pafford 30302

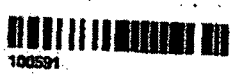
671.42



am Trust Checking xxxx3532 S10

671.42

10059/10059 674570 (8/15)



100591

Rev 2/14

6548 06 85453 03/19/2016 4555

RETURN POLICY DEFINITIONS

ase contact the Manager about any issues with your stay. Ramada or affiliates may contact you about goods and services unless
u call 877-227-3557 or write to Wyndham Worldwide Hotels, Inc. 1 Sylvan Way, Parsippany, NJ 07054 to opt out. View our Ramada
Worldwide website about privacy.

Thank you for staying with us.
It was our pleasure to serve you.

~~589.90~~

554.90

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Rock City Heavy Haul Inc.

03/24/2016 Mark Pafford

30301

5,000.00

Fam Trust Checking xxxx3532 S10

5,000.00

Rock City Heavy Haul Inc.

30301

03/24/2016 Mark Pafford

5,000.00

Fam Trust Checking xxxx3532 S10

5,000.00

10059/10059 874570 (8/15)

100591

Rev 2/1

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK COMMON PLEAS - CASE#2017CP4602487

VALID ONLY IF ALL CHECK SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR ALTERING

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
57-7368/2532

30265

03/04/2016

$ 3,000.00

PAY TO THE ORDER OF Mark Palford

Three thousand and 00/100 DOLLARS

Mark Palford

Robert W. Lunceford

⑈030265⑈ ⑆253279659⑆ 3100000083532⑈

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CHECK CHECKS AND BALANCES SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
87-7955/2532

30251

02/19/2016

PAY TO THE ORDER OF Mark Pafford $3,000.00

Three thousand and 00/100 DOLLARS

10 PERCENTER AGAINST FRAUD

Mark Pafford

MEMO

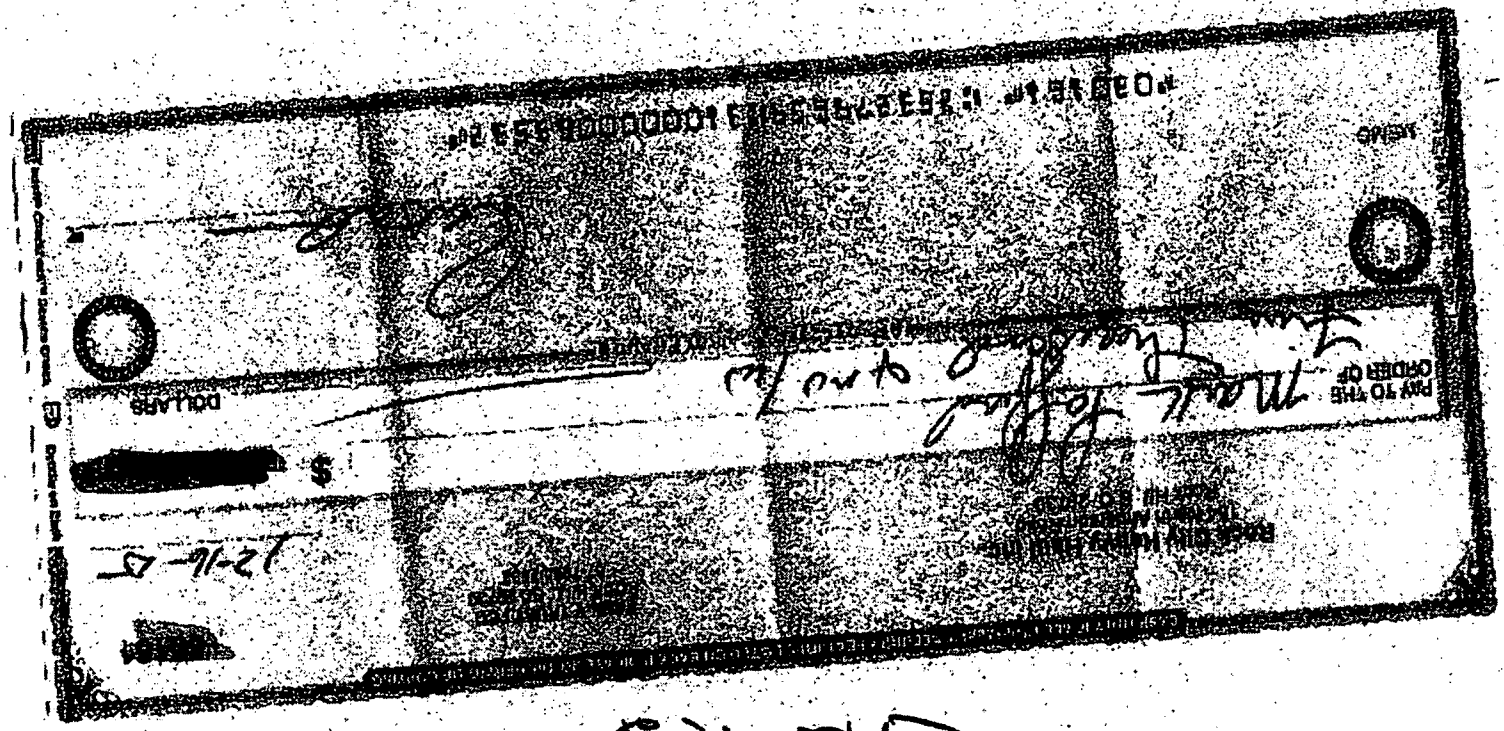
Robert W. Duncan Jr.

⑈030251⑈ ⑆253279659⑆340000008353 2⑈

4185503881

ENDORSE HERE

PAY TO THE ORDER OF



Cashed

*

90102

Rock City Heavy Haul Inc.
164 North Anderson Road
Rock Hill, S.C. 29730

11/17/2015

PAY TO THE ORDER OF Mark Pafford $ [redacted]

Two hundred forty-four and 46/100 DOLLARS

MEMO

90109

Rock City Heavy Haul Inc.
164 North Anderson Road
Rock Hill, S.C. 29730

11-17-15

PAY TO THE ORDER OF Mark Pafford $ [redacted]

Two Thousand + nine DOLLARS

MEMO

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - [redacted]

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Rock City Heavy Haul Inc.
464 North Anderson Road
Rock Hill, S.C. 29730

10-19-15

PAY TO THE ORDER OF MARY Hilard

Five Thousand + no/100

$ [redacted]

DOLLARS

MEMO

⑈003⑈ ⑆253179654⑆ 1⑈00000⑈53⑈

CASHED

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Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730

29835

6/18/2018

PAY TO THE ORDER OF Mark Pafford $ 7,000.00

Seven Thousand and 00/100 DOLLARS

Mark Pafford

7,000.00 Labor
5,000.00 Equipment
Per RD

MEMO

⑈029835⑈ ⑆253279659⑆310000008353 2⑈

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Rental Equipment

#029946# ⑆253279659⑆ 3100000083532#

Mark Pafford

Ten thousand and 00/100 $ **10,000.00

Mark Pafford

08/06/2015

29946

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
07-7866/2532

[redacted]

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
07-7866/2532

29945

08/06/2015

PAY TO THE ORDER OF Mark Pafford $ **2,377.61

Two thousand three hundred seventy-seven and 61/100 DOLLARS

Mark Pafford

Robert W. Dunaway

#029945# ⑆253279659⑆ 3100000083532#

(fuel - weather bill)

Wells Fargo Bank
Transaction Receipt

Nana

Store #0000327 0	Deposit
Account Number	XXXXXX4048
CHK 00007	
Number of Checks	1
Total Checks Amount	$3,000.00
Total Deposit	$3,000.00

Deposit will be available:

Date	Amount
07/17/2015	[redacted]
07/18/2015	[redacted]

Pg 1

Transaction # 144 0176
04:00PM 07/17/15
Deposit Credit Date: 07/17/15

Thank you, WHITNEY

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 4 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4[illegible]

Rock City Heavy Haul Inc.
184 North Anderson Road
Rock Hill, S.C. 29730

07/07/2015

PAY TO THE ORDER OF Mark Pafford $ [redacted]

Six hundred seventy-eight and 37/100 DOLLARS

Mark Pafford

Robert W. Duncan

⑈029874⑈ ⑆253279859⑆ 100000006353 2⑈

Expect Money (Hotel Weight Ticket)

Rock City Heavy Haul Inc.
184 North Anderson Road
Rock Hill, S.C. 29730

08/04/2015

PAY TO THE ORDER OF Mark Pafford $ [redacted]

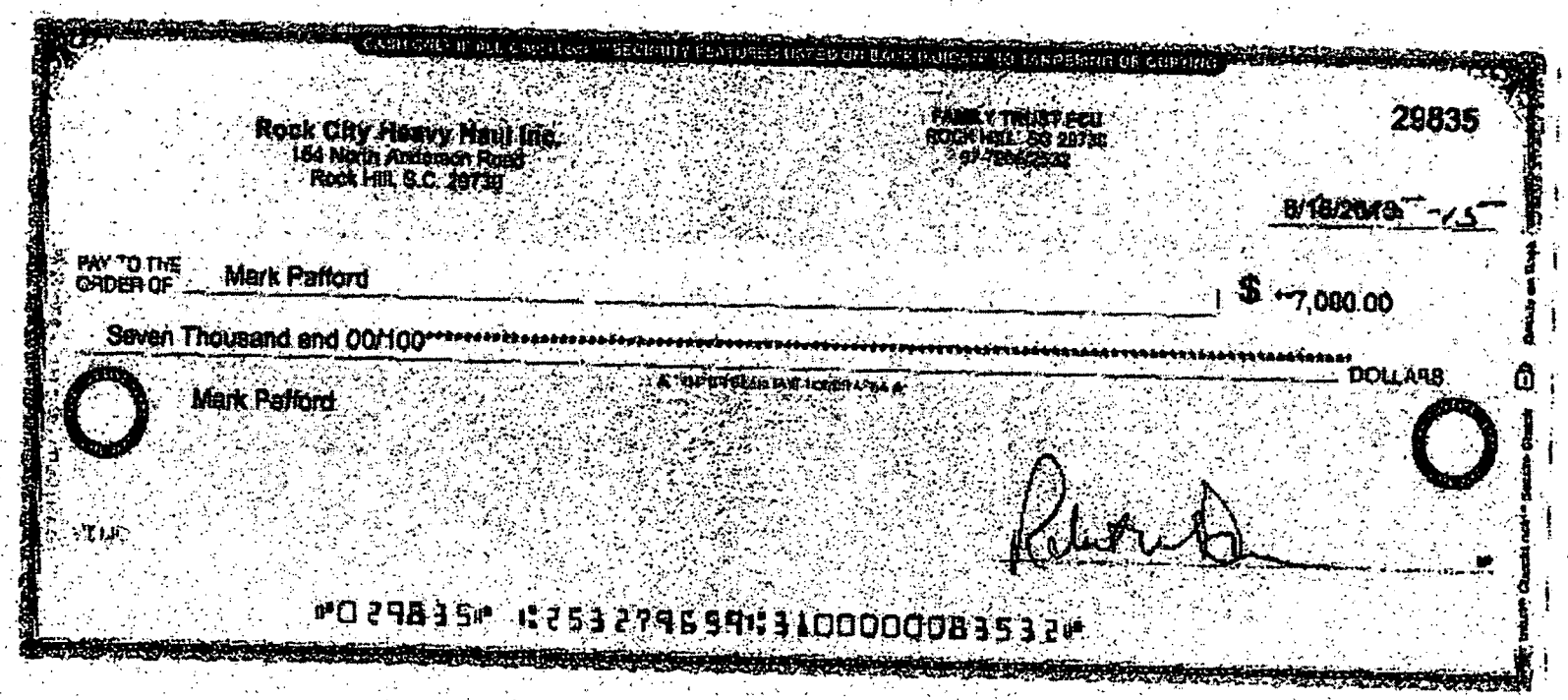
Seven hundred eighty-one and 85/100 DOLLARS

Mark Pafford

Robert W. Duncan

⑈029938⑈ ⑆253279859⑆ 100000006353 2⑈

Expect Money
(Hotel Weight Ticket)



Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730

29835

8/18/2016

PAY TO THE ORDER OF Mark Pafford $ *7,000.00

Seven Thousand and 00/100********** DOLLARS

Mark Pafford

⑆253279659⑆ 310000008353 2⑈ ⑈029835⑈

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29946

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

08/06/2015

PAY TO THE ORDER OF Mark Pafford $ **10,000.00

Ten thousand and 00/100 DOLLARS

Mark Pafford

⑈029946⑈ ⑆253279659⑆3100000083532⑈

29945

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

08/06/2015

PAY TO THE ORDER OF Mark Pafford $ **2,377.61

Two thousand three hundred seventy-seven and 61/100 DOLLARS

Mark Pafford

⑈029945⑈ ⑆253279659⑆3100000083532⑈

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
57-7085/2932

29803

5/25/15

PAY TO THE ORDER OF Marie Pafford $ 1000.00

One thousand and no/100 DOLLARS

A TAMPER RESISTANT TONER AREA A

MEMO

⑆029803⑆ ⑈253279659⑈310000008353 2⑈

4183214045

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CASH ONLY IF ALL CHECKS SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
57-7065/2532

29780

5/21/2015

PAY TO THE ORDER OF Mark Pafford $ **2,000.00

Two Thousand and 00/100********** DOLLARS

A TAMPER RESISTANT TONER AREA A

Mark Pafford

MEMO

Robert W. Duncan

⑈029780⑈ ⑆253279659⑆310000008353 2⑈

CHECK NOTE

Rock City Heavy Haul Inc. 29729

Mark Pafford 5/1/2015 2,000.00

Fam Trust Checking x 2,000.00

Rock City Heavy Haul Inc. 29729

Mark Pafford 5/1/2015 2,000.00

Fam Trust Checking x 2,000.00

26068 651316 (10/13) 015711 Rev 11/11

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Rock City Heavy Haul Inc. 29697

Mark Pafford 4/21/2015 2,000.00

Fam Trust Checking x 2,000.00

Rock City Heavy Haul Inc. 29698

Mark Pafford 4/21/2015 2,000.00

Fam Trust Checking x 2,000.00

26068 651315 (10/13) 018711 Rev 11/11

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

EXHIBIT "E"

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Mark Pafford Wages

Start Date February 10, 2015

End Date April 30, 2017

Prepared by Debbie Carson

Contact Information 234-525-8728

Week Ending	Amount Earned	Amount Paid	Check Number	Amount Due	Expenses Paid	Check Number	Equipment Paid	Check Number
2/14/2015	$ 1,000.00	$ -		$ 1,000.00				
2/21/2015	$ 1,000.00	$ -		$ 1,000.00				
2/28/2015	$ 1,000.00	$ -		$ 1,000.00				
3/7/2015	$ 1,000.00	$ -		$ 1,000.00				
3/14/2015	$ 1,000.00	$ -		$ 1,000.00				
3/21/2015	$ 1,000.00	$ -		$ 1,000.00				
3/28/2015	$ 1,000.00	$ -		$ 1,000.00				
4/4/2015	$ 1,000.00	$ -		$ 1,000.00				
4/11/2015	$ 1,000.00	$ -		$ 1,000.00				
4/18/2015	$ 1,000.00	$ -		$ 1,000.00				
4/25/2015	$ 1,000.00	$ 2,000.00	29697	$ (1,000.00)				
5/2/2015	$ 1,000.00	$ 2,000.00	29729	$ (1,000.00)				
5/9/2015	$ 1,000.00	$ -		$ 1,000.00				
5/16/2015	$ 1,000.00	$ -		$ 1,000.00				
5/23/2015	$ 1,000.00	$ 2,000.00	29780	$ (1,000.00)				
5/30/2015	$ 1,000.00	$ 1,000.00	29803	$ -				
6/6/2015	$ 1,000.00	$ -		$ 1,000.00				
6/13/2015	$ 1,000.00	$ -		$ 1,000.00				
6/20/2015	$ 1,000.00	$ 2,000.00	29835	$ (1,000.00)			$ 5,000.00	29835
*6/27/2015	$ 1,500.00	$ 2,500.00	618781	$ (1,000.00)				
7/4/2015	$ 1,500.00	$ 2,500.00	61871	$ (1,000.00)				
7/11/2015	$ 1,500.00	$ -		$ 1,500.00	$ 678.37	29874		
7/18/2015	$ 1,500.00	$ 3,000.00	620178	$ (1,500.00)				
7/25/2015	$ 1,500.00	$ -		$ 1,500.00				
8/1/2015	$ 1,500.00	$ 3,000.00	CASH & 620712	$ (1,500.00)				
8/8/2015	$ 1,500.00	$ -		$ 1,500.00	$ 781.85	29938	$ 10,000.00	29946
8/15/2015	$ 1,500.00	$ -		$ 1,500.00	$2,377.61	29945		
8/22/2015	$ 1,500.00	$ -		$ 1,500.00				
8/29/2015	$ 1,500.00	$ 2,000.00	Gary Dep	$ (500.00)				
9/5/2015	$ 1,500.00	$ -		$ 1,500.00				
9/12/2015	$ 1,500.00	$ -		$ 1,500.00				
9/19/2015	$ 1,500.00	$ 1,000.00	Gary Dep	$ 500.00				
9/26/2015	$ 1,500.00	$ -		$ 1,500.00				
10/3/2015	$ 1,500.00	$ -		$ 1,500.00				
10/10/2015	$ 1,500.00	$ -		$ 1,500.00				
10/17/2015	$ 1,500.00	$ -		$ 1,500.00				
10/24/2015	$ 1,500.00	$ 5,000.00	30081	$ (3,500.00)				
10/31/2015	$ 1,500.00	$ -		$ 1,500.00				
11/7/2015	$ 1,500.00	$ -		$ 1,500.00				
11/14/2015	$ 1,500.00	$ -		$ 1,500.00				
11/21/2015	$ 1,500.00	$ 2,000.00	30109	$ (500.00)				
11/28/2015	$ 1,500.00	$ -		$ 1,500.00				
12/5/2015	$ 1,500.00	$ -		$ 1,500.00				
12/12/2015	$ 1,500.00	$ -		$ 1,500.00				
12/19/2015	$ 1,500.00	$ 5,000.00	30161	$ (3,500.00)				
12/26/2015	$ 1,500.00	$ -		$ 1,500.00				
Total 2015	$ 59,500.00	$ 35,000.00		$ 24,500.00	$3,837.83		$ 15,000.00	
1/2/2016	$ 1,500.00	$ -		$ 1,500.00				

Mark Pafford Wages
Start Date February 10, 2015
End Date April 30, 2017

Week Ending	Amount Earned	Amount Paid	Check Number	Amount Due	Expenses Paid	Check Number	Equipment Paid	Check Number
1/9/2016	$ 1,500.00	$ -		$ 1,500.00				
1/16/2016	$ 1,500.00	$ -		$ 1,500.00				
1/23/2016	$ 1,500.00	$ -		$ 1,500.00				
1/30/2016	$ 1,500.00	$ -		$ 1,500.00				
2/6/2016	$ 1,500.00	$ -		$ 1,500.00				
2/13/2016	$ 1,500.00	$ -		$ 1,500.00				
2/20/2016	$ 1,500.00	$ 3,000.00	30251	$ (1,500.00)				
2/27/2016	$ 1,500.00			$ 1,500.00				
3/5/2016	$ 1,500.00	$ 3,000.00	30265	$ (1,500.00)				
3/12/2016	$ 1,500.00	$ -		$ 1,500.00				
3/19/2016	$ 1,500.00	$ -		$ 1,500.00				
3/26/2016	$ 1,500.00	$ 5,000.00	30301	$ (3,500.00)	$ 671.42	30302		
4/2/2016	$ 1,500.00	$ -		$ 1,500.00				
4/9/2016	$ 1,500.00	$ -		$ 1,500.00				
4/16/2016	$ 1,500.00	$ -		$ 1,500.00				
4/23/2016	$ 1,500.00	$ 3,000.00	30356	$ (1,500.00)				
4/30/2016	$ 1,500.00	$ -		$ 1,500.00				
5/7/2016	$ 1,500.00	$ -		$ 1,500.00				
5/14/2016	$ 1,500.00	$ -		$ 1,500.00			$ 20,000.00	1018
5/21/2016	$ 1,500.00	$ -		$ 1,500.00				
5/28/2016	$ 1,500.00	$ -		$ 1,500.00				
6/4/2016	$ 1,500.00	$ -		$ 1,500.00				
6/11/2016	$ 1,500.00	$ -		$ 1,500.00				
6/18/2016	$ 1,500.00	$ -		$ 1,500.00				
6/25/2016	$ 1,500.00	$ 5,000.00	30421	$ (3,500.00)	$ 815.24	30420		
7/2/2016	$ 1,500.00	$ -		$ 1,500.00				
7/9/2016	$ 1,500.00	$ -		$ 1,500.00				
7/16/2016	$ 1,500.00	$ 3,000.00	30440	$ (1,500.00)				
7/23/2016	$ 1,500.00	$ -		$ 1,500.00				
7/30/2016	$ 1,500.00	$ -		$ 1,500.00			$ 5,000.00	1082
8/6/2016	$ 1,500.00	$ -		$ 1,500.00				
8/13/2016	$ 1,500.00	$ -		$ 1,500.00	$ 147.20	30461		
8/20/2016	$ 1,500.00	$ -		$ 1,500.00				
8/27/2016	$ 1,500.00	$ 4,000.00	30472	$ (2,500.00)	$ 194.00	30469	$ 4,000.00	30472
9/3/2016	$ 1,500.00	$ -		$ 1,500.00				
9/10/2016	$ 1,500.00	$ -		$ 1,500.00	$ 77.64	30478		
9/17/2016	$ 1,500.00	$ 3,000.00	30491	$ (1,500.00)			$ 10,000.00	CASH
9/24/2016	$ 1,500.00	$ -		$ 1,500.00				
10/1/2016	$ 1,500.00	$ -		$ 1,500.00				
10/8/2016	$ 1,500.00	$ -		$ 1,500.00				
10/15/2016	$ 1,500.00	$ 3,000.00	30507	$ (1,500.00)				
10/22/2016	$ 1,500.00	$ -		$ 1,500.00				
10/29/2016	$ 1,500.00	$ 2,000.00	1162	$ (500.00)				
11/5/2016	$ 1,500.00	$ -		$ 1,500.00				
11/12/2016	$ 1,500.00	$ -		$ 1,500.00				
11/19/2016	$ 1,500.00	$ -		$ 1,500.00				
11/26/2016	$ 1,500.00	$ -		$ 1,500.00				
12/3/2016	$ 1,500.00	$ 4,000.00	30551	$ (2,500.00)				
12/10/2016	$ 1,500.00	$ -		$ 1,500.00				
12/17/2016	$ 1,500.00	$ -		$ 1,500.00				
12/24/2016	$ 1,500.00	$ -		$ 1,500.00				
12/31/2016	$ 1,500.00	$ 4,000.00	30572	$ (2,500.00)				

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Mark Pafford Wages
Start Date February 10, 2015
End Date April 30, 2017

Week Ending	Amount Earned	Amount Paid	Check Number	Amount Due	Expenses Paid	Check Number	Equipment Paid	Check Number
Total 2016	$ 79,500.00	$ 42,000.00		$ 37,500.00	$1,905.50		$ 39,000.00	
1/7/2017	$ 1,500.00	$ -		$ 1,500.00				
1/14/2017	$ 1,500.00	$ -		$ 1,500.00				
1/21/2017	$ 1,500.00	$ 4,000.00	1348	$ (2,500.00)				
1/28/2017	$ 1,500.00	$ -		$ 1,500.00				
2/4/2017	$ 1,500.00	$ -		$ 1,500.00				
2/11/2017	$ 1,500.00	$ -		$ 1,500.00				
2/18/2017	$ 1,500.00	$ -		$ 1,500.00				
2/25/2017	$ 1,500.00	$ 3,000.00	1301	$ (1,500.00)				
3/4/2017	$ 1,500.00	$ 2,000.00	92764363	$ (500.00)				
3/11/2017	$ 1,500.00	$ -		$ 1,500.00				
3/18/2017	$ 1,500.00	$ -		$ 1,500.00				
3/25/2017	$ 1,500.00	$ -		$ 1,500.00				
4/1/2017	$ 1,500.00	$ -		$ 1,500.00				
4/8/2017	$ 1,500.00	$ -		$ 1,500.00				
4/15/2017	$ 1,500.00	$ 4,000.00	30610	$ (2,500.00)			$ 4,000.00	30614
Total 2017	$ 22,500.00	$ 13,000.00		$ 9,500.00	$ -		$ 4,000.00	
Total 2015-2017	$161,500.00	$ 90,000.00		$ 71,500.00	$5,743.33		$ 58,000.00	
				Wage Due	Equipment Agreement	Equipment Paid	Equipment Due	
Total Amount Due				$ 71,500.00	$95,000.00	$58,000.00	$37,000.00	
Total Wages & Equipment Due		**$ 108,500.00**						

Total Wages Due	$ 161,500.00	**Total Equipment**	$ 95,000.00
If all payments were applied to Wages	$ 148,000.00	**Apply all Payments**	$ 148,000.00
Balance of Wages Due	$ 13,500.00	**Balance Equipment**	$ (53,000.00)
Equipment Agreement	$ 95,000.00	**Total Wages Due**	$ 161,500.00
Total Amount Due	$ 108,500.00	**Total Amount Due**	$ 108,500.00

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STATE OF SOUTH CAROLINA	]	IN THE COURT OF COMMON PLEAS
COUNTY OF YORK	]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD, Plaintiff,	]	VERIFICATION
v.	]	C.A. No. 2017-CP-46-02487
ROBERT WAYNE DUNCAN, Jr., ROBERT DUNCAN, Sr., and FRANK EASON, d/b/a "Rock City Heavy Hauling, Inc.", Defendants.	]	

PERSONALLY appeared before me, a notary public, the undersigned affiant, MARK GILES PAFFORD, who being duly sworn, deposes and says:

1. I am MARK GILES PAFFORD, the named Plaintiff in the above civil action. I have personal knowledge of all dealings between myself and the Defendants. I am familiar with my regularly kept business records. Those matters herein not based on my recollection are based upon such records.
2. The items attached to this Amended Complaint and incorporated herein (other than the incorporated records of the South Carolina Secretary of State) are a part of my regularly kept business records.
3. I have read the allegations of the Amended Complaint.
4. To the best of my information, knowledge and belief, the facts stated in the attached Amended Complaint, and its accompanying documents, are true. As to those matters stated on knowledge and information, insofar as the same lie within the area of dealings between the Defendants and myself, I am informed and believe the same to be true.

Mark Giles Pafford
MARK GILES PAFFORD

SWORN TO and subscribed before me on April 4, 2018
Ellen N. Smith
Notary Public for South Carolina
My commission expires: 03/04/2024

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ELECTRONICALLY FILED - 2018 May 04 11:08 AM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	SIXTEENTH JUDICIAL CIRCUIT
COUNTY OF YORK	)	
	)	
	)	
Mark Giles Pafford	)	Case No: 2017 CP 46-2487
Plaintiff	)	
	)	
	)	**AMENDED ANSWER AND**
	)	**COUNTERCLAIM**
vs.	)	**OF ROBERT WAYNE DUNCAN, JR.**
	)	
	)	
	)	
Robert Dwayne Duncan, Jr. Robert Duncan, Sr., and Frank Eason, d/b/a/ "Rock City Heavy Hauling, Inc.".	)	
Defendant.	)	
	)	

The Defendant, Robert Duncan, Jr., hereby answers the Plaintiff's amended complaint as follows:

AS TO FIRST CAUSE OF ACTION: CLAIM AND DELIVERY

1. The allegations of paragraphs 1, 2, 3 and 4 are admitted.
2. The allegations of paragraph 5, 6, 7, 8, 9, and 10.
3. As to the allegations that are contained in Plaintiff's Exhibit "B" which are incorporated into the amended complaint, and referred to in paragraph 11 of the amended complaint, the Defendant denies each and every allegation contained in Exhibit B.
4. The Defendant denies the allegations of paragraph 12.
5. The Defendant denies the allegations of paragraph 13.
6. The Defendant denies the allegations of paragraph 14.

AS A SECOND CAUSE OF ACTION: FAILURE TO PAY WAGES

7. The Defendant denies the allegations of paragraph 16

8. The Defendant admits the allegations of paragraph 17.

9. The Defendant denies the allegations of paragraph 18.

10. The Defendant admits that Plaintiff was an independent contractor driver who was to be paid One-Thousand and no/100 ($1,000.00) Dollars per week. The remaining allegations of paragraph 19 are denied.

11. The Defendant denies the allegations of paragraph 20.

12. The Defendant denies the allegations of paragraph 21.

13. The Defendant denies the allegations of paragraph 22.

14. The Defendant denies the allegations of paragraph 23.

15. The Defendant denies the allegations of paragraph 24.

16. The Defendant denies the allegations of paragraph 25.

17. The Defendant denies the allegations of paragraph 26.

18. The Defendant denies the allegations of paragraph 27.

19. The Defendant denies the allegations of paragraph 28.

20. The Defendant denies the allegations of paragraph 29.

COUNTERCLAIM
First Cause of Action - Breach

21. The Plaintiff is a citizen and resident of York County, South Carolina.

22. The Defendant is a citizen and resident of York County, South Carolina.

23. The property at issue, a 2003 Kenworth W red truck (hereinafter referred to as "truck"), is located in York County, South Carolina.

24. In February 2016, the Plaintiff and the Defendant entered into an oral agreement wherein the Defendant would purchase the truck from the Plaintiff. The parties agreed that the Defendant would make installment payments and upon these payments being made the

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Plaintiff would release the title to the truck to the Defendant.

25. The Defendant has made the required payments to the Plaintiff under the terms of the oral agreement.

26. The Defendant made these payments in reliance on the agreement between the parties that the Plaintiff would provide him with the title to the truck.

27. The Defendant has made improvements to the truck in reliance on the agreement of the parties that the Plaintiff would furnish him with the title to the truck after payments were made.

28. The Plaintiff is refusing and has failed to provide the title to the truck as required by the terms of the oral agreement despite receiving and accepting the payments.

29. The Defendant has recently discovered that the truck at issue in this case was fraudulently reported stolen by the Plaintiff.

30. Based upon information and belief, the Plaintiff has received payment for the stolen truck in the approximate amount of $35,000.00 by Sentry Insurance.

31. Based upon information and belief, the Plaintiff had reported the trailer stolen and/or was in the process of settling the insurance claim with Sentry Insurance when he was negotiating with the Defendant to purchase the truck.

32. The Defendant had no knowledge that this truck was reported stolen; that Plaintiff had recovered insurance proceeds or that the truck is titled to Sentry Insurance.

33. The Defendant has complied with all terms of the oral agreement.

34. The Defendant has suffered damages as a result of the Plaintiff refusing to comply with the agreement.

35. The Plaintiff is unable to transfer title to this truck because legally it is no longer his.

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36. In the event this Court deems that the Plaintiff is the rightful owner of the truck, the Defendant seeks an Order granting him the sole use, ownership and possession of the truck as well as requiring the Plaintiff to transfer the title of the vehicle to him.

37. In the alternative, if the Court finds the invalidity of the oral agreement, Defendant seeks an Order requiring the Plaintiff to return all funds he has paid as well as the reimburse him for the parts and increase in value of the truck due to improvements he made.

38. As a result of the Plaintiff's refusing to comply with the terms of the agreement, the Defendant has incurred attorney's fees and costs. The Defendant seeks an Order requiring the Plaintiff to reimburse him for attorney's fees.

For a Second Cause of Action - Fraud

39. To the extent not inconsistent herewith, the allegations of paragraphs 1-38 are incorporated herein.

40. At the time that the Plaintiff contacted the Defendant, the Plaintiff had already reported the truck stolen and based upon information and belief had filed a claim with Sentry Insurance.

41. The Plaintiff falsely represented to the Defendant that he was the rightful owner of the truck and had the ability and authority to sell the truck. The Plaintiff represented that he was in the position to transfer title to the truck upon payment. The Plaintiff never made any statement regarding the reporting of the truck as stolen or any claim filed with an insurance company.

42. The representation and oral agreement made by the Plaintiff to the Defendant was false and material. The Defendant would not have entered into an agreement with the Plaintiff if he knew that the vehicle had been reported stolen or the Plaintiff was attempting to

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defraud an insurance company.

43. The Plaintiff knew of the falsity of these representations when he made them to the Plaintiff and made these representation to the Defendant with the intent that Defendant would accept his offer to purchase the truck and he would be double paid for the truck

44. The Defendant had no knowledge that the truck was reported stolen or that an insurance claim was filed.

45. The Defendant was ignorant as to the false statements and representations of the Defendant.

46. The Defendant relied upon the Plaintiff's representations and statements when he agreed to purchase the truck from the Plaintiff.

47. As a result of Plaintiff's fraudulent conduct and representations, the Defendant has suffered a pecuniary loss including, but not limited to, the cost of the truck, improvements to the truck, and attorney's fees and costs.

For a Third Cause of Action – Negligent Misrepresentation

48. To the extent not inconsistent herewith, the allegations of paragraphs 1-47 are incorporated herein.

49. The Plaintiff falsely represented to the Defendant that he was the rightful owner of the vehicle.

50. The Plaintiff falsely represented to the Defendant that he had the authority to sell the truck to the Defendant.

51. The Plaintiff had a pecuniary interest in making these statements as he was in the position to receive $35,000.00

52. The Plaintiff had a duty of care to the Defendant to that information he communicated to

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the Defendant was truthful.

53. The Plaintiff breached this duty by failing to exercise due care in his representations.

54. The Defendant justifiably relied on the Plaintiff's representations when he entered into the agreement to purchase the truck.

55. As a result of the Plaintiff's representation, the Defendant has suffered a pecuniary loss including, payments for the truck, improvements to the truck and attorney's fees and costs.

WHEREFORE, having fully answered, the Defendant seeks dismissal of the Plaintiff's complaint as well as the following relief:

a. Order granting sole use, ownership and possession of the truck in the event it is determined that the Plaintiff is the rightful owner;

b. Order requiring the Plaintiff to transfer the title to truck to him immediately or in the alternative, requiring the Plaintiff to reimburse all funds paid, cost of all improvements as well as increase in value; and

c. Attorney's fees and such other relief as this Court deems just and proper.

S/Stephen D. Schusterman
Stephen D. Schusterman
SCHUSTERMAN LAW FIRM, PA
PO Box 4211
Rock Hill, SC 29732
Telephone: 803-325-7788
Facsimile: 803-325-7889

May 4, 2018

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ELECTRONICALLY FILED - 2018 May 04 11:11 AM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	SIXTEENTH JUDICIAL CIRCUIT
COUNTY OF YORK	)	
	)	
	)	
Mark Giles Pafford	)	Case No: 2017 CP 46-2487
Plaintiff	)	
	)	
	)	**AMENDED ANSWER AND**
	)	**COUNTERCLAIM**
vs.	)	**OF ROBERT DUNCAN, SR**
	)	
	)	
	)	
Robert Dwayne Duncan, Jr. Robert Duncan,	)	
Sr.; and Frank Eason, d/b/a/ "Rock City	)	
Heavy Hauling, Inc.".	)	
Defendant.	)	
	)	

The Defendant, Robert Duncan, Sr., hereby answers the Plaintiff's amended complaint as follows:

AS TO FIRST CAUSE OF ACTION: CLAIM AND DELIVERY

1. As to all of the allegations contained in this first cause of action: claim and delivery (Paragraphs 1 – 14) they do not appear to be against the Defendant, Frank Eason and thus do not require a response. To the extent that any of these allegations contained in paragraph 1-14 do require a response, the Defendant would respond as follows:

a. The Defendant admits the allegations of paragraph 1, 2, 3, and 4 are admitted.

b. The Defendant denies the allegations of Paragraph 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14.

AS A SECOND CAUSE OF ACTION: FAILURE TO PAY WAGES

2. The Defendant denies the allegations of Paragraph 16.

3. The Defendant admits the allegations of Paragraph 17.

4. The Defendant denies the allegation of Paragraph 18, 19, 20, 21, 22, 23, 24, 25, 26, 27,

28, and 29.

COUNTERCLAIM
First Cause of Action - Breach

5. The Plaintiff is a citizen and resident of York County, South Carolina.
6. The Defendant is a citizen and resident of York County, South Carolina.
7. The property at issue, a 2003 Kenworth W red truck (hereinafter referred to as "truck"), is located in York County, South Carolina.
8. In February 2016, the Plaintiff and the Defendant entered into an oral agreement wherein the Defendant would purchase the truck from the Plaintiff. The parties agreed that the Defendant would make installment payments and upon these payments being made the Plaintiff would release the title to the truck to the Defendant.
9. The Defendant has made the required payments to the Plaintiff under the terms of the oral agreement.
10. The Defendant made these payments in reliance on the agreement between the parties that the Plaintiff would provide him with the title to the truck.
11. The Defendant has made improvements to the truck in reliance on the agreement of the parties that the Plaintiff would furnish him with the title to the truck after payments were made.
12. The Plaintiff is refusing and has failed to provide the title to the truck as required by the terms of the oral agreement despite receiving and accepting the payments.
13. The Defendant has recently discovered that the truck at issue in this case was fraudulently reported stolen by the Plaintiff.
14. Based upon information and belief, the Plaintiff has received payment for the stolen truck in the approximate amount of $35,000.00 by Sentry Insurance.

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15. Based upon information and belief, the Plaintiff had reported the trailer stolen and/or was in the process of settling the insurance claim with Sentry Insurance when he was negotiating with the Defendant to purchase the truck.

16. The Defendant had no knowledge that this truck was reported stolen; that Plaintiff had recovered insurance proceeds or that the truck is titled to Sentry Insurance.

17. The Defendant has complied with all terms of the oral agreement.

18. The Defendant has suffered damages as a result of the Plaintiff refusing to comply with the agreement.

19. The Plaintiff is unable to transfer title to this truck because legally it is no longer his.

20. In the event this Court deems that the Plaintiff is the rightful owner of the truck, the Defendant seeks an Order granting him the sole use, ownership and possession of the truck as well as requiring the Plaintiff to transfer the title of the vehicle to him.

21. In the alternative, if the Court finds the invalidity of the oral agreement, Defendant seeks an Order requiring the Plaintiff to return all funds he has paid as well as the reimburse him for the parts and increase in value of the truck due to improvements he made.

22. As a result of the Plaintiff's refusing to comply with the terms of the agreement, the Defendant has incurred attorney's fees and costs. The Defendant seeks an Order requiring the Plaintiff to reimburse him for attorney's fees.

For a Second Cause of Action - Fraud

23. To the extent not inconsistent herewith, the allegations of paragraphs 1-38 are incorporated herein.

24. At the time that the Plaintiff contacted the Defendant, the Plaintiff had already reported the truck stolen and based upon information and belief had filed a claim with Sentry

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Insurance.

25. The Plaintiff falsely represented to the Defendant that he was the rightful owner of the truck and had the ability and authority to sell the truck. The Plaintiff represented that he was in the position to transfer title to the truck upon payment. The Plaintiff never made any statement regarding the reporting of the truck as stolen or any claim filed with an insurance company.

26. The representation and oral agreement made by the Plaintiff to the Defendant was false and material. The Defendant would not have entered into an agreement with the Plaintiff if he knew that the vehicle had been reported stolen or the Plaintiff was attempting to defraud an insurance company.

27. The Plaintiff knew of the falsity of these representations when he made them to the Plaintiff and made these representation to the Defendant with the intent that Defendant would accept his offer to purchase the truck and he would be double paid for the truck

28. The Defendant had no knowledge that the truck was reported stolen or that an insurance claim was filed.

29. The Defendant was ignorant as to the false statements and representations of the Defendant.

30. The Defendant relied upon the Plaintiff's representations and statements when he agreed to purchase the truck from the Plaintiff.

31. As a result of Plaintiff's fraudulent conduct and representations, the Defendant has suffered a pecuniary loss including, but not limited to, the cost of the truck, improvements to the truck, and attorney's fees and costs.

<u>For a Third Cause of Action – Negligent Misrepresentation</u>

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32. To the extent not inconsistent herewith, the allegations of paragraphs 1-47 are incorporated herein.

33. The Plaintiff falsely represented to the Defendant that he was the rightful owner of the vehicle.

34. The Plaintiff falsely represented to the Defendant that he had the authority to sell the truck to the Defendant.

35. The Plaintiff had a pecuniary interest in making these statements as he was in the position to receive $35,000.00

36. The Plaintiff had a duty of care to the Defendant to that information he communicated to the Defendant was truthful.

37. The Plaintiff breached this duty by failing to exercise due care in his representations.

38. The Defendant justifiably relied on the Plaintiff's representations when he entered into the agreement to purchase the truck.

39. As a result of the Plaintiff's representation, the Defendant has suffered a pecuniary loss including, payments for the truck, improvements to the truck and attorney's fees and costs.

WHEREFORE, having fully answered, the Defendant seeks dismissal of the Plaintiff's complaint as well as the following relief:

a. Order granting sole use, ownership and possession of the truck in the event it is determined that the Plaintiff is the rightful owner;

b. Order requiring the Plaintiff to transfer the title to truck to him immediately or in the alternative, requiring the Plaintiff to reimburse all funds paid, cost of all improvements as well as increase in value; and

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c. Attorney's fees and such other relief as this Court deems just and proper.

40.

WHEREFORE, having fully answered, the Defendant seeks dismissal of the Plaintiff's complaint as well as attorneys fees and cost for having to defend this action.

S/Stephen D. Schusterman
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SCHUSTERMAN LAW FIRM, PA
PO Box 4211
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Telephone: 803-325-7788
Facsimile: 803-325-7889

May 4 , 2018

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	SIXTEENTH JUDICIAL CIRCUIT
COUNTY OF YORK	)	
	)	
	)	
Mark Giles Pafford	)	Case No: 2017 CP 46-2487
Plaintiff	)	
	)	
	)	**AMENDED ANSWER AND**
	)	**MOTION TO DISMISS**
vs.	)	**OF FRANK EASON**
	)	
	)	
	)	
Robert Dwayne Duncan, Jr. Robert Duncan,	)	
Sr., and Frank Eason, d/b/a/ "Rock City	)	
Heavy Hauling, Inc.".	)	
Defendant.	)	
	)	

The Defendant, Frank Eason., hereby answers the Plaintiff's amended complaint as follows:

AS TO FIRST CAUSE OF ACTION: CLAIM AND DELIVERY

1. As to all of the allegations contained in this first cause of action: claim and delivery (Paragraphs 1 – 14) they do not appear to be against the Defendant, Frank Eason and thus do not require a response. To the extent that any of these allegations contained in paragraph 1-14 do require a response, the Defendant would respond as follows:

a. The Defendant admits the allegations of paragraph 1, 2, 3, and 4 are admitted.

b. The Defendant denies the allegations of Paragraph 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14.

AS A SECOND CAUSE OF ACTION: FAILURE TO PAY WAGES

2. The Defendant denies the allegations of Paragraph 16.

3. The Defendant admits the allegations of Paragraph 17.

4. The Defendant denies the allegation of Paragraph 18, 19, 20, 21, 22, 23, 24, 25, 26, 27,

28, and 29.

MOTION TO DISMISS

5. Pursuant to Rule 21, SCRCP, the Defendant Frank Eason moves for dismissal as he is not a proper party to this action.
6. The Defendant, Frank Eason has no legal or equitable interest in Rock City Heavy Hauling, Inc.
7. The Defendant, Frank Eason is not employed by Rock City Heavy Hauling, Inc, nor any of the co-Defendants.
8. The Defendant, Frank Eason was not involved in the oral agreement between any co-Defendants and the Plaintiff.
9. The Defendant, Frank Eason, is not authorized to hire employees or independent contractors, nor is he authorized to negotiate or provide compensation to any employees or independent contractors.
10. The Defendant, Frank Eason does is not authorized nor does he have access to any of the records, files or data of Rock City Heavy Hauling, Inc. regarding any scheduling of employees, jobs, payments, or payroll information.
11. As a result of the aforementioned, the Defendant, Frank Eason should be dismissed as a Defendant in this action as he was not involved nor does he have any legal or equitable interest in Rock City Heavy Hauling, Inc. which would subject him to any liability to the Plaintiff.

WHEREFORE, having fully answered, the Defendant seeks dismissal of the Plaintiff's complaint as well as dismissing him as a Defendant to this action and for such other relief as this

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Court deems just and proper.

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May 4 , 2018

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STATE OF SOUTH CAROLINA]	IN THE COURT OF COMMON PLEAS
COUNTY OF YORK]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,] Plaintiff,] v.]	REPLY TO AMENDED ANSWER AND COUNTERCLAIM
ROBERT WAYNE DUNCAN, Jr.,] ROBERT DUNCAN, Sr., and] FRANK EASON, d/b/a] "Rock City Heavy Hauling, Inc.",] Defendants.]	OF ROBERT DUNCAN, Jr. C.A. No. 2017-CP-46-02487

Plaintiff, replying to the Answer and Counterclaim of Defendant ROBERT WAYNE DUNCAN, Jr. herein, would respectfully show the following:

AS A FIRST DEFENSE AND REPLY

1. The Plaintiff reaffirms and reiterates all of the allegations contained in the Complaint and denies those allegations inconsistent therewith.

AS A SECOND DEFENSE AND REPLY:

To the First Cause of Action for Breach

2. All allegations stated or referenced elsewhere in this pleading and relevant to this defense are hereby realleged by this reference to them.
3. In response to the allegations of Paragraphs 10., 12. and 17. of DUNCAN, Jr.'s Amended Answer and Counterclaim, the Plaintiff would plead that at no point has he been paid the agreed price for the subject truck, and on knowledge and information, could therefore have no duty to turn over the title to the same to DUNCAN, Jr.
4. The Defendant DUNCAN, Jr. pleads, in the alternative and in the event the Court finds the parties' oral agreement invalid, for the return of funds paid by him for parts and for any increase in value of the subject truck. (Para. 21 of DUNCAN, Jr.'s Amended Answer and Counterclaim.)

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5. In the alternative to the requested relief in his Amended Complaint, and in the event the Court finds the parties' oral agreement invalid, the Plaintiff pleads for credit owed to him for the use of the subject truck while the same was in the Plaintiff's use and control.
6. In response to the allegations of Paragraph 22. of DUNCAN, Jr.'s Amended Answer and Counterclaim, the Plaintiff pleads that in South Carolina, as in other jurisdictions, attorneys' fees are ordinarily not recoverable by any party to an action unless:

   a) a statutory provision so allows: *See, e.g., Andrews* v. *Central Sur. Ins. Co.*, 271 F.Supp. 814 (D.S.C. 1967), *aff'd* 391 F.2d 935 (4th Cir. 1968); *Duke Power Co.* v. *S.C. Pub. Serv. Comm'n*, 284 S.C. 81, 326 S.E.2d 395 (1985); *Brown* v. *Spann*, 21 S.C.L. (3 Hill) 324 (1837);

   b) a contract between the parties expressly provides therefor: *See, Duke Power Co.* v. *S.C. Pub. Serv. Comm'n, supra;* or

   c) there is a right to fees established by Common Law precedent (*e.g.*, a common fund or the successful prosecution of a *Mandamus* action). *See*, 38 S.C. LAW REVIEW 865 (1987).

7. As to this cause of action, no statutory provision allows the recovery of attorney fees. There was no provision for such fees in the parties' agreement. No precedent exists under the Common Law allowing attorney's fees for the alleged failures of the Plaintiff.
8. The Defendant DUNCAN, Jr.'s pleading for attorney's fees is defective and the same must be stricken or amended.

<u>AS A THIRD DEFENSE AND REPLY:</u>

<u>To the Second Cause of Action for Fraud and</u>

<u>To the Third Cause of Action for Negligent Misrepresentation</u>

9. All allegations stated or referenced elsewhere in this pleading and relevant to this defense are hereby realleged by this reference to them.
10. The Plaintiff would affirmatively allege that the Defendant DUNCAN, Jr. was fully aware of the status of the subject truck as it related to an insurance claim by the Plaintiff, at and after the time of the parties's dealings as to that truck.

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11. The Plaintiff would further affirmatively allege that his dealings with the said insurance claim never presented, and does not present, any problem as to his ability to convey the said truck.
12. In response to the allegations of Paragraph 31. of DUNCAN, Jr.'s Amended Answer and Counterclaim, the Plaintiff realleges the facts and arguments above as to the unavailability of attorney's fees to the said Defendant.

/s/ John Martin Foster
Attorney for the Plaintiff

The Guardian Building
223 East Main Street, Suite 520
Rock Hill, South Carolina29730

Post Office Box 106
Rock Hill, South Carolina 29731-6106

(803) 324-8100
(803) 324-8109: Fax
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June 6, 2018

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2018 Jun 06 3:05 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA COUNTY OF YORK	]]	IN THE COURT OF COMMON PLEAS SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD, Plaintiff, v. ROBERT WAYNE DUNCAN, Jr., ROBERT DUNCAN, Sr., and FRANK EASON, d/b/a "Rock City Heavy Hauling, Inc.", Defendants.	]]]]]]]]]]]]	CERTIFICATE OF SERVICE C.A. No. 2017-CP-46-02487

The undersigned certifies that he has served the following pleadings or documents in the above-captioned and numbered civil action:

Reply to the Amended Answer and Counterclaim of DUNCAN, Jr.; and
This Certificate of Service

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out below; or

by hand delivering copies of the same to the following persons, or by leaving the same at that person's office with that person's clerk or some other person in charge thereof, or by leaving it in a conspicuous place therein; of if the office was closed or the person to be served has no office, by leaving a copy at that person's dwelling place or usual place of abode with some person of suitable age and discretion then residing therein, all pursuant to Rule 6(b), S.C.R.C.P.

Stephen D. Schusterman
P.O. Box 4211
Rock Hill, South Carolina 29731

/s/ John Martin Foster
Attorney for the Plaintiff
SC Bar No. 2086

223 East Main Street, Suite 520
Rock Hill, South Carolina 29730
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June 6, 2018

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2018 Jun 06 3:05 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA]	IN THE COURT OF COMMON PLEAS
COUNTY OF YORK]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,]	
Plaintiff,]	REPLY TO
v.]	AMENDED ANSWER AND COUNTERCLAIM
ROBERT WAYNE DUNCAN, Jr.,]	OF ROBERT DUNCAN, Sr.
ROBERT DUNCAN, Sr., and]	
FRANK EASON, d/b/a]	
"Rock City Heavy Hauling, Inc.",]	C.A. No. 2017-CP-46-02487
Defendants.]	

Plaintiff, replying to the Answer and Counterclaim of Defendant ROBERT DUNCAN, Sr. herein, would respectfully show the following:

AS A FIRST DEFENSE AND REPLY

1. The Plaintiff reaffirms and reiterates all of the allegations contained in the Complaint and denies those allegations inconsistent therewith.

AS A SECOND DEFENSE AND REPLY:

To the First Cause of Action for Breach

2. All allegations stated or referenced elsewhere in this pleading and relevant to this defense are hereby realleged by this reference to them.
3. In response to the allegations of Paragraphs 10., 12. and 17. of DUNCAN, Sr.'s Amended Answer and Counterclaim, the Plaintiff would plead that at no point has he been paid the agreed price for the subject truck, and on knowledge and information, could therefore have no duty to turn over the title to the same to DUNCAN, Sr..
4. The Defendant DUNCAN, Sr. pleads, in the alternative and in the event the Court finds the parties' oral agreement invalid, for the return of funds paid by him for parts and for any increase in value of the subject truck. (Para. 21 of DUNCAN, Sr.'s Amended Answer and Counterclaim.)

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5. In the alternative to the requested relief in his Amended Complaint, and in the event the Court finds the parties' oral agreement invalid, the Plaintiff pleads for credit owed to him for the use of the subject truck while the same was in the Plaintiff's use and control.
6. In response to the allegations of Paragraph 22. of DUNCAN, Sr.'s Amended Answer and Counterclaim, the Plaintiff pleads that in South Carolina, as in other jurisdictions, attorneys' fees are ordinarily not recoverable by any party to an action unless:

   a) a statutory provision so allows: *See, e.g., Andrews* v. *Central Sur. Ins. Co.*, 271 F.Supp. 814 (D.S.C. 1967), *aff'd* 391 F.2d 935 (4th Cir. 1968); *Duke Power Co.* v. *S.C. Pub. Serv. Comm'n*, 284 S.C. 81, 326 S.E.2d 395 (1985); *Brown* v. *Spann*, 21 S.C.L. (3 Hill) 324 (1837);

   b) a contract between the parties expressly provides therefor: *See, Duke Power Co.* v. *S.C. Pub. Serv. Comm'n, supra*; or

   c) there is a right to fees established by Common Law precedent (*e.g.*, a common fund or the successful prosecution of a *Mandamus* action). *See*, 38 S.C. LAW REVIEW 865 (1987).

7. As to this cause of action, no statutory provision allows the recovery of attorney fees. There was no provision for such fees in the parties' agreement. No precedent exists under the Common Law allowing attorney's fees for the alleged failures of the Plaintiff.
8. The Defendant DUNCAN, Sr.'s pleading for attorney's fees is defective and the same must be stricken or amended.

<u>AS A THIRD DEFENSE AND REPLY:</u>

<u>To the Second Cause of Action for Fraud and</u>

<u>To the Third Cause of Action for Negligent Misrepresentation</u>

9. All allegations stated or referenced elsewhere in this pleading and relevant to this defense are hereby realleged by this reference to them.
10. The Plaintiff would affirmatively allege that the Defendant DUNCAN, Sr. was fully aware of the status of the subject truck as it related to an insurance claim by the Plaintiff, at and after the time of the parties's dealings as to that truck.

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11. The Plaintiff would further affirmatively allege that his dealings with the said insurance claim never presented, and does not present, any problem as to his ability to convey the said truck.
12. In response to the allegations of Paragraph 31. of DUNCAN, Sr.'s Amended Answer and Counterclaim, the Plaintiff realleges the facts and arguments above as to the unavailability of attorney's fees to the said Defendant.

/s/ John Martin Foster
Attorney for the Plaintiff

The Guardian Building
223 East Main Street, Suite 520
Rock Hill, South Carolina29730

Post Office Box 106
Rock Hill, South Carolina 29731-6106

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June 6, 2018

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2018 Jun 06 3:05 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA COUNTY OF YORK	]]	IN THE COURT OF COMMON PLEAS SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD, Plaintiff, v. ROBERT WAYNE DUNCAN, Jr., ROBERT DUNCAN, Sr., and FRANK EASON, d/b/a "Rock City Heavy Hauling, Inc.", Defendants.	]]]]]]]]]]]]	CERTIFICATE OF SERVICE C.A. No. 2017-CP-46-02487

The undersigned certifies that he has served the following pleadings or documents in the above-captioned and numbered civil action:

Reply to the Amended Answer and Counterclaim of DUNCAN, Sr.; and
This Certificate of Service

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out below; or

by hand delivering copies of the same to the following persons, or by leaving the same at that person's office with that person's clerk or some other person in charge thereof, or by leaving it in a conspicuous place therein; of if the office was closed or the person to be served has no office, by leaving a copy at that person's dwelling place or usual place of abode with some person of suitable age and discretion then residing therein, all pursuant to Rule 6(b), S.C.R.C.P.

Stephen D. Schusterman
P.O. Box 4211
Rock Hill, South Carolina 29731

/s/ John Martin Foster
Attorney for the Plaintiff
SC Bar No. 2086

223 East Main Street, Suite 520
Rock Hill, South Carolina 29730
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June 6, 2018

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2018 Jun 06 3:05 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA]	IN THE COURT OF COMMON PLEAS
]	
COUNTY OF YORK]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,]	
]	
Plaintiff,]	NOTICE AND MOTION
v.]	
]	FOR ORDER COMPELLING DISCOVERY
ROBERT WAYNE DUNCAN, Jr.,]	
ROBERT DUNCAN, Sr., and]	AND FOR EXPENSES OF MOTION
FRANK EASON, d/b/a]	
"Rock City Heavy Hauling, Inc.",]	C.A. No. 2017-CP-46-02487
]	
Defendants.]	

To: Stephen D. Schusterman
Attorney for Defendants
541 East Main Street
P.O. Box 4211
Rock Hill, South Carolina 29732

You or your attorney should appear before this Court to present evidence or argument, if any you have, relating to the Motion herein, as follows:

DATE AND TIME: To be set by the Clerk of Court, or as soon thereafter as counsel may be heard.

PLACE: Historic County Courthouse
2 South Congress Street
York, South Carolina 29745,

or such as may be set by the Clerk of Court.

Pursuant to Rule 37(a), S.C.R.C.P., the Plaintiff MARK PAFFORD, by and through his attorney undersigned, moves this Court for an Order compelling the responses, and documents and/or things, referenced in his Request for Production of Documents and/or Things for Inspection and Copying June 7, 2018 and served by mail on the Defendants named above and their Counsel on the same date. Copies of the said Request for Production, of the Defendants' response, and of correspondence between the parties, are attached and incorporated.

Pursuant to Rule 37(a)(4), the Plaintiff MARK PAFFORD, by and through his attorney

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

undersigned, moves this Court for an Order requiring the Defendants, whose conduct necessitated this Motion, to pay to the Plaintiff as the moving party, those reasonable expenses incurred in obtaining the order, including attorney's fees.

Pursuant to Rule 11, S.C.R.C.P., counsel for the Movant hereby certifies that prior to filing this Motion, he has communicated, orally or in writing, with opposing counsel and has attempted in good faith to resolve the matter contained in this Motion.

This Motion is based upon the above-cited Rules, the records of this Case, and the attached Affidavit(s) of the Movant(s) and their affiant(s), and any attachments, all of which are hereby incorporated in this Motion.

/s/ John Martin Foster
Attorney for Plaintiff
SC Bar No. 2086

223 East Main Street, Suite 520
Rock Hill, S.C. 29730

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803 324-8100
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February 11, 2019

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA	]	IN THE COURT OF COMMON PLEAS
	]	
COUNTY OF YORK	]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,	]	
	]	REQUEST FOR PRODUCTION
Plaintiff,	]	
v.	]	OF DOCUMENTS AND/OR THINGS
	]	
ROBERT WAYNE DUNCAN, Jr.,	]	FOR INSPECTION AND COPYING
ROBERT DUNCAN, Sr., and	]	
FRANK EASON, d/b/a	]	
"Rock City Heavy Hauling, Inc.",	]	C.A. No. 2017-CP-46-02487
	]	
Defendants.	]	

To: Stephen D. Schusterman
Attorney for Defendants
541 East Main Street
P.O. Box 4211
Rock Hill, South Carolina 29732

YOU (hereafter also "the Responding Parties") ARE HEREBY REQUESTED, pursuant to Rule 34(a), S.C.R.C.P.:

To produce and permit the party making this Request (hereafter also "the Requesting Party"), or someone acting on that party's behalf, to inspect and copy the following designated documents (as defined herein below),

OR

To produce and permit the party making this Request to inspect and copy, test, or sample the following described tangible thing which constitutes or contains matters within the scope of Rule 26(b), S.C.R.C.P., and which are in your possession, custody or control.

DIRECTIONS

A. Place for Production. The said documents and/or things shall be made available to the above-named respondent, at the office and address of attorney for the respondent, undersigned.

B. Identification of respondent. Identify each person responding to each request, including the length of time the respondent has held his/her position with the respondent, his, her or its agent, servant or employee, and the duties performed for the said respondent, his, her or its agent, servant or employee. If more than one person responds or participates in the preparation

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of the response to a request, each person responding or participating in preparation of the answers to each shall be similarly identified. The person under whose control or supervision these responses are prepared, shall be similarly identified.

C. Accompanying information. For each such request the following further information shall be given:

i. The type of document (*e.g.*, installment contract, letter, etc.);
ii. The date the document bears;
iii. The date on which the document was prepared;
iv. The identity of the person(s) who prepared the document;
v. The identity of each signatory to the document;
vi. The person(s) for whom the document was prepared, and each recipient;
vii. The title of the document, or some other means of identifying it;
viii. The present location of the document and its present custodian;
ix. If the original document has been destroyed, the date and reason for or circumstances under which it was destroyed;
x. The administrative unit of the respondent, his, her or its agent, servant or employee, which maintains the documents provided;
xi. The date on which the response was prepared;
xii. A designation of which documents are provided in answer to that request. You may wish to number each document so that you can refer to it by number;
xiii. Where an individual request calls for a response which involves more than one part, a document provided in answer to each part of the request should be clearly designated so that it is clear to which part of the request it is provided.

D. Legibility and clarity of documents requested. In order to minimize duplication of time and effort in the discovery process, it is specifically requested that each and every document in response to the requests be proofread by a reasonable employee of the respondent to ensure that all text, figures, etc. on copies are clearly legible and that all abbreviations and any symbols are intelligible to any person who may have occasion to read the responding documents.

E. Sources of information for response. You shall respond to each request from all sources and all information in the respondent's possession or otherwise available from the respondent's information from his, her or its officers, employees, servants, agents, representatives, attorneys, investigators, or consultants and information which is known by each of them.

F. Inability to provide document(s). If you cannot provide any or all of the documents requested, after exercising due diligence to do so, provide any documents available and state your inability to provide the documents or the remainder of them (including a list of sources which were consulted for a response), and state whatever information or knowledge you have concerning the present location of the document(s) and the identity of its present custodian.

G. Continuing status of request. Each document request is considered continuing, and if respondent obtains further or different information, directly or indirectly, from the time the answers are served until the time of trial, which renders its response to one of them incomplete or inaccurate, respondent is obligated to serve amended responses on the undersigned.

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H. Clarification of requests. If respondent feels that any of the document requests is unclear or ambiguous in any way, it should notify the attorney for the requesting party so that the item(s) may be properly clarified prior to production of the documents.

I. Claim of privilege, work-product or confidentiality. If any document which is required to be produced is claimed to be privileged or to constitute work-product or to be otherwise confidential, state the grounds upon which such privilege, work-product or confidentiality is being asserted, and include a brief description of the document, identifying its author and persons receiving copies thereof.

J. Protection of Documents or Things to be Inspected. If the original document(s) are produced and delivered to the requesting party, the said document(s) to be inspected and photographed (or xerographed) will be duly safeguarded and returned to you with reasonable dispatch on completion of the duplication process, and without harm to the originals.

K. Time for Production. Service of a written response to this Request is due from you, in accordance with the provisions of the above-referenced Rule, within 30 days of the date of service of this request.

DEFINITIONS

For the purposes of these requests, the following definitions apply:

A. The terms "document" or "documents" shall refer to all writings and recorded materials, of any kind, that are or have been in the possession, control or custody of the respondent of which the respondent has knowledge, whether originals or copies. Such writings or recordings include but are not limited to:

> advertisements, agreements, applications, appraisals, bank statements, bills of sale, books, bulletins, charts, circulars, computer print-outs or discs or tapes, computer programs, confirmations, contracts, correspondence, desk calendars, diagrams, diaries, documents, drawings or other visual materials, file memoranda, files, forecasts, forms, graphs, intra- or inter-office memoranda, journals or other books of account, ledgers, letters, lists, logs, manuals, minutes, note-books, notes, opinions or reports of consultants, orders, pamphlets, papers, periodicals, photographs or microfilm, plans, promissory notes, records, reports and/or summaries of interviews or conversations, reports and/or summaries of investigations, reports, research material, rough drafts, statements or expressions of policy, statistical computations, studies, tax invoices, telegrams, transcripts, voice or phono-records, working papers,
>
> and other data compilations from which information may be obtained, of all natures and kinds whether handwritten, typed, printed, mimeographed, xerographed, photocopied or other matter are written, printed or recorded. If any document(s) asked to be produced, identified, attached or described is not in your possession or subject to your control, give the reason therefor and its present location and the identity of the present custodian of the document and of any copy of summary thereof.

B. "Person" shall mean any natural person, group of natural persons acting in a collegial capacity (*e.g.*, a committee or board of directors), corporation, partnership, association,

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joint venture, labor union, and any other incorporated or unincorporated business, governmental, public or social entity.

C. "Communication" shall mean any or all transmittals of information, whether oral or reduced to writing, whether hand-written, type-written, tape-recorded, or produced by electronic data processing, irrespective of how conveyed (*e.g.*, telephone, telegraph, United States mail, foreign mail, private mail or courier service, facsimile or "fax" transmittal, face-to-face contact), including but not limited to: inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, notes, telegrams, advertisements, or other forms of verbal intercourse, whether oral or written.

D. "Relating to" or "regarding" shall mean relating to, regarding, consisting of, referring to, reflecting, manifesting, prepared in connection with, describing, containing, attesting to, or being in any way legally, logically, or factually connected with the matter discussed, whether directly or indirectly.

E. When requested to "identify" or provide information as to the "identity" of a person, state his/her full name, occupation, position, business relationship to respondent, currently or at the relevant period, and current or last known home and work addresses and telephone numbers, current or last known employment address, and social security number.

F. The "relevant period" shall mean the period from January 1st, 2016 to date.

G. When used without qualification, "the transaction" or "the subject transaction" means the oral agreement whereby PAFFORD would sell to one or more of the Responding Parties a used 2003 Kenworth W 3900 red truck, VIN # 1XKWDB9X03J392961 (hereafter "the subject truck").

H. When used without qualification, "equipment" includes the subject truck and any other vehicle owned, used or operated by any of the Responding Parties or by "Rock City Heavy Hauling, Inc."

DOCUMENTS REQUESTED

1. Any and all documents regarding the subject transaction and/or regarding any subsequent actions or events regarding the subject matter of the transaction.
2. Any and all documents regarding correspondence and communications between the parties, or any of them.
3. Any and all documents referenced in the answers of the Responding Parties to those Interrogatories dated and filed contemporaneously herewith.
4. Any and all photographs, diagrams, sketches, plats or other prepared documents of any kind whatsoever relating to this civil action.
5. Any and all documents obtained pursuant to any *Subpoena* issued by the Requesting Party in

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this civil action.

6. Any documents setting forth or referencing the maintenance or repair of the subject truck by any persons or entities.
7. Any insurance policies providing liability coverage relating to the Counterclaim or defense of any Responding Party.
8. Any documents setting forth or referencing the opinion, investigation or conclusion of any expert witnesses whom you, as the Responding Parties, propose to use as a witness at the time of the trial of the case.
9. Any documents relating to the title of the subject truck.
10. Any documents relating to the dealings of the Plaintiff MARK GILES PAFFORD with any insurance carrier and as to the subject truck.
11. Any documents setting forth the legal name and type of business organization of the company designated as "Rock Hill Heavy Hauling, Inc." or listing any owners, stockholders, managers, partners or investors therein.
12. The personal and business, State and Federal, Income Tax Returns of any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." for the years 2016 and 2017.
13. Any documents regarding the assets of any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." utilized in connection with any loans obtained by any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." during the relevant period.
14. Any documents relating to the employment of MARK GILES PAFFORD by, and/or his use of any equipment, including any mileage relating to any trips undertaken by the Plaintiff, the times of such trips, and any expenses incurred by the Responding Parties relating to such employment.
15. Any mileage books used or maintained by the Responding Parties, or any of them, or "Rock City Heavy Hauling, Inc.", and relating to any equipment.
16. Any documents relating to any criminal complaints made by or on behalf of the Responding Parties, or any of them, as to MARK GILES PAFFORD.
17. Any documents relating to any involvement of the York County Sheriff's Department with any of the Responding Party and MARK GILES PAFFORD.
18. Any documents relating to the mileage or use of the subject truck.
19. Any documents relating to any surveillance of MARK GILES PAFFORD or of the subject truck.
20. Any documents relating to the use of any equipment belonging to the Responding Parties, or

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

any of them, by the Defendant FRANK EASON.

21. Any documents relating to the use of any equipment or vehicles owned by or titled to the Defendant FRANK EASON.

22. Any documents relating to the payment of any funds to the Defendant FRANK EASON by any of the Responding Parties during the relevant period.

John Martin Foster
Attorney for Plaintiff
SC Bar No. 2086

The Guardian Building
223 East Main Street, Suite 520
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June 7, 2018

Rock Hill, South Carolina

/home/jmfoster/Documents/Pafford/ReqProdPafford.odt

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA COUNTY OF YORK	]]	IN THE COURT OF COMMON PLEAS SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD, Plaintiff, v. ROBERT WAYNE DUNCAN, Jr., ROBERT DUNCAN, Sr., and FRANK EASON, d/b/a "Rock City Heavy Hauling, Inc.", Defendants.	]]]]]]]]]]]]	CERTIFICATE OF SERVICE C.A. No. 2017-CP-46-02487

The undersigned counsel herein certifies that, pursuant to Rule 5(b)(1), S.C.R.C.P, on June 7, 2018 he served copies of the following pleadings, documents or papers in the above-captioned and numbered civil action:

Plaintiff's Interrogatories to Defendants, dated June 7, 2018;
Plaintiff's Requests for Production to Defendants, dated June 7, 2018; and
This Certificate of Service.

the original of which Certificate was sent on the same date to be filed with the Clerk of the Court for the Court named above,

by depositing the same with the United States Postal Service on the date above, with sufficient postage affixed and directed to the respective last known address(es) of those attorney(s) and/or persons set out below; or

by hand delivering copies of the same to the following persons, or by leaving the same at that person's office with that person's clerk or some other person in charge thereof, or by leaving it or them in a conspicuous place therein; of if the office was closed or the person to be served has no office, by leaving a copy or copies at that person's dwelling place or usual place of abode with some person of suitable age and discretion then residing therein:

Stephen D. Schusterman
P.O. Box 4211
Rock Hill, South Carolina 29732

John Martin Foster
Attorney for Plaintiff
SC Bar No. 2086
Post Office Box 106
Rock Hill, SC 29731-6106
803-324-8100
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June 7, 2018

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA COUNTY OF YORK	)	IN THE COURT OF COMMON PLEAS SIXTEENTH JUDICIAL CIRCUIT
Mark Giles Pafford Plaintiff	)	Case No: 2017 CP 46-2487
vs.	)	**DEFENDANTS RESPONSE TO PLAINTIFFS REQUEST TO PRODUCE**
Robert Dwayne Duncan, Jr. Robert Wayne Duncan, Sr. and Frank Eason d/b/a "Rock City Heavy Hauling, Inc." Defendants.	)	

The Defendants, by and through their attorney, Stephen D. Schusterman hereby responds to Plaintiff's Requests to Produce as follows:

1. Any and all documents regarding the subject transactions and/or regarding any subsequent actions or events regarding the subject matter of the transaction.

   RESPONSE: See response to Request to Produce #3.

2. Any and all documents regarding correspondence and communications between the parties or any of them.

   RESPONSE: See attached.

3. Any and all documents referenced in the answers of the Responding Parties to those Interrogatories dated and filed contemporaneously herewith.

   RESPONSE: See attached

4. Any and all photographs, diagrams, sketches, plats or other prepared documents of any kind whatsoever relating to this civil action.

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RESPONSE: None.

5. Any and all documents obtained pursuant to any *Subpoena* issued by the Requesting Party in this civil action.

   RESPONSE: None.

6. Any documents setting forth or referencing the maintenance or repair of the subject truck by any persons or entities.

   RESPONSE: Defendant is attempting to locate receipts and/or invoices. There were repairs to 3 vehicles as part of the monies due on purchase.

7. Any insurance policies providing liability coverage relating to the Counterclaim or defense any Responding Party.

   RESPONSE: None

8. Any documents setting forth or referring the opinion, investigation or conclusion of any expert witnesses whom you, as the Responding Parties, propose to use as a witness at the time of the trial of the case.

   RESPONSE: None

9. Any documents relating to the title of the subject truck.

   RESPONSE: See attached.

10. Any documents relating to the dealings of the Plaintiff MARK GILES PAFFORD with any insurance carrier and as to the subject truck.

    RESPONSE: The Defendants do not have any documents in their possession.

11. Any documents setting forth the legal names and type of business organization of the company designated as "Rock Hill Heavy Hauling, Inc." or listing any owners, stockholders, managers, partners or investors therein.

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

RESPONSE: The Defendants do not have any documents in their possession. All records regarding the legal entity is on file with the South Carolina Secretary of State.

12. The personal and business, State and Federal Income Tax Returns of any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." for the years 2016 and 2017.

RESPONSE: Robert Duncan, Jr. – Tax returns have been prepared but they have not been release d by Yarborough, Certified Public Accountant, therefore Duncan, Jr. does not have possession of them nor access to them.

Rock City Heavy Haul, Inc,2016/2017 tax returns not filed.

Robert Duncan, Sr. 2016 Federal Return attached

Eason, 2017 Federal Return attached

13. Any documents regarding the assets of any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." utilized in connection with any loans obtained by any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." during the relevant period.

RESPONSE: None

14. Any documents relating to the employment of MARK GILES PAFFORD by, and/or his use of any equipment, including any mileage relating to any trips undertaken by the Plaintiff, the time of such trips and any expenses incurred by the Responding Parties relating to such employment.

RESPONSE: See documents attached to Response to Request to Produce #3.

15. Any mileage books used or maintained by the Responding Parties, or any of them,

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

or "Rock City Heavy Hauling, Inc. and relating to any equipment.

RESPONSE: None

16. Any documents relating to any criminal complaints made by or on behalf of the Responding Parties, or any of them, as to MARK GILES PAFFORD.

RESPONSE: Defendants do not have possession of any documents; any and all documents relating to this request are in the possession of the York County Sheriff Office.

17. Any documents relating to any involvement of the York County Sheriff's Department with any of the Responding Party and MARK GILES PAFFORD.

RESPONSE: See attached documents; any other documents are in the possession of the York County Sheriff Office.

18. Any documents relating to the mileage of use of the subject truck.

RESPONSE: None

19. Any document relating to any surveillance of MARK GILES PAFFORD or of the subject truck.

RESPONSE: The Defendant does not have any documents in his possession; however the Defendant does have two videos relating to surveillance of the Plaintiff

20. Any documents relating to the use of any equipment belonging to the Responding Parties, or any of them, by the Defendant FRANK EASON.

RESPONSE: None.

21. Any documents relating to the use of any equipment or vehicles owned by or titled to the Defendant FRANK EASON.

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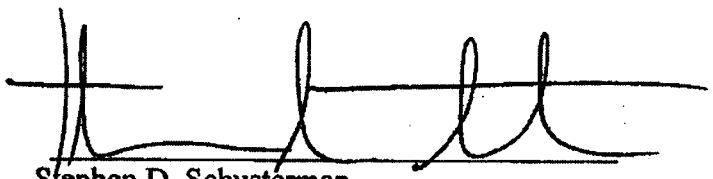
RESPONSE: There are no documents in Defendants possession; however it was a 2003 Kenworth leased by Duncan from Eason and purchased it. There was a lease agreement in existence however Defendant is unable to locate.

22. Any documents relating to the payment of any funds to the Defendant FRANK EASON by any of the Responding Parties during the relevant period.

RESPONSE: The Responding Parties have not paid any funds to Frank Eason.



Stephen D. Schusterman
SCHUSTERMAN LAW FIRM, PA
P.O. Box 4211
Rock Hill, South Carolina 29732
Telephone: 803-325-7788

ATTORNEY FOR DEFENDANTS

August 10, 2018

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RESPONSE TO REQUEST TO PRODUCE #2

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2003 Ford 900 Truck
1-1998 Trailking HD 70
1 2004 Trailking HD 90
1 Axle 1 Wheel Dump
1 2004 50K Dol

85,000.00
10,000.00
95,000.00
- 14,000.00 20% Down
81,000.00
5,000.00
- 10,000.00
66,000.00

6-15-15
8 6 15

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ROCK CITY HEAVY HAUL INC.

DRIVER

TRACTOR/TRAILER REPAIR WORK ORDER

DATE _____

DRIVER _____

TRACTOR# _____ TRAILER# _____

MILEAGE _____

1. _____

2. _____

3. _____

DRIVER CHECK _____

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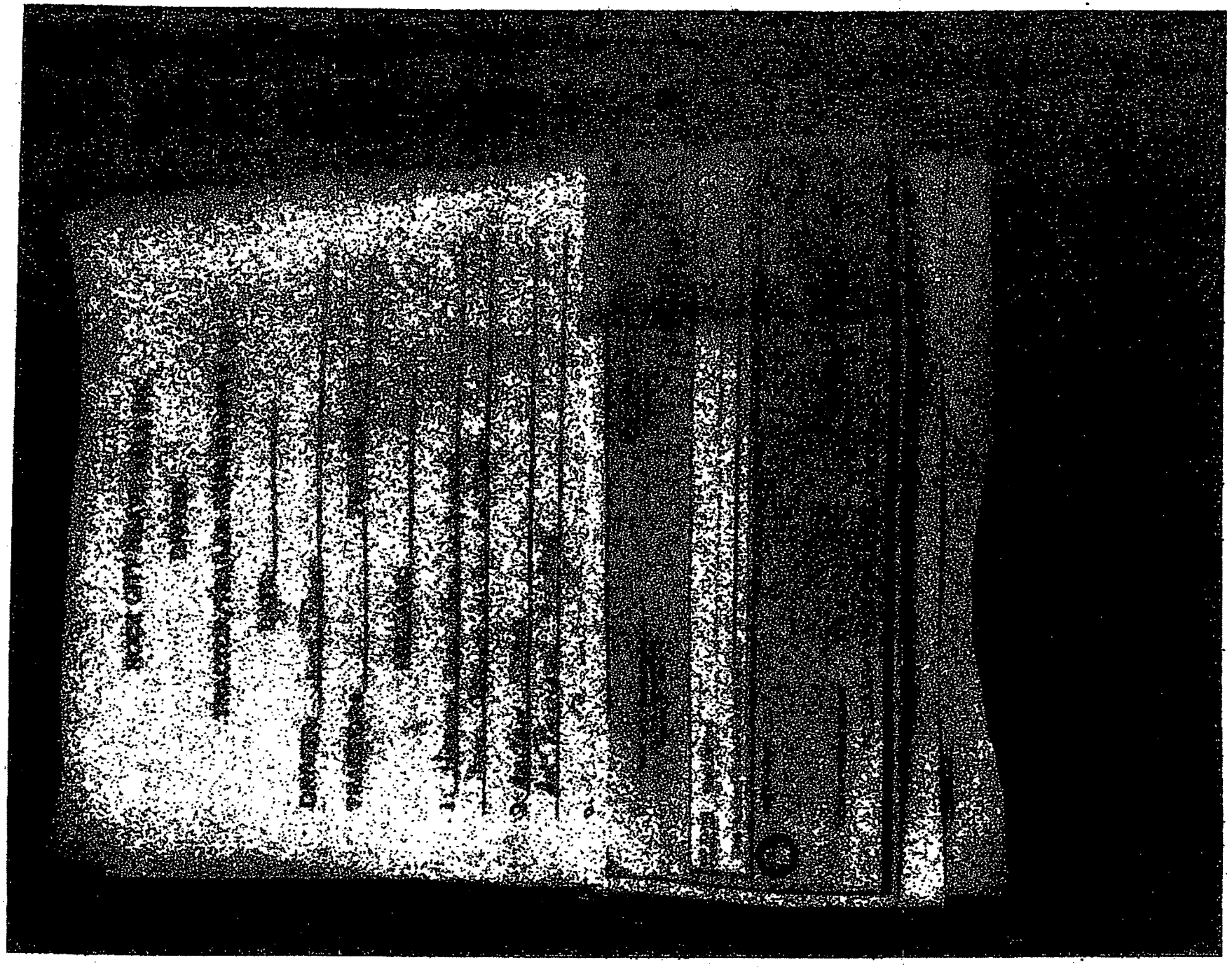

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RESPONSE TO REQUEST TO PRODUCE #3

2003 Ford F-150 Truck
1-1994 Trailking HD 70
1-2004 Trailking HD 90
1 Auto 1 HP Separate Dec
1 2004 Sor Dol

85,000.00
10,000.00
95,000.00
- 14,000.00
81,000.00
5,000.00
- 15,000.00
66,000.00

Sort Dol

6-15-15
8 6 15

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

DATE	CHECK #	AMOUNT
4/21/2015	29697	2000.00
5/1/2015	29729	2000.00
5/21/2015	29780	2000.00
5/29/2015	29803	1000.00
6/16/2015	29835	7000.00
6/29/2015	EFS	2500.00
7/14/2015	CASH	3000.00
7/16/2015	EFS	1000.00
7/28/2015	EFS	2000.00
8/6/2015	29946	10000.00
9/21/2015	30031	1000.00
10/19/2015	30081	5000.00
11/19/2015	30109	2000.00
12/22/2015	30161	5000.00
2/19/2016	30251	3000.00
3/4/2016	30265	3000.00
3/24/2016	30301	5000.00
4/22/2016	30356	3000.00
6/20/2016	30421	5000.00
7/10/2016	CASH	3000.00
7/12/2016	30440	3000.00
7/27/2017	1082	5000.00
9/23/2015	EFS	4000.00
5/10/2016	1018	20000.00
8/23/2016	30472	4000.00
9/16/2016	CASH	10000.00
9/16/2016	30491	3000.00
10/10/2016	30507	3000.00
10/27/2016	1162	2000.00
12/2/2016	30551	4000.00
12/27/2016	30572	4000.00
1/31/2017	1348	4000.00
2/23/2017	1301	3000.00
2/27/2017	EFS	2000.00
4/11/2017	30610	4000.00
4/27/2017	30614	4000.00
6/30/2017	CASH	5000.00
2005 PETERBILT	INVOICE	8000.00
		159500.00
TOTAL PAYROLL	96 WEEKS $1000 PER WEEK	96000.00
OTHER EXPENSE		2245.00
TOTAL PAYROLL		96000.00 PD
PAID ON EQUIPMENT INVOICE		2245.00
PAID ON EQUIPMENT CASH		63500.00
PAID ON EQUIPMENT THUNDERBIRD		14000.00
TOTAL PAID ON EQUIPMENT		79745.00

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

View Check: #030610 Amount: $4,000.00 Date: 4/13/2017 Print Check

Check Front

CAUTION: VIEW CHECK FOR SECURITY FEATURES LISTED ON BACK INDICATING ALTERED OR COPIED

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
87-7985/2532

30610

4/11/2017

PAY TO THE ORDER OF Mark Pafford $ **4,000.00

Four Thousand and 00/100********** DOLLARS

A PROTECTED AGAINST FRAUD A

Mark Pafford

MEMO

Robert W Duncan

⑈030610⑈ ⑆253279659⑆310000008353 2⑈

Details on Back. Security Check

Check Back

ENDORSE HERE

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

ORIGINAL DOCUMENT

As the issuer, this CheckLock™ Secure Plus check may help reduce your risk of fraud and liability.

To learn how to protect your business, call our check fraud experts at 1-800-548-0289 or visit: www.intuitmarketplace.com/fraudcenter

REPLICATING, FORGING OR ALTERING THIS CHECK IS EXTREMELY DIFFICULT DUE TO CheckLock™ HIGH SECURITY FEATURES

SECURITY FEATURES:
Multi-Colored Prismatic Background
CheckLock™ Watermark
Heat Sensitive Ink
Security Binder or Microprint Lines
Chemically Sensitive Paper
Fugitive Ink on Back
Toner Adhesion
Protected Against Fraud Area
Visible Fibers
Invisible Fibers
VOID Indication
Security Weave® on Backer

DO NOT CASH IF:
- Pattern background of check does not vary in color from edge to edge
- Word "CheckLock™" is not visible in paper when held to light
- Pink toner does not fade & reappear when rubbed or scratched on
- "INTUIT CHECKLOCK™ SECURITY SYSTEM" not visible with magnification
- Stains or spots appear on front or back
- Ink on back looks pink or has disappeared
- Protect 22132 information appears tampered with
- Pink discoloration appears in Protected Area
- Fraud Risk and/or counterfeit Security Document: scratches and/or chemical signs of tamper damage
- Raised fibers are not visible
- White or blue fibers are not visible under ultraviolet light
- "VOID" appears clearly in red left of this message
- "ORIGINAL DOCUMENT" cannot be read

Listed and not listed check security features exceed industry standards.

Patented and patent pending security features that make this check tamper resistant. © Patented design is a certification mark of Check Payment Systems Association.

9-16-2016

Rock City Heavy Haul
154 N Anderson Road
Rock Hill SC 29745
803-324-4125

RE: Payment received

I, Mark Pafford, have received the amount of $ 10,000.00 from Rock City Heavy Haul today as a purchase toward equipment for Rock City Heavy Haul.

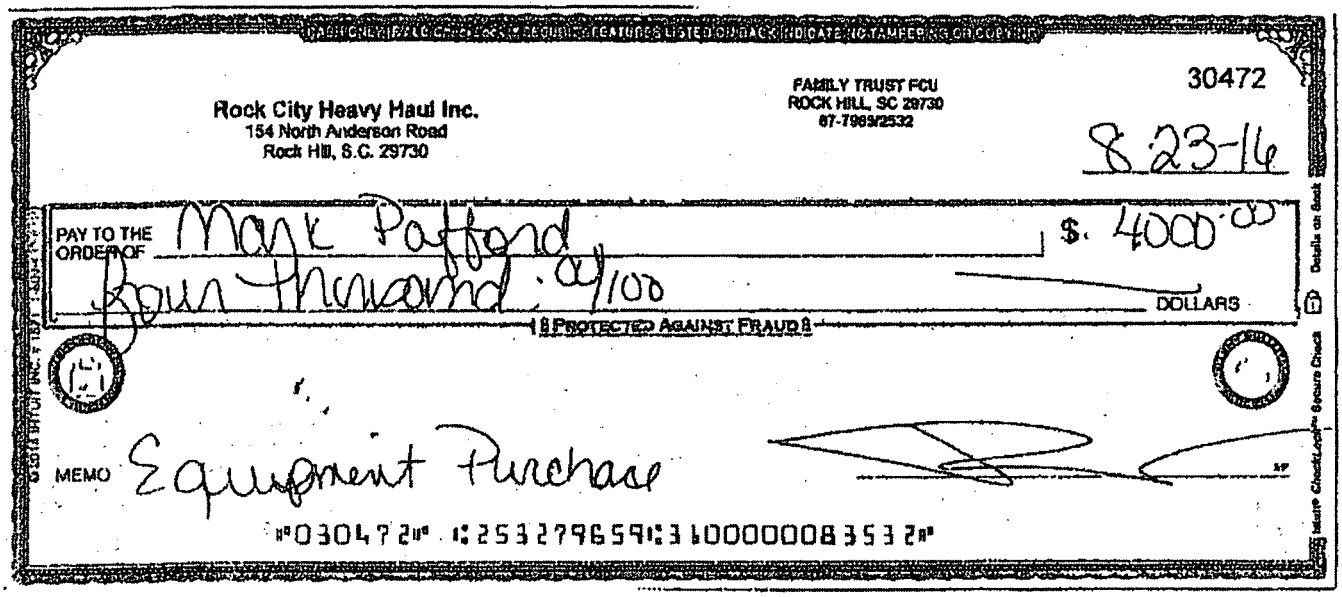
Signed MP

Date 9-16-16

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

View Check: #030472 Amount: $4,000.00 Date: 8/23/2016 Print Check

Check Front



Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
87-7989/2532

30472

8-23-16

PAY TO THE ORDER OF Mark Patford $ 4000.00

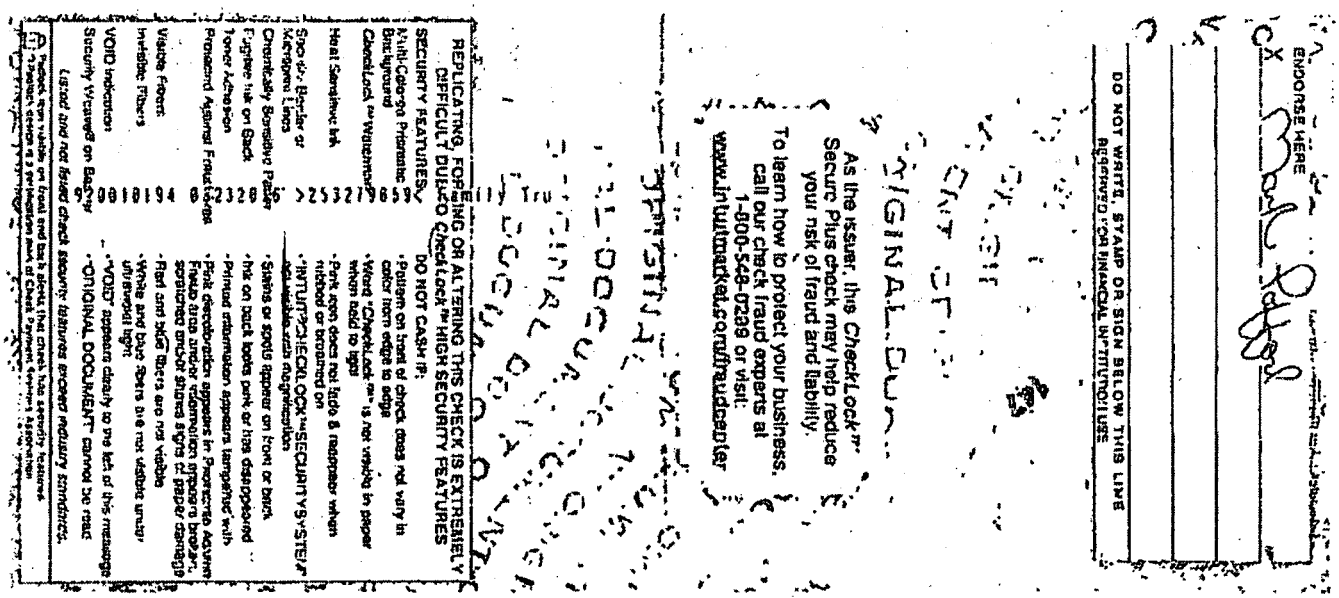
Four Thousand 00/100 DOLLARS

PROTECTED AGAINST FRAUD

MEMO Equipment Purchase

⑈030472⑈ ⑆253279659⑆ 3100000083532⑈

Back Scan



ENDORSE HERE

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
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ORIGINAL DOCUMENT

As the issuer, this CheckLock™ Secure Plus check may help reduce your risk of fraud and liability.

To learn how to protect your business, call our check fraud experts at 1-800-548-0289 or visit www.intuitmarket.com/fraudcenter

REPLICATING, FORGING OR ALTERING THIS CHECK IS EXTREMELY DIFFICULT DUE TO CheckLock™ HIGH SECURITY FEATURES

SECURITY FEATURES:
Multi-Colored Prismatic Background
CheckLock™ Watermark
Heat Sensitive Ink
Stop-to-Border or Kerogram Lines
Chemically Sensitive Paper
Fugitive Ink on Back
Toner Adhesion
Protected Against Fraud Laws

DO NOT CASH IF:
- Pattern on front of check does not vary in color from edge to edge
- Word "CheckLock™" is not visible in paper when held to light
- Pen will does not fade & reappear when ribbed or brushed on
- "INTUIT®CHECKLOCK™SECURITY SYSTEM" is visible with magnification
- Stains or spots appear on front or back
- Ink on back looks pink or has disappeared
- Printed information appears lamplighted with
- Pink discoloration appears in Protected Area
- Fields and/or information appears broken, scratched and/or shows signs of paper damage
- Red and blue fibers are not visible
- White and blue fibers are not visible under UV special light
- "VOID" appears clearly to the left of this message
- "ORIGINAL DOCUMENT" cannot be read

Security Watermark on Back

Listed and not listed check security features protect industry standards.

⑆ 0010194 0 ⑆232086⑆ >253279659<

ROBERT W DUNCAN
DBA ROCK CITY TRUCK
5300 BLUE BIRD LN
YORK, SC 29745-9608

1018

67-776/532 0875
3984118848

DATE 5-12-16

PAY TO THE ORDER OF Mark Pafford $ 20,000

Twenty Thousand +NO/100 DOLLARS

Wells Fargo Bank, N.A.
South Carolina
wellsfargo.com

FOR Purchase Truck

⑈0000001018⑈ ⑆053207766⑆ 3984118848⑈

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EFS electronic funds source

HOME ACTIONS.. REPORTS.. VIRTUAL MASTERCARD.. LINKS..

Electronic Cash Retrieval

Processing Please Wait. This may take a few minutes.
PLEASE DO NOT HIT THE BACK OR REFRESH BUTTON.

ECR Confirmation

(Issuer)Account Number	140672
Branch Number	000099
Transaction Number	4028589-000
** MoneyCode	140672 4028589 000** Give This Number To Driver
** Transaction Amount:	1000.00
Unit Number	52
Payee	mark pafford
Explanation	
Waybill #	
Product	Cash Advance
Repair Order	
General Ledger	

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

EFS electronic funds source

HOME ACTIONS.. REPORTS.. VIRTUAL MASTERCARD.. LINKS..

Electronic Cash Retrieval

Processing Please Wait. This may take a few minutes.

PLEASE DO NOT HIT THE BACK OR REFRESH BUTTON.

ECR Confirmation

(Issuer)Account Number	140672
Branch Number	000099
Transaction Number	3920958-000
** MoneyCode	140672 3920958 000** Give This Number To Driver
** Transaction Amount:	1500.00
Unit Number	52
Payee	mark pafford
Explanation	
Waybill #	
Product	Cash Advance
Repair Order	
General Ledger	

4000.00

EFS electronic funds source

HOME ACTIONS.. REPORTS.. VIRTUAL MASTERCARD.. LINKS..

Electronic Cash Retrieval

Processing Please Wait. This may take a few minutes.

PLEASE DO NOT HIT THE BACK OR REFRESH BUTTON.

ECR Confirmation

(Issuer)Account Number	140672
Branch Number	000099
Transaction Number	3885081-000
** MoneyCode	140672 3885081 000** Give This Number To Driver
** Transaction Amount:	1500.00
Unit Number	52
Payee	mark pafford
Explanation	
Waybill #	
Product	Cash Advance
Repair Order	
General Ledger	

Replacement Checks

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Ogden, UT 84403

DATE

PAY TO THE ORDER OF Mark Pafford

One thousand five hundred.00 U.S. DOLLARS $ 1500.00

DRIVER'S LICENSE

MONEYCODE 140672 3885081-000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE 149303

VALID FOR 30 DAYS AFTER AUTHORIZATION

This draft is not valid and will not be honored without obtaining an authorization code from EFS. To authorize, key the MoneyCode into the POS terminal or go to:

www.efsllc.com

tel: 801-624-4690 tel: 800-405-560

Draft only honored with valid authorization code and when properly completed and identification verified prior to cashi

⑈83749332⑈ ⑆053101561⑆ 801801413⑈

EFS

CHECK NUMBER 83749331

DATE 9-29-15

Mark Pafford

One thousand five hundred.00 U.S. DOLLARS $ 1500.00

DRIVER'S LICENSE

MONEYCODE 140672 3920958 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE 149125

This draft is not valid and will not be honored without obtai an authorization code from EFS. To authorize, key the MoneyCode into the POS terminal or go to:

www.efsllc.com

tel: 801-624-4690 tel: 800-405-56

Draft only honored with valid authorization code and wh properly completed and identification verified prior to cas

⑈83749331⑈ ⑆053101561⑆ 801801413⑈

EFS

CHECK NUMBER 83749330

DATE 9-28-15

Mark Pafford

One thousand - 00 / 100 U.S. DOLLARS $ 1000.00

DRIVER'S LICENSE

MONEYCODE 140672 4028589 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE 148591

This draft is not valid and will not be honored without ob an authorization code from EFS. To authorize, key t MoneyCode into the POS terminal or go to

www.efsllc.com

tel: 801-624-4690 tel: 800-405-5

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⑈83749330⑈ ⑆053101561⑆ 801801413⑈

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

PAY TO THE ORDER OF Mark Pafford

One thousand five hundred.00 — U.S. DOLLARS $ 1500.00

DRIVER'S LICENSE

MONEYCODE 140672 3885081-000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE 149303

This draft is not valid and will not be honored without obtaining an authorization code from EFS. To authorize, key the MoneyCode into the POS terminal or go to:

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tel: 801-624-4690 tel: 800-405-560

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⑈83749326⑈ ⑆053101561⑆ 801801413 7⑈

EFS

1104 County Plaza Dr. Suite 400
Ogden, UT 84403

CHECK NUMBER 83749331

DATE 9-29-15

PAY TO THE ORDER OF Mark Pafford

One thousand five hundred.00 — DOLLARS $ 1500.00

DRIVER'S LICENSE

MONEYCODE 140672 3920958 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE 149125

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⑈83749327⑈ ⑆053101561⑆ 801801413 7⑈

EFS

CHECK NUMBER 83749330

DATE 9-28-15

PAY TO THE ORDER OF Mark Pafford

One thousand.00/100 — U.S. DOLLARS $ 1000.00

DRIVER'S LICENSE

MONEYCODE 140672 4028589 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE 148591

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⑈83749330⑈ ⑆053101561⑆ 801801413 7⑈

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CHECK NUMBER 837493668

DATE 9-23-15

Mark Paffond

One Thousand Five Hundred U.S. DOLLARS $ 1500.00

DRIVER'S LICENSE Number State

MONEYCODE 140672 3541009 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE

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tel: 801-624-4690 tel: 800-405-5601

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Payable through WFB, N.A.
Chapel Hill, NC
Issued by Electronic Funds Source LLC

VALID FOR 30 DAYS AFTER AUTHORIZATION

⑈837493668⑈ ⑆053101561⑆ 8018014437⑈

CHECK NUMBER 837493659

DATE 9-23-15

1104 Country Hills Dr., Suite 600
Ogden, UT 84403

Mark Paffond

One Thousand Five Hundred U.S. DOLLARS $ 1500.00

DRIVER'S LICENSE Number State

MONEYCODE 140672 3541009 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE

This draft is not valid and will not be honored without obtaining an authorization code from EFS. To authorize, key the MoneyCode into the POS terminal or go to:

www.efsllc.com

tel: 801-624-4690 tel: 800-405-5601

Draft only honored with valid authorization code and when properly completed and identification verified prior to cashing.

Payable through WFB, N.A.
Chapel Hill, NC
Issued by Electronic Funds Source LLC

VALID FOR 30 DAYS AFTER AUTHORIZATION

⑈837493659⑈ ⑆053101561⑆ 8018014437⑈

CHECK NUMBER 837493677

DATE 9-23-15

Mark Paffond

One Thousand 00/100 $ 1,000.00

DRIVER'S LICENSE Number State

MONEYCODE 140672 3636681 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE

This draft is not valid and will not be honored without obtaining an authorization code from EFS. To authorize, key the MoneyCode into the POS terminal or go to:

www.efsllc.com

tel: 801-624-4690 tel: 800-405-5601

Draft only honored with valid authorization code and when properly completed and identification verified prior to cashing.

Payable through WFB, N.A.
Chapel Hill, NC
Issued by Electronic Funds Source LLC

VALID FOR 30 DAYS AFTER AUTHORIZATION

⑈837493677⑈ ⑆053101561⑆ 8018014437⑈

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Rock City Heavy Haul, Inc.

Fam Trust Checking xxxx3532 S10 Ending Balance: $16,038.43

Date	Ref No.	Type	Payee	Account	Memo	Payment	Deposit	Class	Stat	Balance
02/10/2015	29516	Check	Mark Pafford	Expense Reimbursment		$20.75			R	n/a
02/20/2015	29549	Check	Mark Pafford	Expense Reimbursment		$346.69		201915	R	n/a
03/27/2015	29614	Check	Mark Pafford	Equipment		$773.46			R	n/a
04/21/2015	29697	Check	Mark Pafford	Purchased Equipment		$2,000.00			R	n/a
05/01/2015	29729	Check	Mark Pafford	Equipment		$2,000.00			R	n/a
05/05/2015	29735	Check	Mark Pafford	Equipment		$494.87			R	n/a
05/21/2015	29780	Check	Mark Pafford	Equipment		$2,000.00			R	n/a
05/21/2015	29781	Check	Mark Pafford	Expense Reimbursment	Expense	$138.34		202020	R	n/a
05/29/2015	29803	Check	Mark Pafford	Purchased Equipment	KW Trailer	$1,000.00			R	n/a
06/16/2015	29835	Check	Mark Pafford	Equipment	truck	$7,000.00			R	n/a
06/16/2015	29836	Check	Mark Pafford	Expense Reimbursment		$492.09			R	n/a
06/29/2015	Debit	Check	Mark Pafford	Permits and Escorts	purchased equipment	$2,500.00			R	n/a
07/07/2015	29874	Check	Mark Pafford	Expense Reimbursment		$678.37			R	n/a
07/14/2015	Debit	Check	Mark Pafford	Purchased Equipment		$3,000.00			R	n/a
07/16/2015	29891	Check	Mark Pafford	petty cash		$1,000.00			R	n/a
07/28/2015	Debit	Check	Mark Pafford	Purchased Equipment	Mark Pafford	$2,000.00			R	n/a
08/04/2015	29938	Check	Mark Pafford	Expense Reimbursment		$781.85		202098	R	n/a
08/05/2015	29945	Check	Mark Pafford	Expense Reimbursment		$2,377.61		truck 52	R	n/a
08/06/2015	29946	Check	Mark Pafford	Equipment		$10,000.00			R	n/a
09/21/2015	30031	Check	Mark Pafford	EQUIPMENT PURCHASE		$1,000.00			R	n/a
10/07/2015	30065	Check	Mark Pafford	Expense Reimbursement		$2,956.95			R	n/a
10/19/2015	30081	Check	Mark Pafford	EQUIPMENT PURCHASE		$5,000.00			R	n/a
11/17/2015	30107	Check	Mark Pafford	Expense Reimbursment		$244.45			R	n/a
11/19/2015	30109	Check	Mark Pafford	EQUIPMENT PURCHASE		$2,000.00			R	n/a
12/22/2015	30161	Check	Mark Pafford	EQUIPMENT PURCHASE		$5,000.00			R	n/a
01/06/2016	30187	Check	Mark Pafford	Expense Reimbursement		$489.61			R	n/a
02/19/2016	30250	Check	Mark Pafford	EQUIPMENT PURCHASE		$3,000.00			R	n/a
02/19/2016	30252	Check	Mark Pafford	Expense Reimbursement		$288.54			R	n/a
03/04/2016	30265	Check	Mark Pafford	Purchases		$3,000.00			R	n/a
03/24/2016	30301	Check	Mark Pafford	Expense Reimbursement		$671.42			R	n/a
03/24/2016	30302	Check	Mark Pafford	EQUIPMENT PURCHASE		$5,000.00			R	n/a
04/22/2016	30356	Check	Mark Pafford	EQUIPMENT PURCHASE		$3,000.00			R	n/a
06/20/2016	30420	Check	Mark Pafford	Expense Reimbursement		$815.24			R	n/a
06/20/2016	30421	Check	Mark Pafford	EQUIPMENT PURCHASE		$5,000.00			R	n/a
07/12/2016	30440	Check	Mark Pafford	EQUIPMENT PURCHASE		$3,000.00			R	n/a

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

07/08/2016 14:52:56 hc.com

CREDIT CARD

VISA SALE

Card #	XXXXXXXXXXXX6525
SEQ #:	15
Batch #:	1126
INVOICE	17
Approval Code:	193407
Entry Method:	Manual
Mode:	Online
Tax Amount:	$0.00
Avs Code:	NNN
Card Code:	M

SALE AMOUNT $761.97

CUSTOMER COPY

CHARLOTTE, NC 28273
1-704-909-3799

INVOICE

Phone: (803) 324-4125	PO#: KW 086058	Invoice No: T00595603194843

Truck #	Customer	Driver No	Invoice Date
	STEPHEN G		7/08/2016

/ Haul
:d N
)730-3335

SHIP TO

Rock City Heavy Hall
154 Anderson Rd N
Rock Hill SC 29730

DELIVER

Description	Ordered	B/O	Shipped	Each	Total
KIT-U JOIN T 1000	2		2	17.77	35.54
DIPSTICK	1		1	23.36	23.36
KW TORQUE ROD	2		2	207.89	415.78
DRAG LINK .	1		1	287.29	287.29

24/7 Mobile Maintenance available on all makes! Call Today!
Parts and Service hours:24/5 and Saturday 7-3:30pm
RF3030KM: Standard 3030 Brake Chambers only $29.99 each!

Preferred Partners

CASH	CHECK	CHECK No.	CR. CARD	CARD Authorization	CR. MEMO DEPOSIT

SUBTOTAL	761.97
TAX .000 %	
SUBLET	
OTHER	
SHIPPING	
TOTAL DUE	761.97

CUSTOMER AUTHORIZATION AND AGREEMENT

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THIS ORDER CONTAINS A BINDING ARBITRATION PROVISION WHICH MAY BE ENFORCED BY THE PARTIES.

Customer Copy

CUSTOMER AUTHORIZED SIGNATURE

PAGE: 1

13:27
Form-CTXDOCE (PART-SALES-W1-4.9-02-A) Rev 12/12

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

RESPONSE TO REQUEST TO PRODUCE #6

10 26 2016 10:51:54 tha.com

DEBIT CARD

DEBIT SALE

Card #	[illegible]
Network:	VISA
Chip Card:	US DEBIT
AID:	A0000000980840
ATC:	0040
TC:	46B62D6F0BA140A0
SEQ #:	5
Batch #:	1219
INVOICE	5
Approval Code:	188532
Entry Method:	Chip Read
Mode:	[illegible]
Tax Amount:	$0.00

SALE AMOUNT $521.02

230 E WESTINGHOUSE BLVD
CHARLOTTE, NC 28273
1-704-909-3799

OICE

ones: (803) 324-4125	PO#: MARK	Invoice No: T00596603200962

Check ID	Customer ID	Driver No.	Invoice Date
	RUSTY B		10/26/2016

/ Haul
d N
730-3335

SHIP TO
Rock City Heavy Hall
154 Anderson Rd N
Rock Hill SC 29730

DELIVER

Description	Ordered	B/O	Shipped	Each	Total
CROSSMEMBE R-REAR	1		1	521.02	521.02

CUSTOMER COPY

24/7 Mobile Maintenance available on all makes! Call Today!
Parts and Service hours:24/5 and Saturday 7-3:30pm
R73030MV: Standard 3030 Brake Chambers only $29.99 each!

Preferred PARTNERS

CASH	CHECK	CHECK No:	CR. CARD	CARD Authorization	CR. MEMO
					DEPOSIT

SUBTOTAL	521.02
TAX .000 %	
SUBLET	
OTHER	
SHIPPING	
TOTAL DUE	521.02

CUSTOMER AUTHORIZATION AND AGREEMENT

Customer Copy

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CUSTOMER AUTHORIZED SIGNATURE

9:50

Form-CTXDOCE (PART-SALES-WI-4.9-02-A) Rev 12/12

PAGE: 1

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10 28 2016 11:44:37

DEBIT CARD

DEBIT SALE

Card #	[illegible]
Network:	VISA
Chip Card:	US DEBIT
AID:	A0000000[illegible]
ATC:	00A3
TC:	77A764AE1BA[illegible]001
SEQ #:	4
Batch #:	1221
INVOICE	4
Approval Code:	121329
Entry Method	Chip Read
Mode	[illegible] - PIN Verified
Tax Amount:	$0.00

SALE AMOUNT $446.00

CUSTOMER COPY

230 E WESTINGHOUSE BLVD
CHARLOTTE, NC 28273
1-704-909-3799

INVOICE

Phone: (803) 324-4125	PO#:	Invoice No: T00595603201114

Service ID	Counterman	Drawer No.	Invoice Date
	RUSTY B		10/28/2016

haul
N

30-3335

SHIP TO
Rock City Heavy Hall
154 Anderson Rd N
Rock Hill SC 29730

DELIVER

Part Number	Ordered	Bid	Shipped	Price	Total
KIT-HEAT E XCHANGER	1		1	446.00	446.00

24/7 Mobile Maintenance available on all makes! Call Today!
Parts and Service hours:24/5 and Saturday 7-3:30pm
RP3030DM: Standard 3030 Brake Chambers only $29.99 each!

Preferred PARTNERS

CASH	CHECK	CHECK No.	CR. CARD	CARD Authorization	CR. MEMO DEPOSIT

SUBTOTAL	446.00
TAX .000 %	
SUBLET	
OTHER	
SHIPPING	
TOTAL DUE	446.00

CUSTOMER AUTHORIZATION AND AGREEMENT

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Customer Copy

CUSTOMER AUTHORIZED SIGNATURE

10:42

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PAGE: 1

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

10-31-2016 09:31:55

DEBIT CARD

DEBIT SALE

Card #:	XXXXXXXXXXXX6525
Network:	VISA
Chip Card:	US DEBIT
AID:	A0000000980840
ATC:	00A6
TC:	F2F41B537A58E080
SEQ #:	5
Batch #:	1223
INVOICE	5
Approval Code:	363690
Entry Method:	Chip Read
Mode:	Online - PIN Verified
Tax Amount:	$0.00

SALE AMOUNT $659.78

CUSTOMER COPY

hc.com

CHARLOTTE, NC 28273
1-704-909-3799

)ICE

ne: (803) 324-4125	PO#: BXS12767 CAT	Invoice No: T00595603201191

Technician	Accounting Ref	Driver No	Invoice Date
	STEPHEN G		10/31/2016

Haul
N

'30-3335

SHIP TO
Rock City Heavy Hall
154 Anderson Rd N
Rock Hill SC 29730

DELIVER

Description	Ordered	S/B	Shipped	Each	Total
PUMP A WAT ER	1		1	659.78	659.78
PUMP A WAT ER	1		1	692.07	692.07
WATER PUMP WATER PUM	1-		1-	692.07	692.07-

24/7 Mobile Maintanence available on all makes! Call Today!
Parts and Service hours:24/5 and Saturday 7-3:30pm
RF3030MW: Standard 3030 Brake Chambers only $29.99 each!

Preferred PARTNERS

CASH	CHECK	CHECK No.	CR. CARD	CARD Authorization	CR. MEMO
					DEPOSIT

SUBTOTAL	659.78
TAX .000 %	
SUBLET	
OTHER	
SHIPPING	
TOTAL DUE	659.78

CUSTOMER AUTHORIZATION AND AGREEMENT

Customer Copy

1. IMPORTANT: THIS PARTS ORDER AND INVOICE ("Order") CONSISTS OF THE TERMS EXPRESSLY SET FORTH HEREIN AND THE TERMS AND CONDITIONS SET FORTH AT WWW.MHCSOUTHEASTERN.COM ("Terms and Conditions") which are fully incorporated herein by this reference. Execution of this Order shall constitute Customer's agreement to the terms of this Order, including the Terms and Conditions. Customer acknowledges that, upon Customer's request, Customer may obtain a print-out of the Terms and Conditions from Dealer prior to executing this Order. Customer represents that Customer has had an opportunity to read and understand the terms of this Order, including the Terms and Conditions. Customer's acceptance of this Order is limited to Customer's execution of this order as required below, and no contract or agreement for the goods or and described herein ("Parts") will be formed except parts pursuant to and as permitted by this Order. This Order represents the entire and integrated agreement between the Customer and Dealer regarding the purchase and sale the Parts and cancels and supersedes all prior negotiations, representations or agreements, either oral or written. Additional or substitute terms will not become part of this Order unless accepted in a writing signed by a corporate officer or authorized manager of Dealer.
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CUSTOMER AUTHORIZED SIGNATURE

9:30

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PAGE: 1

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85 Dealers In 16 States, www.mhc.com

CHARLOTTE, NC 2
1-704-909-3799

08/17/2016 11:29:2

PARTS INVOICE

Customer No: 190591	Phone: (803) 324-4125	PO#: 555791

Tax Status	Terms	Truck ID	Counterman	Drawer No.
RESALE	CASH		STEPHEN G	

CREDIT CARD
VISA SALE

Card #: XXXXXXXXXXXX6
SEQ #:
Batch #: 1
INVOICE
Approval Code: H67
Entry Method: Manual
Mode: Online
Tax Amount: $0.00
Avs Code: NHP
Card Code:

SALE AMOUNT $98.0

SOLD TO
Rock City Heavy Haul
154 Anderson Rd N
Attn Marc
Rock Hill SC 29730-3335

SHIP TO
Rock City Heavy Ha
154 Anderson Rd N
Rock Hill SC 2973C

DELIVER

Line	Part Number	Description	Ordered	B/O	Shipped
1	140401	SENDER-TEM PERATURE	2		2

CUSTOMER COPY

24/7 Mobile Maintanence available on all makes! Call Today!
Parts and Service hours:24/5 and Saturday 7-3:30pm
RF3030HW: Standard 3030 Brake Chambers only $29.99 each!

Preferred PARTners

WILLER WIX-N CAT SPICER HOST ROADFORCE AXALTA

CASH	CHECK	CHECK No.	CR. CARD	CARD Authorization	CR. MEMO DEPOSIT

SUBTOTAL	98.04
TAX .000 %	
SUBLET	
OTHER	
SHIPPING	
TOTAL DUE	98.04

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Customer Copy

CUSTOMER AUTHORIZED SIGNATURE

9:31

Form-CTXDOCE (PART-SALES-WI-4.9-02-A) Rev 12/12

PAGE: 1

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38-12/2016 17:09:01 mhc.com

CREDIT CARD

VISA SALE

Card #: XXXXXXXXXXXX6525
SEQ #: 17
Batch #: 1156
INVOICE 18
Approval Code: 036833
Entry Method: Manual
Mode: Online
Tax Amount: $0.00
AVS Code: NNN
Card Code: M

SALE AMOUNT $617.31

CUSTOMER COPY

CHARLOTTE, NC 28273
1-704-909-3799

OICE

Phone: (803) 324-4125 | PO#: TRUCK SERVICE | Invoice No: T00595603196877

Truck ID	Salesman	Driver ID	Invoice Date
	JIMMY B		8/12/2016

ry Haul
Rd N

29730-3335

SHIP TO

Rock City Heavy Hall
154 Anderson Rd N
Rock Hill SC 29730

DELIVER

Description	Order	Bkd	Shipped	Price	Total
KIT-SLACK ADJ & CLEV	1	1	1	116.69	116.69
LOCK NUT C P 5/8-18	4	4	4	.80	3.20
WASHER	4	4	4	2.14	8.56
VALVE-DRAI N AIR TAN	6	6	6	16.68	100.08
KIT-REPLAC EMENT U J	2	2	2	194.39	388.78

24/7 Mobile Maintanence available on all makes! Call Today!
Parts and Service hours:24/5 and Saturday 7-3:30pm
RF3030KW: Standard 3030 Brake Chambers only $29.99 each!

Preferred PARTNERS

SUBTOTAL	617.31
TAX .000 %	
SUBLET	
OTHER	
SHIPPING	
TOTAL DUE	617.31

CASH	CHECK	CHECK No.	CR. CARD	CARD Authorization	CR. MEMO DEPOSIT

CUSTOMER AUTHORIZATION AND AGREEMENT

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CUSTOMER AUTHORIZED SIGNATURE

PAGE: 1

16:06
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:24:2016 13:16:42 ...a.com

CREDIT CARD
VISA SALE

...ed #	XXXXXXXXXXXX6525
...EQ #:	8
Batch #:	1166
INVOICE	0
...pproval Code:	184704
Entry Method:	Manual
Mode:	Online
...ax Amount:	$0.00
...vs Code:	NNN
Card Code:	M

SALE AMOUNT $365.50

CUSTOMER COPY

CHARLOTTE, NC 28273
1-704-909-3799

...OICE

...ne: (803) 324-4125	PO#:	Invoice No: T00595603197512

Truck ID	Salesman	Driver No.	Invoice Date
	DJ F		8/24/2016

...Haul
...N
...30-3335

SHIP TO
Rock City Heavy Hall
154 Anderson Rd N
Rock Hill SC 29730

DELIVER

Description	Ordered	Held	Shipped	Each	Total
BOOT-LOWER SHIFT	1		1	48.16	48.16
BOOT-SHIFT LEVER UP	1		1	25.00	25.00
BUSHING-SN UBBER BAR	2		2	52.44	104.88
BUSHING-EN GINE REAR	2		2	93.73	187.46

24/7 Mobile Maintenance available on all makes! Call Today!
Parts and Service hours:M/5 and Saturday 7-3:30pm
RF1030HW: Standard 3030 Brake Chambers only $29.99 each!

Preferred PARTNERS

SUBTOTAL	365.50
TAX .000 %	
SUBLET	
OTHER	
SHIPPING	
TOTAL DUE	365.50

CASH	CHECK	CHECK No.	CR. CARD	CARD Authorization	CR. MEMO
					DEPOSIT

CUSTOMER AUTHORIZATION AND AGREEMENT

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Customer Copy

CUSTOMER AUTHORIZED SIGNATURE

PAGE: 1

...:52
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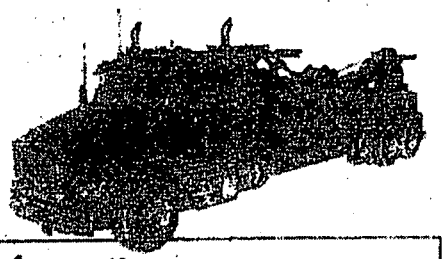
Rock City Truck Service Inc

154 North Anderson Road
Rock Hill, SC 29730
803-324-4141 OFFICE
803-324-2145 FAX
Rockcitytruckservice@outlook.com

Invoice

Date	Invoice #
6/15/2016	2809



Truck Information

Truck #	Trailer #	Reference #
2005 PETER...		

Customer

MARK PAFFORD'S
2535 FERGUSON DR
ROCK HILL SC 29730

Item	Description	Quanti...	Rate	Amount
Labor	SHOP LABOR REPAIR BACK OF CAB	12.4	95.00	1,178.00
Labor	SHOP LABOR REMOVE FRONT FENDERS AND REPLACE WITH NEW FENDERS	4.5	95.00	427.50
PARTS	LEFT FRONT FENDER PETERBILT 379		387.24	387.24T
PARTS	RIGHT FRONT FENDER PETERBILT 379		378.14	378.14T
Labor	REPLACE FRONT BUMPER	2.1	95.00	199.50
PARTS	NEW PETERBILT 379 BUMPER	1	527.14	527.14T
Labor	SHOP LABOR REMOVE WHEELS FROM TRUCK AND SAND FRAME,REARENDS AND AXLES	7.3	95.00	693.50
PARTS	CHASSIS BLACK PAINT	1	128.47	128.47T
PARTS	66864 BRAKE DRUM	4	134.84	539.36T
PARTS	4709ES2 BRAKE SHOES	4	48.17	192.68T
PARTS	370003A SEALS	4	46.88	187.52T
Labor	SHOP LABOR INSTALL NEW BRAKES AND SEALS	8	95.00	760.00
PARTS	PAINT AND SUPPLIES FOR PAINTING FENDERS	1	408.47	408.47T
PARTS	PAINT FOR REAR OF CAB	1	157.14	157.14T
Labor	FREDS TRUCK DETAIL BULK HEAD POLISHED		600.00	600.00
Labor	FREDS TRUCK DETAIL WHEELS AND TANK AND CROWN POLISHED		1100.00	1,100.00
	Sales Tax		7.00%	203.43

Total $8,068.09

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3063 S Paraham Rd
York, SC 29745

803-984-4162
grizdeck@gmail.com

Invoice# 102017A

Date: 10-20-2017

Bob Duncan
5300 Bluebird Lane
York, SC 29745
803-415-1939

Description	Quantity	Cost	Amount
Paint and supplies	1	$ 865.00	$865.00
Labor			
Prep & refinish tank (Custom Paint)	18	$ 45.00	$810.00
Repair & refinish rear fender (Custom Paint)	13	$ 45.00	$585.00
Repair & refinish side covers (Custom Paint)	8	$ 45.00	$360.00
Repair & refinish front fender (Custom Paint)	13	$ 45.00	$585.00
Repair & refinish saddle bags (Custom Paint)	22	$ 45.00	$990.00
		Total	$4,195.00

Paid in Cash 10-20-17

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ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

AFFIDAVIT

I am Robert Wayne Duncan Sr. I am President of Rock City Heavy Haul Inc. My son is Robert Wayne Duncan Jr is Vice President. We entered into a verbal contract with Mark Giles Pafford in 2015 to purchase one 2003 Kenworth road tractor, one 1998 Trailking trailer and one 2009 Trailking trailer for the total sum of $ 85,000.00. No set payment schedule was agreed to. The agreement was when amount was paid in full Mr. Pafford would turn over titles. We have cancelled checks for the total amount and on 10/10/2016 Mr. Pafford was supposed to sign over titles. Mr. Pafford only had one title to the 2003 Kenworth tractor but it was in some womans name. We told Mr. Pafford he had to transfer ownership to him so he could transfer to us. He had no trailer titles. He was working on obtaining titles. We have had numerous meetings with Mr. Pafford about this matter and he has promised to deliver his part of contract.

Mr. Pafford has broke into our garage and did considerable damage to security fence, garage doors, motorcycles, and 2003 Kenworth tractor Mr. Pafford faces charges on this offence. Mr. Pafford also was arrested later for violating a court order for trespassing on our property. I have information and beleif that Mr. Pafford has been trying to sell the equipment that we purchased to someone else. If Mr. Pafford gains possession of tractor he will sell to someone else.

We are filing a lawsuit against Mr. Pafford for titles. We are trying to obtain rightful ownership with the court. We do not beleive that Mr. Pafford was the rightful owner of equipment when he sold this equipment.

Robert Wayne Duncan Sr. President
Rock City Heavy Haul. Inc

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

AFFIDAVIT

I am Nancy Green Duncan. I am employed by Rock City Heavy Haul, Inc. I am the bookkeeper and Control checking accounts. I handle all accounting maters. Mark Pafford sold our company a 2003 Kenworth Tractor and 2 trailers for $85.000.00 in 2015. Payments were made from the company Checking account. In Oct 2016 last payment was made and Mr. Pafford was supposed to give the Company titles for equipment. He tried to submit one title to 2003 Kenworth and no trailer titles. The Kenworth was in the name of some woman and was not acceptable. I met with Mr Pafford numerous times and showed him Where monies were paid. I gave Mr. Pafford copies of all transactions. I met with Mr. Pafford on July 11 2017 when he said he had not been paid. I showed him all transactions and he finally agreed. He was Supposed to bring in proper titles the next morning but did not. He insisted on more money and was Paid an additional 10,000.00 overpayment. He never furnished proper titles to anything. It seemed that Mr. Pafford was not the rightful owner to the equipment. I advised Mr. Pafford that if he lost title's he could go to the Department of Motor Vehicles and obtain duplicates

Nancy Green Duncan

Nancy Green Duncan

Office Manager

Rock City Heavy Haul, Inc

Robert Wayne Duncan Sr.
5300 Bluebird Lane
York, S.C. 29730

January 16, 2018

I own an antique Harley Davidson motorcycle with a custom paint job. It contains 4 different colors with flames and stripes. I keep this vehicle at my son's house at 1215 Paraham Rd. York S.C. 29745. I just use this vehicle for competition shows.

On or about August 16, 2017 Mark Pafford and 2 other men broke into my son's Garage. They broke a window above my motorcycle and shattered glass on my motorcycle causing damage to paint job. Then they climbed through window and used My motorcycle as a ladder. Damage was done to my paint job in this robbery. To repair The damage I have estimates over $4000.00.

Respectfully:

Robert Wayne Duncan Sr.

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The Genuine. The Original.

Overhead Door Company of Charlotte

QUOTATION

Q-168740.00

To: Robert Duncan
1215 S Paraham Rd
Rock Hill, SC 29745

Attn:

Phone: 803.242.5453

Fax:

Email:

Issued: Wednesday, August 23, 2017
Expiration: Friday, September 22, 2017
Sales Contact: Christine Osha
Direct:
Email: (704) 591-9288

Reference: Robert Duncan

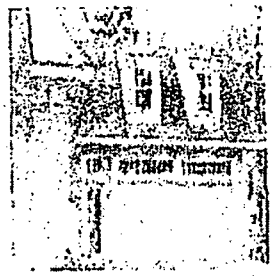
Qty	Description	Price	Total

model 195
size 12x12
white
1 section glass
sherwood 1 trim

disregard stock photo on quote. Door quoted is the same style as existing garage doors.

Overhead Door Thermacore Insulated Steel Garage Door $4,258.00

flush panel model 195



Quoted price includes removal and haul away of existing door.
Complete installation of new garage door.
Labor
Tax

Total Including Taxes: $5,102.79

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Neighborhood Garage Door Service of Charlotte
2905 Westinghouse Blvd #400 Charlotte NC 28273
(704) 769-2207

Date	Invoice #
2017-08-17	1065276

HOME IMPROVEMENT CONTRACT

This Agreement signed by the Owner and dated as above is between and the customer listed (hereafter "Owner" and/or "Customer") will perform the work specified herein at the property listed above on behalf of the Owner, Legal Resident or Tenant.

NSF, cancelled or returned checks will be subject to $25.00 charge.

OK for Contractor to take replaced parts.

I agree to receive text messages regarding this transaction to the mobile number provided

Description of the Project and Description of the Significant Materials to be Used and Equipment to be Installed:
We will furnish all labor, equipment, materials, etc., to complete in a good and workmanlike manner the work listed in the column below titled PROJECT DESCRIPTION / MATERIALS TO BE REPAIRED OR INSTALLED (If additional room is needed, attach additional sheets and identify that sheet in the provision entitled "List of Documents to be Incorporated into the Contract"):

Your Technician CHRIS

Customer Information
Name Robert , Duncan
Address 1215 S Parsham Rd
City YORK *State* SC *Zip* 29745
Cell (803) 242-5453 *Home*
Email brandy@rockcityheavyhaul.com

All sales are final. No refunds or returns.
Notice of cancellation may be mailed to the contractor at the address noted on the contract.

- ELECTRONIC CHECK DISCLAIMER
  When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. For inquiries, please call the number on your invoice.
- CREDIT CARD DISCLAIMER
  The card issuer (Credit Institution) is authorized to pay the amount indicated as contract price on this invoice. Customer(s) acknowledges receipt of goods, services, and repairs in the amount above, all pricing on services performed on this invoice were explained to me in detail and given my approval before any work/service was performed. I agree and understand all parts and services are non-refundable. All invoices will be due and paid upon completion of work. Sorry, no billing or payment plans without preauthorized credit approval. Coupons are only valid at the time of the estimate and cannot be combined with other offers or discounts. Door deposits are authorized to charge the credit card over the phone and agree(s) to pay any and all restocking and cancellation changes. Customer(s) acknowledge and agree to pay up to 4% convenience fee for paying with any type of credit card.

THANK YOU.

Installed 3 jackshaft
Programmed remotes
Tested doors and operators

Installing 3 jack shafts
Picking up motors from warehouse in the morning and coming back to install

Garage Door Price	$0.00
Garage Door Coupon or Discount	-$0.00
Garage Door Openers & Parts Price	$1,949.97
Garage Door Openers & Parts Coupon or Discount	-$599.97
Service & Installation Amount	$0.00
Service & Installation Coupon or Discount	-$0.00
Garage Door Haul Off	$0.00
Garage Opener Haul Off	$0.00
Recycling, Disposal & Fuel	$12.95
Military, Senior, etc. 5% Parts Discount	-$0.00
TOTAL DISCOUNT / COUPONS	-$599.97
SUBTOTAL (Pre-Tax)	$1,362.95
SALES TAX	$94.50
GRAND TOTAL	$1,457.45
Amount of Deposit Collected	$1,457.45
Remaining Balance Due	$0.00

☐ MASTERCARD ☐ VISA ☐ AMEX ☐ DISCOVER

LAST 4 DIGITS:_____ CARD HOLDER:

EXP:_____

SIGNATURE

CASH: $0.00

CHECK NUMBER: / COUPON 001526

CREDIT CARD APP #

CARD HOLDER SIGNATURE MUST MATCH CREDIT INSTITUTION'S RECORDS/FILES 2017-08-17

All sales are final. No refunds or returns.

3.159% Mobile Convenience Processing Fee will be added to all Non Check/Cash Transactions

Downpayment: If any, if not applicable, put "none": $_____. THE DOWNPAYMENT MAY NOT EXCEED $1,000 OR 10% OF THE CONTRACT PRICE.

Substantial commencement of work under this contract is described as SALE

Approximate Start Date: 08/17/17 07:03 Approximate Completion Date: 08/17/17 14:16

Release: Upon satisfactory payment being made for any portion of the work performed, the Contractor shall, prior to any further payment being made, furnish to the person contracting for the home improvement or swimming pool work a full and unconditional release from any claim of mechanic's lien for any person entitled to make such a claim of lien pursuant to Sections 8400 and 8404 of the Civil Code for that portion of the work for which payment has been made.

Allowances: The following items or specific prices as indicated are included in the contract price as allowances. The contract price will be adjusted upward or downward based on actual amounts rather than estimated amounts herein _____

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1065278

We will furnish all labor, equipment, materials, etc. to be complete in a good and workmanlike manner.

Descriptions of the Project and description of the Significant Materials to be Used and Equipment to be Installed:

Labor Warranty	30 Days	Parts Warranty	Lifetime	OP. Door Warranty	No Warranty

QTY.	PKG#	PROJECT DESCRIPTION/ MATERIALS OF REPAIRED OT INSTALLED	LIST PRICE	SERVICE & INSTALLATION	DISCOUNT COUPONS	TOTAL
1	-	LM 8500 JACKSHAFT	$649.99	.	-$199.99	$450.00
		Dismantling, Reinstallation and/or Service/Programming	.	$0.00	.	$0.00
1	-	LM 8500 JACKSHAFT	$649.99	.	-$199.99	$450.00
		Dismantling, Reinstallation and/or Service/Programming	.	$0.00	.	$0.00
1	-	LM 8500 JACKSHAFT	$649.99	.	-$199.99	$450.00
		Dismantling, Reinstallation and/or Service/Programming	.	$0.00	.	$0.00

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Safety Checklist

Hardware	Option	Fair	Poor	Safety Risk
Springs	Torsion Extension	☑		
Hinges	#1 #2 #3 #4 #5	☑		
Struts N/A	8ft 16ft 18ft			
Torsion Tube	8ft 16ft 18ft	☑		
Drums	7ft 10ft	☑		
Rollers	Short Long		☑	
Track	Horizontal Vertical	☑		
Cables	Rear 7ft 8ft Custom	☑		
Pulley N/A				
Panels	Crack Rip Dent Rust	☑		
End Bearing		☑		
Center Bearing		☑		
Center Bearing Plate		☑		
Top Fixture		☑		
Bottom Fixture		☑		
Tilt Up Door Hardware Kit N/A				
Slide Lock		☑		
T-Lock N/A				
Vault Release N/A				
Windows	Broken Cracked		☑	
Door Obstructions	Clear ☑ Debris Wall Personal Belongings Needs 10ft Clearance			

Operator Related	Option	Fair	Poor	Safety Risk
Rail Length N/A	7ft 8ft 8ft+			
Rail Type N/A	Chain Screw Belt			
Trolley N/A	Chain Screw Belt			
Drive Gears N/A				
Force Adjustment N/A				
Limit Switch N/A				
Capacitor N/A				
Safety Eyes N/A	Obstructed			
Circuit Board N/A	Model # 0			
External Receiver N/A	Model # 0			
Wireless Keypad N/A	Model # 0			
Remote N/A	Model # 0			
Wall Button N/A	Premium Basic Door Bell			

*No warranty if bad parts are not replaced. Due to sensitivity to weather changes opener adjustments are NOT covered under warranty.

Technician: CHRIS
Date: 2017-08-17 14:15:52.0
Ticket #: #1065278

Customer Name: Robert , Duncan
Address: 1215 S Paraham Rd YORK , 29745
Customer Initials: DR

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STATE OF SOUTH CAROLINA

CERTIFICATE OF TITLE

OF A VEHICLE

VEHICLE ID NUMBER
TXKWDB9X03H192961

YEAR MAKE
2003 KW

MODEL
CONSTR

NEW/USED
USED

BODY STYLE
DT

DATE
03/18/07

ODOMETER READING
17861

TITLE NUMBER
770[illegible]

VEHICLE BRAND(S)
NONE

FULL NAME OF OWNER(S)
PATFORD, MARK GILES
2735 PERCUSSION DR
ROCK HILL, SC 29730-8050

CUSTOMER NUMBER: 20047361

[redacted]

THE SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE PERSON HEREIN IS REGISTERED BY THIS DEPARTMENT AS THE LAWFUL OWNER OF THE VEHICLE DESCRIBED SUBJECT TO THE LIENS, IF ANY, HEREIN SET FORTH.

KEVIN A. SHWEDO
EXECUTIVE DIRECTOR

BERRY [illegible]
[illegible] DIRECTOR

KEEP IN A SAFE PLACE — AN ALTERATION OR ERASURE VOIDS THIS TITLE

39212146

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TRA #46

STATE OF SOUTH CAROLINA

CERTIFICATE OF TITLE

OF A VEHICLE

VEHICLE ID NUMBER	YEAR	MAKE	MODEL	NEW/USED
1XKWDB9X03J392961	2003	KW	CONSTR	USED

BODY STYLE	DATE ISSUED	ODOMETER	WEIGHT	TITLE NUMBER
TR	08-15-2012	619,921	17360	770850252039508

VEHICLE BRAND(S)
NOT ACTUAL MILEAGE

FULL NAME OF OW[redacted]ER NUMBER: 032571486
DOUGLAS ELIZAB[redacted]
VERSATILE TRAN[redacted]
1824 RANCH RD[redacted]
RICHBURG SC 2[redacted]

THE SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE PERSON HEREIN IS REGISTERED BY THIS DEPARTMENT AS THE LAWFUL OWNER OF THE VEHICLE DESCRIBED SUBJECT TO THE LIENS, IF ANY, HEREIN SET FORTH.

KEVIN A. SHWEDO
EXECUTIVE DIRECTOR

NIKKI R. HALEY
GOVERNOR

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RESPONSE TO REQUEST TO PRODUCE #9

#129

STATE OF SOUTH CAROLINA

CERTIFICATE OF TITLE

OF A VEHICLE

VEHICLE ID NUMBER	YEAR	MAKE	MODEL	NEW/USED
1TKB04820WM101118	1998	TLKG	TK70MG	USED

BODY STYLE	DATE ISSUED	ODOMETER	WEIGHT	TITLE NUMBER
TL	11-20-2007		20000	7701201859237B4

VEHICLE BRAND(S)
ACTUAL MILEAGE

FULL NAME OF OWNER(S)
PAFFORD, MARK GILES
1238 OAKDALE RD
ROCK HILL SC 297308707

CUSTOMER NUMBER: 024947361

THE SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE PERSON HEREIN IS REGISTERED BY THIS DEPARTMENT AS THE LAWFUL OWNER OF THE VEHICLE DESCRIBED SUBJECT TO THE LIENS, IF ANY, HEREIN SET FORTH.

MARCIA S. ADAMS
EXECUTIVE DIRECTOR

MARK SANFORD
GOVERNOR

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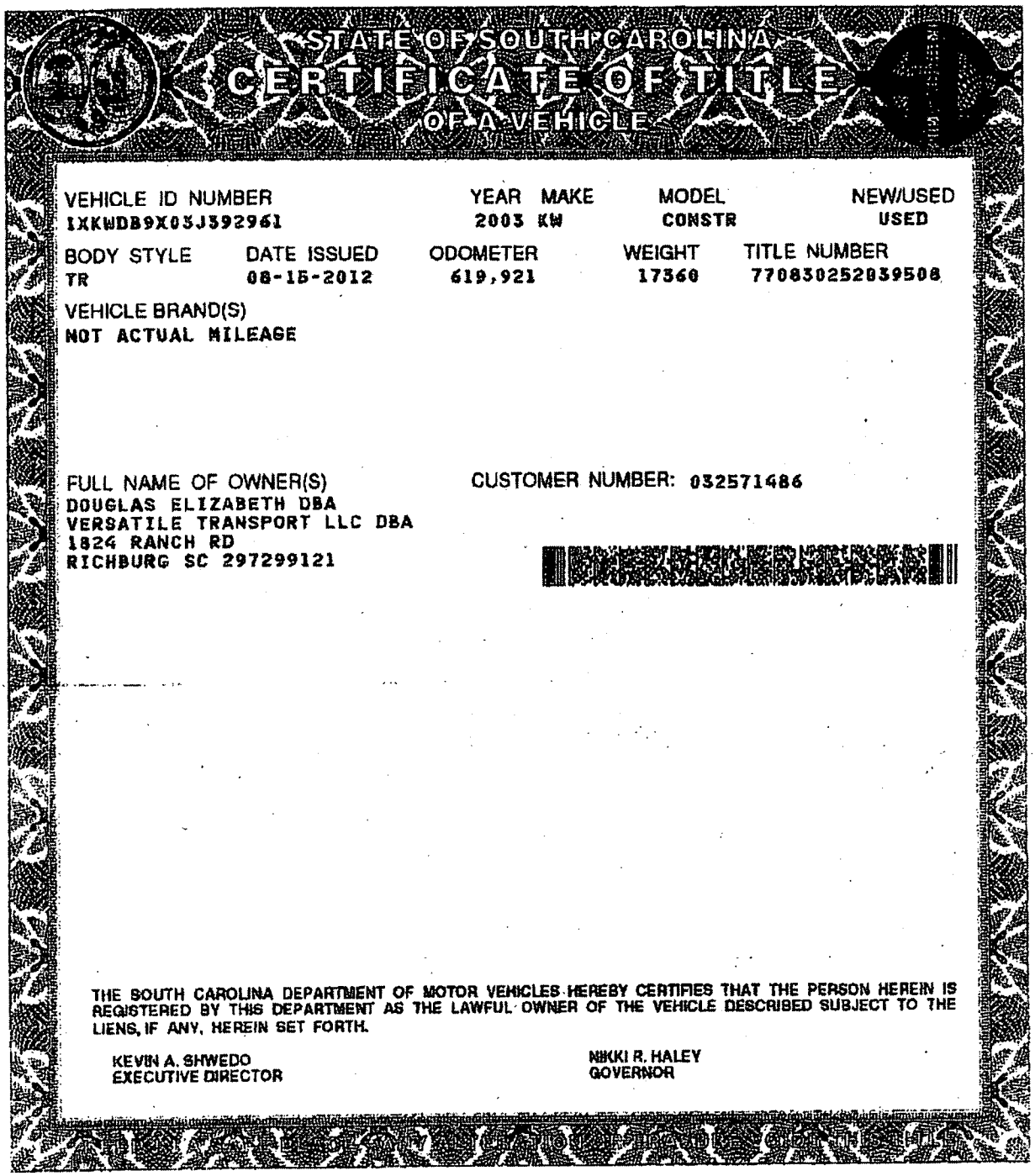
#46



STATE OF SOUTH CAROLINA

CERTIFICATE OF TITLE

OF A VEHICLE

VEHICLE ID NUMBER	YEAR	MAKE	MODEL	NEW/USED
1XKWDB9X03J392961	2003	KW	CONSTR	USED

BODY STYLE	DATE ISSUED	ODOMETER	WEIGHT	TITLE NUMBER
TR	08-15-2012	619,921	17360	770830252039508

VEHICLE BRAND(S)
NOT ACTUAL MILEAGE

FULL NAME OF OWNER(S)
DOUGLAS ELIZABETH DBA
VERSATILE TRANSPORT LLC DBA
1824 RANCH RD
RICHBURG SC 297299121

CUSTOMER NUMBER: 032571486

THE SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE PERSON HEREIN IS REGISTERED BY THIS DEPARTMENT AS THE LAWFUL OWNER OF THE VEHICLE DESCRIBED SUBJECT TO THE LIENS, IF ANY, HEREIN SET FORTH.

KEVIN A. SHWEDO
EXECUTIVE DIRECTOR

NIKKI R. HALEY
GOVERNOR

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AutoDataDirect, Inc.

Scan or visit verify.add123.com to verify

Verification Code: TWDX09H

North Carolina Vehicle Record

Retrieved On: Tue April 17, 2018 04:07:23 PM EDT

Registration Data	*Vehicle Data*	*Title Data*
Tag: XW7381	**VIN:** 1XKWDB9X03J392961	**Title:** 779809112346006
Issue Date: 08/22/2011	**Year:** 2003	**Issue Date:** 01/30/2003
Exp. Date: 08/31/2012	**Make:** KW	**Use:** FARM
Co. Res: HARNE	**Model:** CONSTRUCTION	**Odo Read:** 000000000
Category: FARM VEHICLE	**Body:** TR	**Prev. Issue Date:** 08/22/2011
Prev. Tag: XW7381	**Weight:** 80000	
Prev. Exp. Date: 08/31/2012	**Fuel Type:** D	

STATUS CURRENT TITLE, NOT HELD

Vehicle Interests

Owner 1 AG DIRECT FARMS LLC
4367 US 301 NORTH
DUNN, NC 28334

Insurance Company PROGRESSIVE SOUTHEASTERN INS **Policy:** 1765960 0

Title History

Status: CURRENT TITLE, NOT HELD
Title: 779809112346006
Transfer Date: 08/22/2011
Print Date: 08/26/2011
Owner 1: AG DIRECT FARMS LLC
Lease: No

Status: CANCELLED - VEHICLE SOLD
Title: 775750100397909
Transfer Date: 10/10/2007
Print Date: 04/07/2010
Owner 1: MARK ANDREW GODLEY
Lease: No

Status: CANCLD-NEW TITLE ISSUED
Title: 770478090129909
Transfer Date: 10/10/2007
Print Date: 01/14/2009
Owner 1: MARK ANDREW GODLEY
Lease: No

Raw Record Data

```
V012 [illegible]                GENERAL VEHICLE DETAIL          04/17/18 16:27:26
                                STATUS CURRENT TITLE, NOT HELD  CO [illegible]
TITLE     779809112346006     2003 KW          CONSTRUCTION TR
1XKWDB9X03J392961                                 DEALER        FUEL D
ACT DT  [illegible] TITLE DT  [illegible] 1RT DT  [illegible] APPL DT  [illegible] PRNT DT [illegible]
OWNER ID  [illegible] OWNERS  1  LIENS  0    EQUIP          TAX CNTY  HARNE

1  AG DIRECT FARMS LLC
   4367 US 301 NORTH
   DUNN NC 28334

LEGAL ID                  LEASES     CONTROL

STATE NO  [illegible]              EXP DT [illegible]  EXP DT [illegible]  MILEAGE [illegible]
PRNT DT  [illegible]    CAT    FARM VEHICLE                USE  FARM TRACT  N
P46 - PROGRESSIVE SOUTHEASTERN INS PA [illegible]
STATUS   EXPIRED              08/31/2012          [illegible] DT  [illegible] CLAT TYPE PAT

PRE/HOLD    PRE/TRANS    PRE/RELEASE   PRE/                PRE/LEASES  PRE/ENABLES
PRE/HOLD CD  PRE/          PRE/TRIP    PRE16/DEALER        PRE31/ADDINFO PRE12/PRINT
[illegible]              ADDRESS VERIFIED FOR OWNER              04/17/18 16:27:26

                                  [illegible]                 FUEL D
[illegible]                       [illegible]                 [illegible]
AG  [illegible]
[illegible]

RESIDENCE ADDRESS:
   STREET  4367 US 301 NORTH
     CITY  DUNN                   STATE  NC   ZIP  28334
```

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

COUNTY NAME
MAILING ADDRESS:
STREET
CITY STATE ZIP
VEHICLE LOCATION:
STREET
CITY STATE ZIP
COUNTY NAME
ONE-TIME MAILING ADDRESS: TITLE? REGISTRATION?
STREET
CITY STATE ZIP

PF1/HELP PF2/ PF3/RETURN PF4/ PF5/ PF6/
PF7/ PF8/ PF9/PRINT PF10/ PF11/ PF12/MENU
V034 @654 CURRENT OWNER/PRIOR PLATE 04/17/18 16:07:25
1XSWCD9X0J1592961 FUEL D
CUST ID 0202028E751A 2683 KW CONSTRUCTION TP
AG DIRECT FARMS LLC
CUST ID

TITLE NO 77560512346086 TRF DT 082211 PRNT DT 082611Y OWNERS 1
STATUS CURRENT TITLE, NOT HELD

PLT# XW7381 ISS DT 082211 EXP DT 083112 CRT DT 072112 TYP FB2
WT 00000 FRWGT DT 030012 CAT FARM VEHICLE USE FARM DRAFT N
F45 - PROGRESSIVE SOUTHEASTERN IN PR 1703868 0
STATUS EXPIRED 08/31/2012 CONTROL # LESSEES

PLT# XW7381 36385956 ISS DT 022211 EXP DT 083112 CRT DT 082211 TYP FB2
WT 00000 FRWGT DT CAT FARM VEHICLE USE FARM DRAFT N
E14 - EVERETT CASH MUTUAL INSURAN PR CAP101679
STATUS WEIGHT CHANGED 12/13/2011 CONTROL # LESSEES

PAGE 1 OF 1
PF1/HELP PF2/IMAGE PF3/RETURN PF4/ PF5/ADDRESS PF6/OWNERS
PF7/BACKWARD PF8/FORWARD PF9/PRINT PF10/DRAFTS PF11/ PF12/MENU
V017 @654 TITLE HISTORY 04/17/18 16:07:26

CRD 1XSWCD9X0J1592961 FUEL D
2823 KW CONSTRUCTION TC

AG DIRECT FARMS LLC

TITLE 77560512346086 TRF DT 082211 PRNT DT 082611Y OWNERS 1 LEASE N
STATUS CURRENT TITLE, NOT HELD DEALER

MARK ANDREW GOULEY

TITLE 77557010017509 TRF DT 101007 PRNT DT 040710Y OWNERS 1 LEASE N
STATUS CANCELLED - VEHICLE SOLD DEALER

MARK ANDREW GOULEY

TITLE 77047000012990 TRF DT 101007 PRNT DT 021409Y OWNERS 1 LEASE N
STATUS CANCELLED TITLE ISSUED DEALER

PAGE 1 OF 1
PF1/HELP PF2/IMAGE PF3/RETURN PF4/ PF5/ PF6/HOLD CD
PF7/BACKWARD PF8/FORWARD PF9/PRINT PF10/ PF11/ PF12/MENU

(DPPA 3) Verify information submitted by individual: If info not correct, to obtain correct info to prevent fraud, pursue legal remedies against or recovery of debt.

This information is provided by the North Carolina Department of Transportation (NC DOT). Auto Data Direct, Inc. is an authorized provider of real-time North Carolina motor vehicle data. Auto Data Direct, Inc. is not responsible for the unauthorized use of the information provided from the NC DOT database.

This Motor Vehicle Record is extracted directly from the State or Jurisdiction's official Motor Vehicle Records database, in real time. The authenticity of these records may be authenticated in real time using the ADD on-line authorization system.

Personal information (including, but not limited to: name, address, date of birth, DL number) appearing on driver and vehicle records is protected by the Driver Privacy Protection Act (DPPA). The use of personal information for reasons not allowed by the DPPA will result in loss of information access privileges and may result in legal action.

Any person who knowingly discloses any information in violation of the Driver Privacy Protection Act (DPPA) may be subject to criminal sanctions and civil liability specified in law for unauthorized use of the data.

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9-16-2016

Rock City Heavy Haul
154 N Anderson Road
Rock Hill SC 29745
803-324-4125

RE: Payment received

I, Mark Pafford, have received the amount of $ 10,000.00 from Rock City Heavy Haul today as a purchase toward equipment for Rock City Heavy Haul.

Signed MP
Date 9 16 14

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EXHIBIT "E"

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Mark Pafford Wages
Start Date February 10, 2015
End Date April 30, 2017

Week Ending	Amount Earned	Amount Paid	Check Number	Amount Due	Expenses Paid	Check Number	Equipment Paid	Check Number
1/9/2016	$ 1,500.00	$ -		$ 1,500.00				
1/16/2016	$ 1,500.00	$ -		$ 1,500.00				
1/23/2016	$ 1,500.00	$ -		$ 1,500.00				
1/30/2016	$ 1,500.00	$ -		$ 1,500.00				
2/6/2016	$ 1,500.00	$ -		$ 1,500.00				
2/13/2016	$ 1,500.00	$ -		$ 1,500.00				
2/20/2016	$ 1,500.00	$ 3,000.00	30251	$ (1,500.00)				
2/27/2016	$ 1,500.00			$ 1,500.00				
3/5/2016	$ 1,500.00	$ 3,000.00	30265	$ (1,500.00)				
3/12/2016	$ 1,500.00	$ -		$ 1,500.00				
3/19/2016	$ 1,500.00	$ -		$ 1,500.00				
3/26/2016	$ 1,500.00	$ 5,000.00	30301	$ (3,500.00)	$ 671.42	30302		
4/2/2016	$ 1,500.00	$ -		$ 1,500.00				
4/9/2016	$ 1,500.00	$ -		$ 1,500.00				
4/16/2016	$ 1,500.00	$ -		$ 1,500.00				
4/23/2016	$ 1,500.00	$ 3,000.00	30356	$ (1,500.00)				
4/30/2016	$ 1,500.00	$ -		$ 1,500.00				
5/7/2016	$ 1,500.00	$ -		$ 1,500.00				
5/14/2016	$ 1,500.00	$ -		$ 1,500.00			$ 20,000.00	1018
5/21/2016	$ 1,500.00	$ -		$ 1,500.00				
5/28/2016	$ 1,500.00	$ -		$ 1,500.00				
6/4/2016	$ 1,500.00	$ -		$ 1,500.00				
6/11/2016	$ 1,500.00	$ -		$ 1,500.00				
6/18/2016	$ 1,500.00	$ -		$ 1,500.00				
6/25/2016	$ 1,500.00	$ 5,000.00	30421	$ (3,500.00)	$ 815.24	30420		
7/2/2016	$ 1,500.00	$ -		$ 1,500.00				
7/9/2016	$ 1,500.00	$ -		$ 1,500.00				
7/16/2016	$ 1,500.00	$ 3,000.00	30440	$ (1,500.00)				
7/23/2016	$ 1,500.00	$ -		$ 1,500.00				
7/30/2016	$ 1,500.00	$ -		$ 1,500.00			$ 5,000.00	1082
8/6/2016	$ 1,500.00	$ -		$ 1,500.00				
8/13/2016	$ 1,500.00	$ -		$ 1,500.00	$ 147.20	30461		
8/20/2016	$ 1,500.00	$ -		$ 1,500.00				
8/27/2016	$ 1,500.00	$ 4,000.00	30472	$ (2,500.00)	$ 194.00	30469	$ 4,000.00	30472
9/3/2016	$ 1,500.00	$ -		$ 1,500.00				
9/10/2016	$ 1,500.00	$ -		$ 1,500.00	$ 77.64	30478		
9/17/2016	$ 1,500.00	$ 3,000.00	30491	$ (1,500.00)			$ 10,000.00	CASH
9/24/2016	$ 1,500.00	$ -		$ 1,500.00				
10/1/2016	$ 1,500.00	$ -		$ 1,500.00				
10/8/2016	$ 1,500.00	$ -		$ 1,500.00				
10/15/2016	$ 1,500.00	$ 3,000.00	30507	$ (1,500.00)				
10/22/2016	$ 1,500.00	$ -		$ 1,500.00				
10/29/2016	$ 1,500.00	$ 2,000.00	1162	$ (500.00)				
11/5/2016	$ 1,500.00	$ -		$ 1,500.00				
11/12/2016	$ 1,500.00	$ -		$ 1,500.00				
11/19/2016	$ 1,500.00	$ -		$ 1,500.00				
11/26/2016	$ 1,500.00	$ -		$ 1,500.00				
12/3/2016	$ 1,500.00	$ 4,000.00	30551	$ (2,500.00)				
12/10/2016	$ 1,500.00	$ -		$ 1,500.00				
12/17/2016	$ 1,500.00	$ -		$ 1,500.00				
12/24/2016	$ 1,500.00	$ -		$ 1,500.00				
12/31/2016	$ 1,500.00	$ 4,000.00	30572	$ (2,500.00)				

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Mark Pafford Wages

Start Date February 10, 2015
End Date April 30, 2017

Week Ending	Amount Earned	Amount Paid	Check Number	Amount Due	Expenses Paid	Check Number	Equipment Paid	Check Number
Total 2016	$ 79,500.00	$ 42,000.00		$ 37,500.00	$1,905.50		$ 39,000.00	
1/7/2017	$ 1,500.00	$ -		$ 1,500.00				
1/14/2017	$ 1,500.00	$ -		$ 1,500.00				
1/21/2017	$ 1,500.00	$ 4,000.00	1348	$ (2,500.00)				
1/28/2017	$ 1,500.00	$ -		$ 1,500.00				
2/4/2017	$ 1,500.00	$ -		$ 1,500.00				
2/11/2017	$ 1,500.00	$ -		$ 1,500.00				
2/18/2017	$ 1,500.00	$ -		$ 1,500.00				
2/25/2017	$ 1,500.00	$ 3,000.00	1301	$ (1,500.00)				
3/4/2017	$ 1,500.00	$ 2,000.00	92764363	$ (500.00)				
3/11/2017	$ 1,500.00	$ -		$ 1,500.00				
3/18/2017	$ 1,500.00	$ -		$ 1,500.00				
3/25/2017	$ 1,500.00	$ -		$ 1,500.00				
4/1/2017	$ 1,500.00	$ -		$ 1,500.00				
4/8/2017	$ 1,500.00	$ -		$ 1,500.00				
4/15/2017	$ 1,500.00	$ 4,000.00	30610	$ (2,500.00)			$ 4,000.00	30614
Total 2017	$ 22,500.00	$ 13,000.00		$ 9,500.00	$ -		$ 4,000.00	
Total 2015-2017	$161,500.00	$ 90,000.00		$ 71,500.00	$5,743.33		$ 58,000.00	

	Wage Due	Equipment Agreement	Equipment Paid	Equipment Due
Total Amount Due	$ 71,500.00	$95,000.00	$58,000.00	$37,000.00

Total Wages & Equipment Due **$ 108,500.00**

Total Wages Due	$ 161,500.00		**Total Equipment**	$ 95,000.00
If all payments were applied to Wages	$ 148,000.00		**Apply all Payments**	$ 148,000.00
Balance of Wages Due	$ 13,500.00		**Balance Equipment**	$ (53,000.00)
Equipment Agreement	$ 95,000.00		**Total Wages Due**	$ 161,500.00
Total Amount Due	**$ 108,500.00**		**Total Amount Due**	**$ 108,500.00**

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01.2015

sunday	monday	tuesday	wednesday	thursday	friday	saturday
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28		30	31

Quick Fact : Lots of Steel
Catawba Nuclear Station contains enough steel to make 10,000 compact cars.

New Year's Day

MLK Jr. Day

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YOUR COPY

COPY

30461

Rock City Hearing
194 Marty Avenue
Rock Hill, S.C. 29730

8/10/2016

PAY TO THE ORDER OF Mark Pafford $ **147.20

One Hundred Forty-Seven and 20/100********** DOLLARS

Mark Pafford

MEMO misc. receipts

⑈030461⑈ ⑆253279659⑆310000008359 2⑈

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ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Rock City Heavy Stash Inc.
184 North Anderson Road
Rock Hill, S.C. 29730

3061

4/11/2017

PAY TO THE ORDER OF Mark Pafford

$ 4,000.00

Four Thousand and 00/100 DOLLARS

Mark Pafford

MEMO

⑈030610⑈ ⑆253279659⑆310000008352⑈

Robert W. Duncan
DBA Rock City Truck
5300 Bluebird Lane
York SC 29745

WELLS FARGO BANK, NA
57-778/832

1301

2/23/2017

PAY TO THE ORDER OF MARK PAFFORD $ 3,000.00

Three Thousand and 00/100 DOLLARS

MARK PAFFORD

MEMO

⑈001301⑈ ⑆053207766⑆ 3984118848⑈

EFS

1104 Country Hills Dr. Suite 600
Ogden, UT 84403

CHECK NUMBER 92764363

58458/821

DATE 2-27-17

PAY TO THE ORDER OF Mark Pafford

THE SUM OF two thousand -00/100 U.S. DOLLARS $ 2000.00

DRIVER'S LICENSE 162543

MONEYCODE 140672 746 1850 000

Do not accept without obtaining authorization directly from EFS

AUTHORIZATION CODE

VALID FOR 60 DAYS AFTER AUTHORIZATION

This draft is not valid and will not be honored without obtaining an authorization code from EFS. To authorize, key the MoneyCode into the POS terminal or go to:

www.efsllc.com

tel: 801-624-4680 tel: 800-404-56

Draft only honored with valid authorization code and when properly completed and identification verified prior to ces

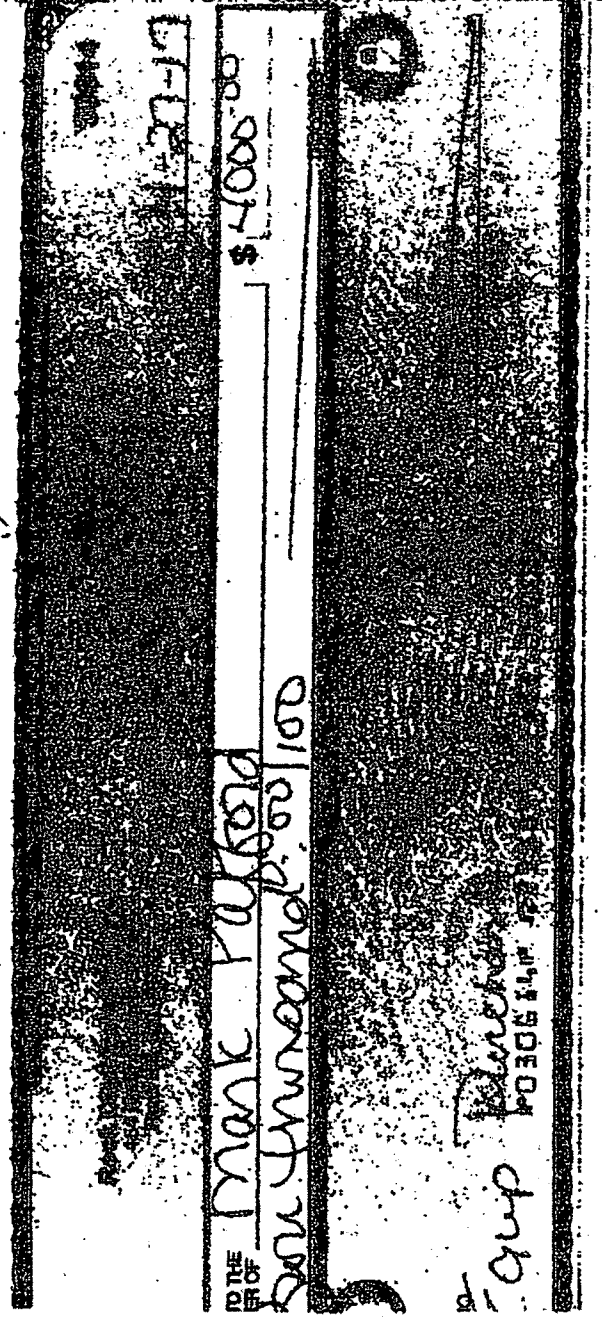
Payable through WFB, N.A.
Chapel Hill, NC
Issued by Electronic Funds Source LLC

⑈9276436 35⑈ ⑆053101561⑆ 8018014137⑈

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Ap[illegible] PM - YORK - COMMON PLEAS - CASE#20[illegible]CP4602487



ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Wells Fargo Bank
Transaction Receipt

Mana

Store #0000327.3	Deposit
Account Number	XXXXXXX1048
CHK 00067	
Number of Checks	1
Total Checks Amount	$3,000.00
Total Deposit	$3,000.00

Deposit will be available:

Date	Amount
07/17/2015	[redacted]
07/10/2015	[redacted]

Pg 1

Transaction # 144 0176
04:03PM 07/17/15
Deposit Credit Date: 07/17/15

Thank you, WHITNEY

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

30265

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
87-7000204

03/04/2016

PAY TO THE ORDER OF Mark Pafford $ 3,000.00

Three thousand and 00/100 DOLLARS

Mark Pafford

Robert W. Lunceford

⑈030265⑈ ⑆253279659⑆ 0000008532⑈

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

Family Trust Bank
ROCK HILL, SC 29730

30251

02/10/2016

PAY TO THE ORDER OF Mark Pafford $3,000.00

Three thousand and 00/100 DOLLARS

Mark Pafford

MEMO

⑈030251⑈ ⑆253279659⑆3100000083532⑈

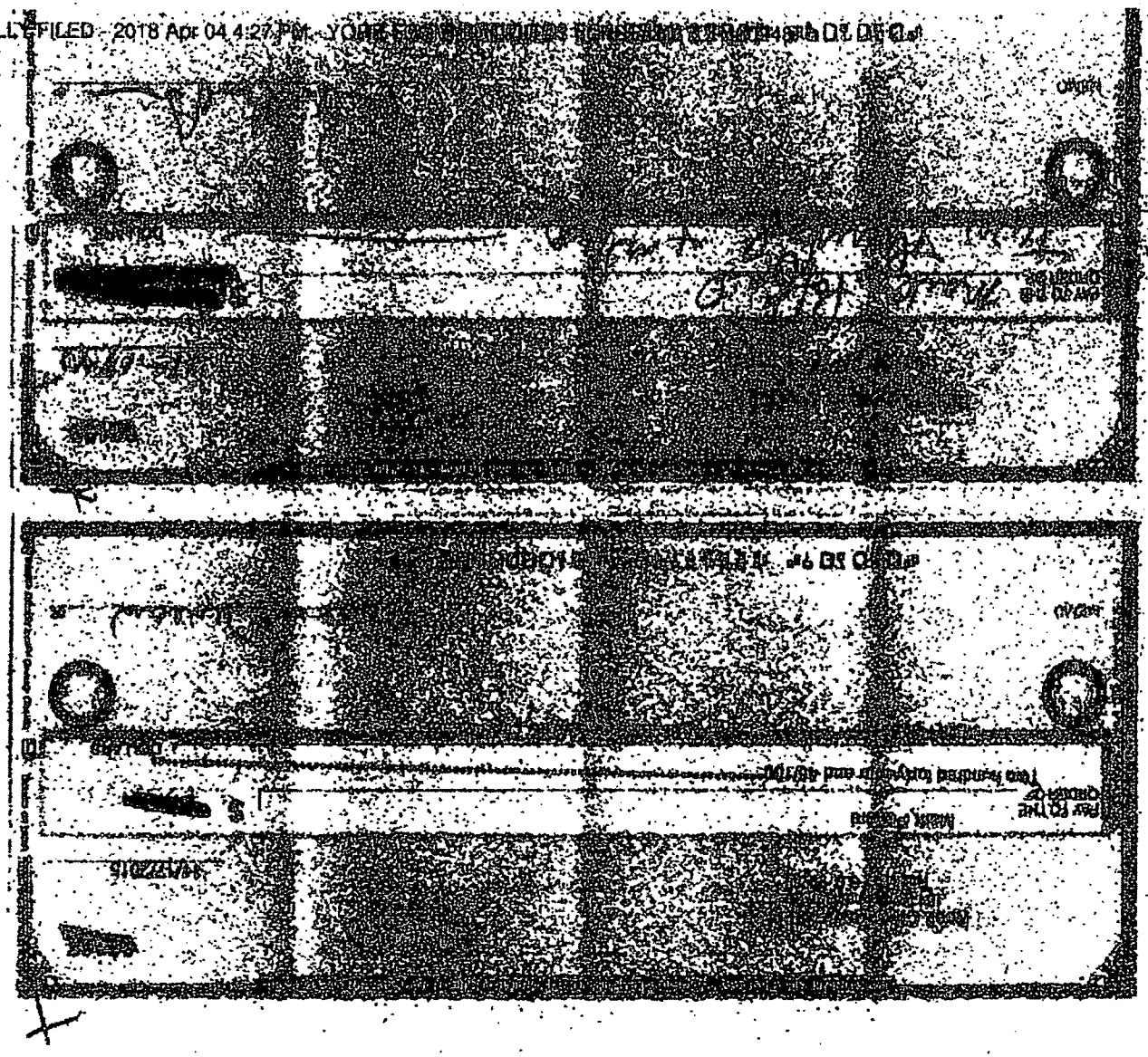
4185503881

https://ob.familytrust.org/MyAccountsV2/PrintCheckImage/32457324?accountIdentifier=0aa3a5d8-71a3-49ca-9d74-e8dae84aab0a 1/1

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK



ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

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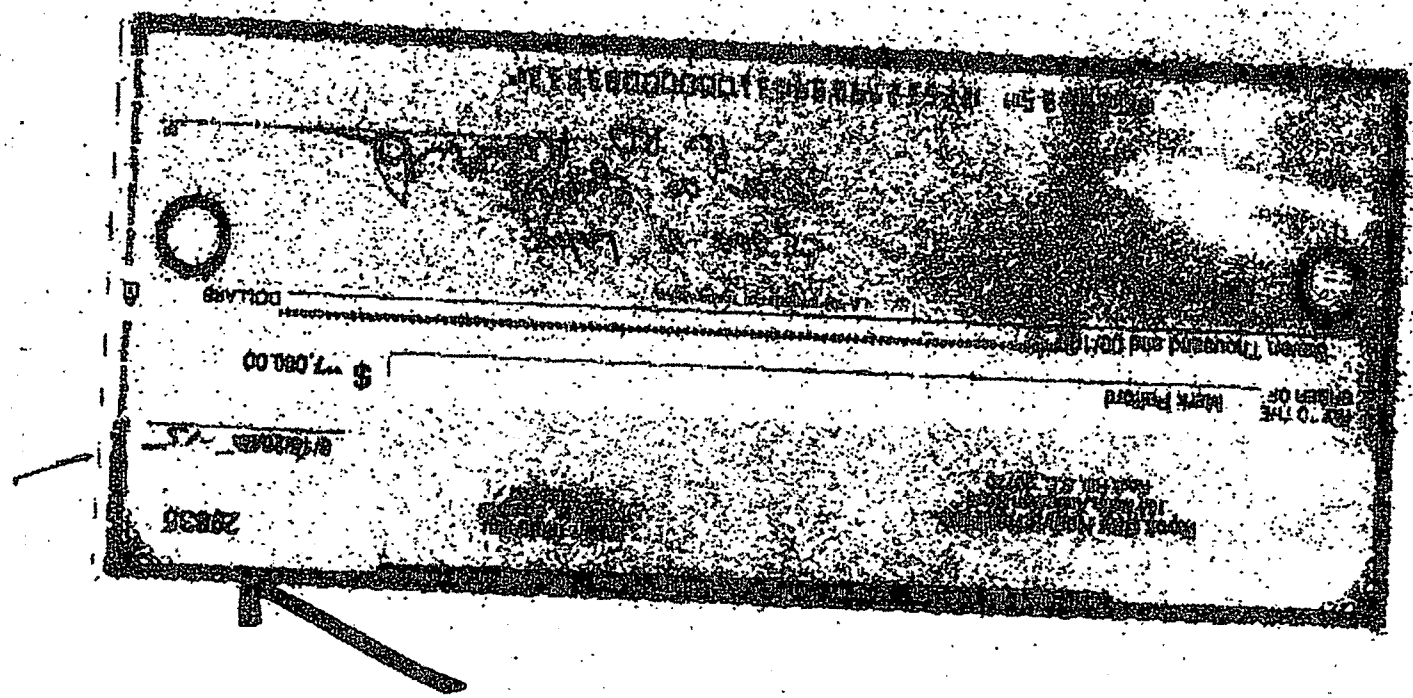

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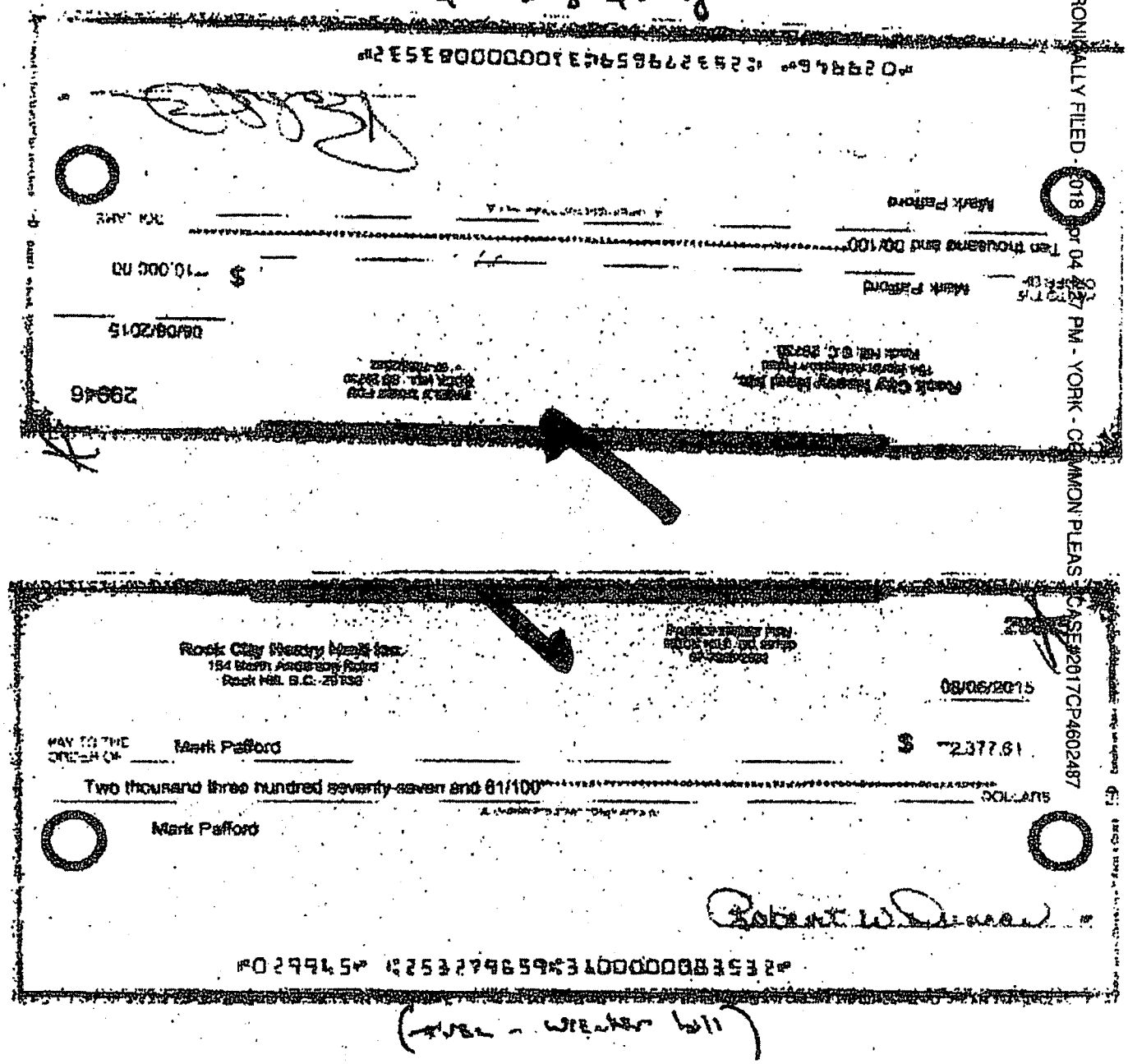
ELECTRONICALLY FILED - 2018 Apr 04 2:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487



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Rock City Heavy Haul Inc. 30301

03/24/2016 Mark Pafford 5,000.00

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Fam Trust Checking xxxx3592 S10 5,000.00

Rock City Heavy Haul Inc. 30301

03/24/2016 Mark Pafford 5,000.00

Fam Trust Checking xxxx3592 S10 5,000.00

10058/10059 074570 (8/15) 100591 Rev 2/14

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

PAY TO THE ORDER OF Mark Pafford $ 3,000.00

Three thousand and 00/100 DOLLARS

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

03/24/2018 Mark Pafford 30302

671.42

Fam Trust Checking xxxx2532 $10

Rock City Heavy Haul Inc.

03/24/2018 Mark Pafford 30302

671.42

671.42

Fam Trust Checking xxxx2532 $10

671.42

10058/10059 574570 (8/16) 10591 Rev 2/14

6548 06 85453 03/19/2018 4555

RETURN POLICY DEFINITIONS

Please advise the Manager about any issues with your stay. Ramada or affiliates may contact you about goods and services unless you call 877-227-3367 or write to Wyndham Worldwide Hotels, Inc. 1 Sylvan Way, Parsippany, NJ 07054 to opt out. View our Ramada Worldwide website about privacy.

Thank you for staying with us.
It was our pleasure to serve you.

~~587.90~~

554.90

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ROBERT W DUNCAN
DBA ROCK CITY TRUCK
6900 BLUE BIRD LN
YORK, SC 29745-6908

1018

DATE 5-12-16

PAY TO THE ORDER OF Marie Pafford $ 20,000

Twenty Thousand two/100 DOLLARS

FOR Purchase Truck

⑈000001018⑈ ⑆053207768⑆ 3984318848⑈

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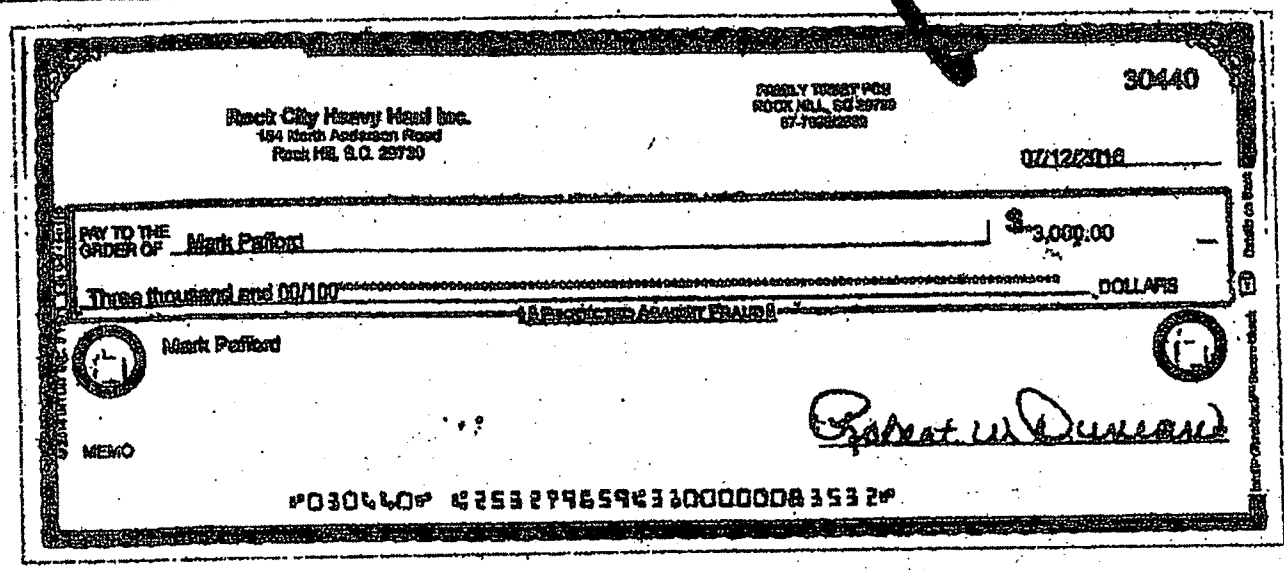
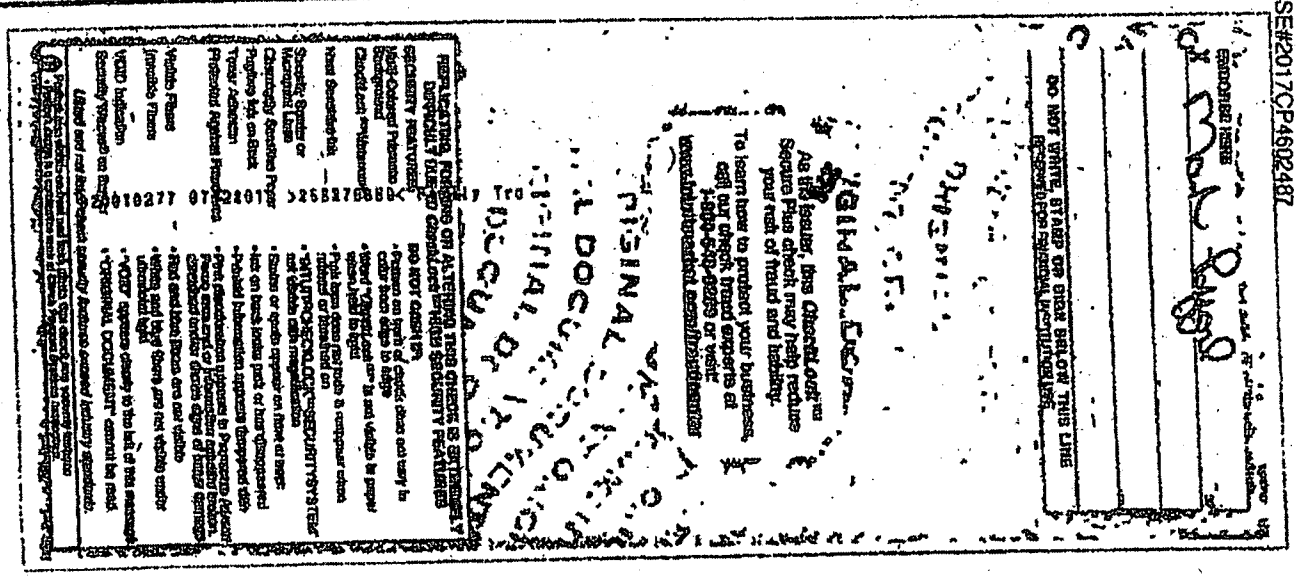
ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

View Check: #030440 Amount: $3,000.00 Date: 7/12/2016 Print Check

Check Front



Check Back



ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

30421

6-22-16

PAY TO THE ORDER OF MARK Pafford $ 5000.00

Five Thousand dollars & 00/100 DOLLARS

MEMO

⑈030421⑈

30420

6-22-16

PAY TO THE ORDER OF Mark Pafford $ 815.24

eight hundred fifteen 24/100 DOLLARS

MEMO

08/20/2016	[redacted]	Check	Mark Pafford	EQUIPMENT PURCHASE	[redacted]	Reconciled
07/12/2016	[redacted]	Check	Mark Pafford	EQUIPMENT PURCHASE	[redacted]	Reconciled
TOTAL					67,500.00	

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ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

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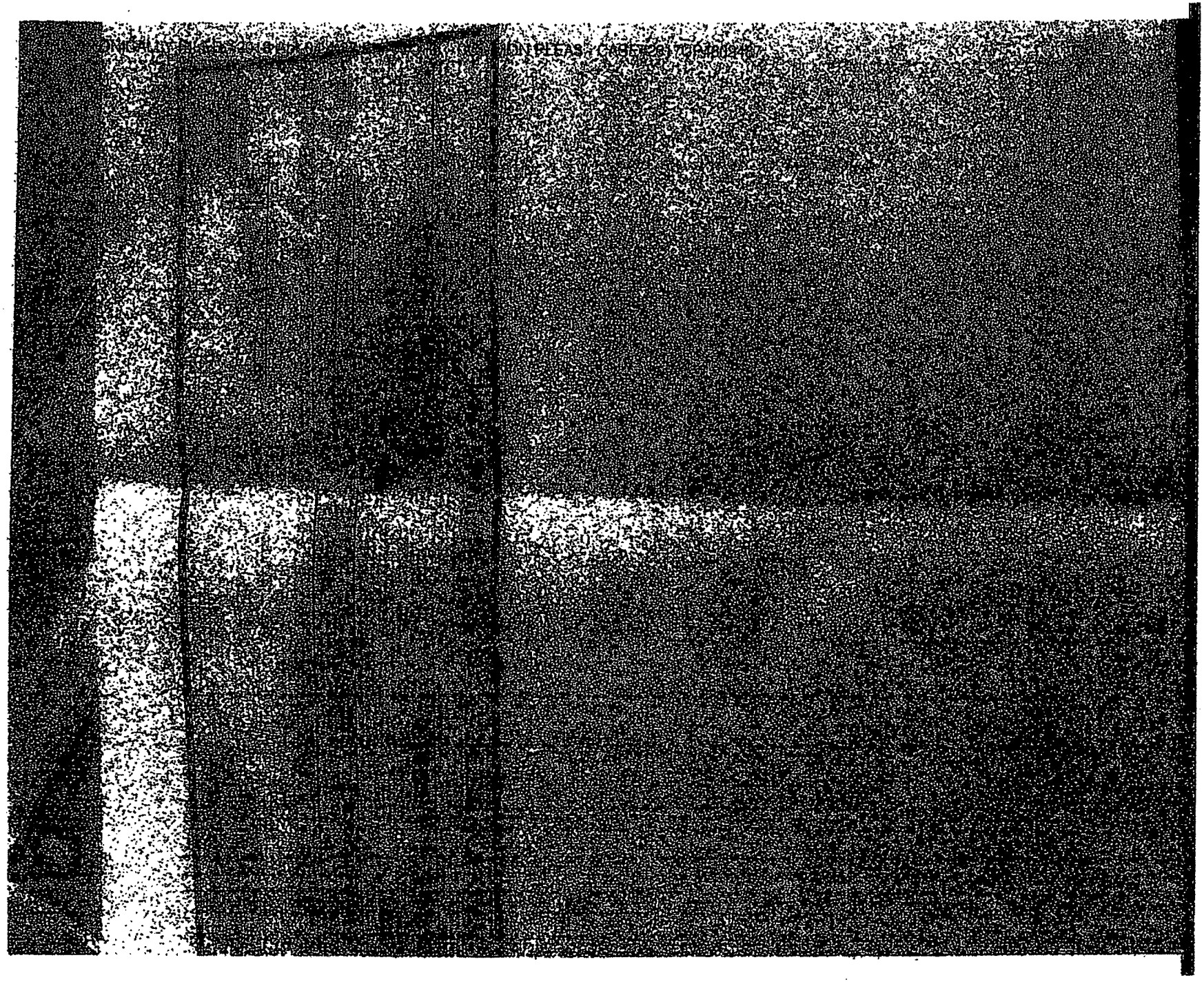
RESPONSE TO REQUEST TO PRODUCE #12



30472

23-16

PAY TO THE ORDER OF Mark Pafford $ 4000.00

Four thousand 00/100 DOLLARS

MEMO Equipment

⑈030472⑈ ⑆241070⑆

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ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

9-16-2016

Rock City Heavy Haul
154 N Anderson Road
Rock Hill SC 29745
803-324-4125

RE: Payment received

I, Mark Pafford, have received the amount of $ 10,000.00 from Rock City Heavy Haul today as a purchase toward equipment for Rock City Heavy Haul.

Signed MP
Date 9 16 14

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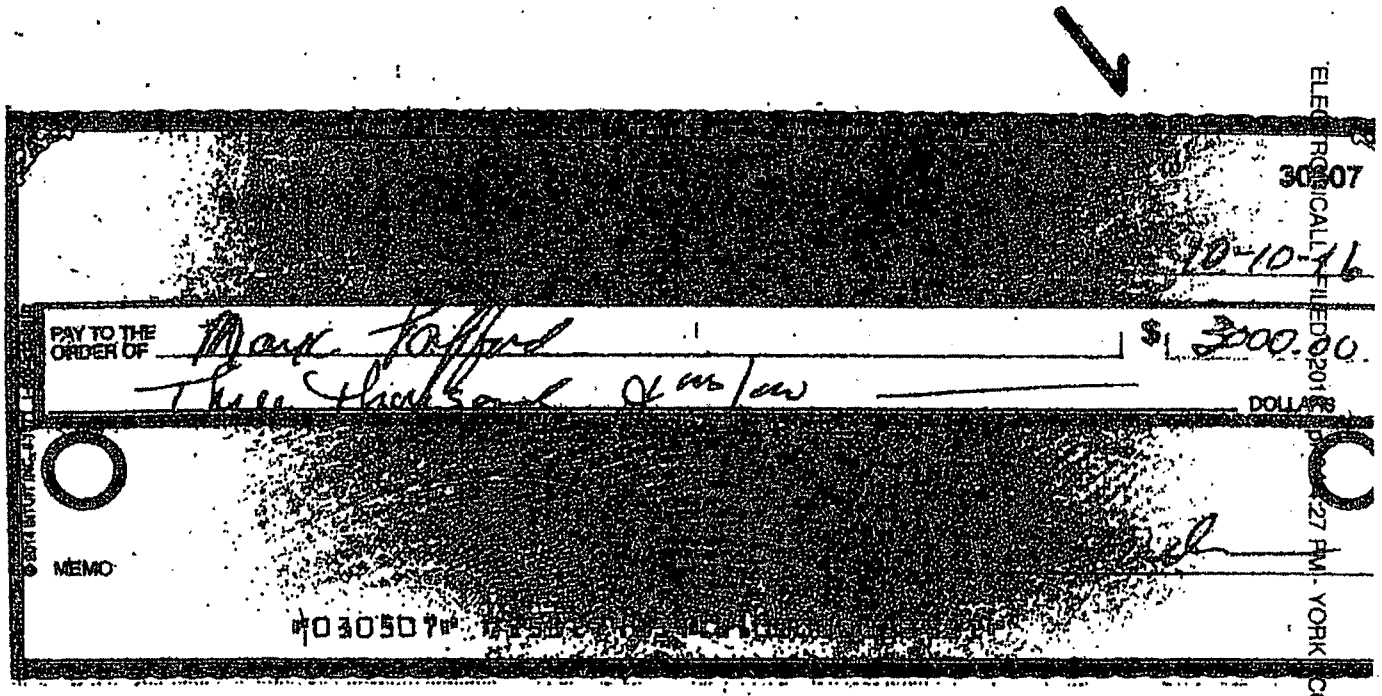

30507

10-10-16

PAY TO THE ORDER OF Mark Tafford $ 300.00

Three Hundred & no/100 DOLLARS

MEMO

⑈030507⑈

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100531

Rev 2/14

ROBERT W DUNCAN
DBA ROCK CITY TRUCK

1162

DATE 10/28/16

PAY TO THE ORDER OF Mark Pafford $ 2000.00

two thousand dollars

FOR

⑈000000116.2⑈ ⑆053207766⑆ 3984118848⑈

30572

12/27/2016

Y TO THE DER OF Mark Pafford $ 4,000.00

Four Thousand and 00/100 DOLLARS

Mark Pafford

MO

⑈030572⑈ ⑆253194955⑆ 0000004553⑈

ELECTRONICALLY FILED - 2018 April 04 4:27 PM - YORK - COMMON PLEAS

Rock City Heavy Haul Inc.
164 North Anderson Road
Rock Hill, S.C. 29730

30551

12-2-2016

PAY TO THE ORDER OF MARK DAFFORD $ 4,000.00

Four Thousand DOLLARS

MEMO Carry Fuels

⑈030551⑈ ⑆253279659⑆ 3100000083532⑈

Rock City Heavy Haul Inc. 30551

12-2-2016
MARK DAFFORD
$ 4000.00

Rock City Heavy Haul Inc. 30551

ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Wells Fargo Bank
Transaction Receipt

Store #0000327.0 Deposit

Account Number	XXXXXX1048
CHK 00367	
Number of Checks	1
Total Checks Amount	$3,000.00
Total Deposit	$3,000.00

Deposit will be available:

Date	Amount
07/17/2015	[redacted]
07/10/2015	[redacted]

Pg 1

Transaction # 144 0176
04:03PM 07/17/15
Deposit Credit Date: 07/17/15

Thank you, WHITNEY

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Rock City Money Management
154 North Anderson Road
Rock Hill, S.C. 29730

07/07/2015

PAY TO THE ORDER OF Mark Pafford $ [redacted]

Six hundred seventy-eight and 57/100 DOLLARS

Mark Pafford

Robert W. Duncan

⑈029874⑈ ⑆253279559⑆ 1000000435 17⑈

Expect Money (Hotel Night Tickets)

Rock City Money Management
154 North Anderson Road
Rock Hill, S.C. 29730

08/04/2015

PAY TO THE ORDER OF Mark Pafford $ [redacted]

Seven hundred eighty-one and 85/100 DOLLARS

Mark Pafford

Robert W. Duncan

⑈029938⑈ ⑆253279559⑆ 1000000081532⑈

Expect Money

(Hotel Night Tickets)

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Rock City Pizza Rock Hill, Inc.
164 North Anderson Road
Rock Hill, S.C. 29730

29835

8/18/2013

PAY TO THE ORDER OF Mark Pafford $ 7,000.00

Seven Thousand and 00/100 DOLLARS

Mark Pafford

⑈029835⑈ ⑆253279659⑆ 3100000083532⑈

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

29946

06/06/2015

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

PAY TO THE ORDER OF Mark Pafford $ **10,000.00

Ten thousand and 00/100 DOLLARS

Mark Pafford

29945

06/06/2015

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

PAY TO THE ORDER OF Mark Pafford $ **2,377.61

Two thousand three hundred seventy-seven and 61/100 DOLLARS

Mark Pafford

⑈029945⑈ ⑆253279659⑆310000008153⑈

29803

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
57-7993/2553

5/29/15

PAY TO THE ORDER OF Marie Pafford $ 1000.00

One thousand and no/100 DOLLARS

A TAMPER RESISTANT TONER AREA A

MEMO

⑈029803⑈ ⑆253279659⑆310000008353 2⑈

4183214045

Paid

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
67-7065/2532

29780

6/21/2015

PAY TO THE ORDER OF Mark Pafford $ **2,000.00

Two Thousand and 00/100********** DOLLARS

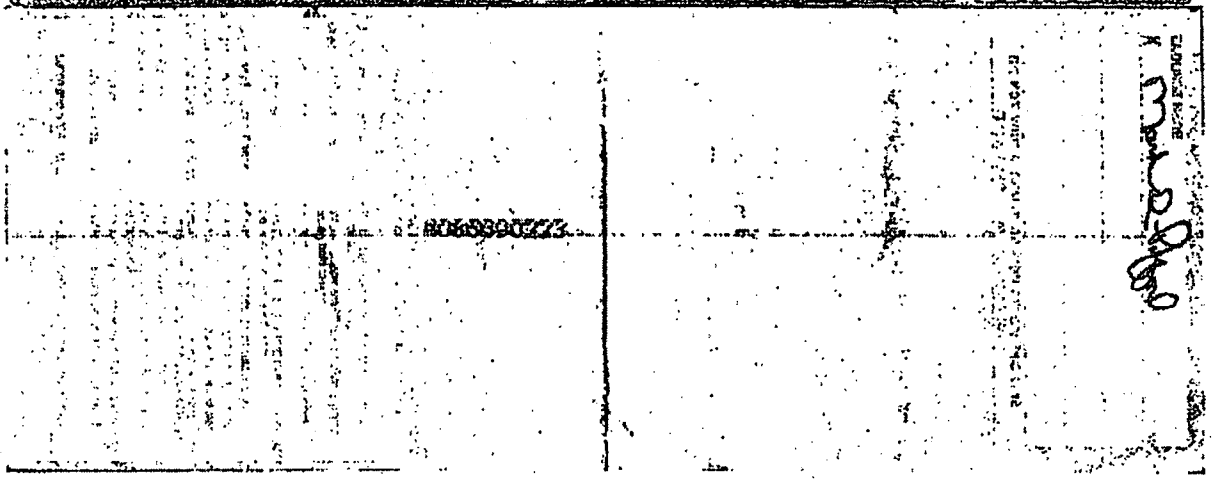
A CASHIER'S CHECK DRAWN ON TOWER AREA A

Mark Pafford

MEMO

Robert W. Duncan

⑈029780⑈ ⑆253279659⑆310000008353 2⑈



ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Rock City Heavy Haul Inc. 29729

Mark Pafford 5/1/2015 2,000.00

Fam Trust Checking x 2,000.00

Rock City Heavy Haul Inc. 29729

Mark Pafford 5/1/2015 2,000.00

Fam Trust Checking x 2,000.00

26068 651315 (10/13) 015711 Rev 11/11

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Rock City Heavy Haul Inc. 29697

Mark Pafford 4/21/2015 2,000.00

Fam Trust Checking x 2,000.00

Rock City Heavy Haul Inc. 29697

Mark Pafford 4/21/2015 2,000.00

Fam Trust Checking x 2,000.00

26068 851315 (10/13) 015711 Rev 11/11

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4[illegible]2487

30478

Rock City Heavy Haul
164 North [illegible]
Rock Hill, S.C. 29730

9/9/2016

PAY TO THE ORDER OF Mark Pafford $ **77.64

Seventy-Seven and 64/100********** DOLLARS

Mark Pafford

MEMO

© 2014 INTUIT INC. # 1[illegible]

30472

8-23-16

PAY TO THE ORDER OF Mark Pafford $ 4000.00

four thousand 00/100 DOLLARS

MEMO Equipment

⑈030472⑈ ⑆[illegible]⑆ [illegible]⑈

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EXHIBIT "D"

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

August 2017

JULY						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

SEPTEMBER						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
		1	2	3	4	5
6 Found truck at Dreamchaser 4th Street	7 Civic Holiday (Canada)	8	9	10	11	12
13	14	15	16 What to Dreamchaser Out — truck caught	17 Hire Foster to do a Claim / Delivery on truck	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

ACCOUNT: 140672

BRANCH: 1

POS Discount Summary by Driver by Truck Stop

2/1/15 THRU 2/28/15

RUN DATE: 1/16/18

UNIT	EFS TS #	TRUCK STOP NAME	CITY	STATE	TOTAL GALLONS	GROSS FUEL COST	GROSS AVG PPG	NET FUEL COST	NET AVG PPG	POS DISCOUNT
DRIVER:	RAFFORD M									
37	8414	LOVES TRAVEL STOP #354	THOMSON	GA	67.92	189.42	2.7889	189.42	2.7889	0.00
37	7845	LOVES TRAVEL STOP #507	SALISBURY	NC	81.32	238.18	2.9289	238.18	2.9289	0.00
37	2911	PETRO BORDENTOWN	BORDENTOWN	NJ	109.88	334.97	3.0491	321.79	2.9291	-13.18
37	8530	TREXLER PLAZA	ALLENTOWN	PA	77.78	245.72	3.1592	245.72	3.1592	0.00
37	5704	TA GREENCASTLE	GREENCASTLE	PA	116.82	366.69	3.1389	352.67	3.0189	-14.02
37	3978	LOVES TRAVEL STOP #333	FORT MILL	SC	516.11	1,449.99	2.8095	1,449.99	2.8095	0.00
37	4872	LOVES TRAVEL STOPS #436	RUTHER GLEN	VA	157.70	446.02	2.8596	446.02	2.8596	0.00
37	8340	TACOME-WA CFN #2038	TACOMA	WA	73.23	192.52	2.6290	175.98	2.4031	-16.54
37	8165	PILOT #503	MORGANTOWN	WV	143.11	457.80	3.1989	446.35	3.1189	-11.45
DRIVER		TOTALS			1,363.88	3,921.31	2.8964	3,865.12	2.8559	-56.19

TSA054

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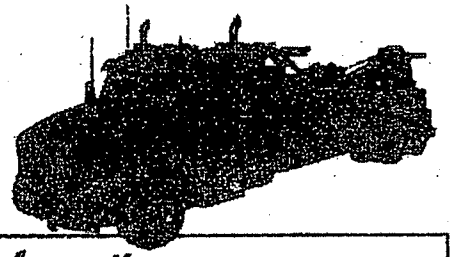
Rock City Truck Service Inc

154 North Anderson Road
Rock Hill, SC 29730
803-324-4141 OFFICE
803-324-2145 FAX
Rockcitytruckservice@outlook.com

Invoice

Date	Invoice #
6/15/2016	2809



Customer
MARK PAFFORD'S 2535 FERGUSON DR ROCK HILL SC 29730

Truck Information		
Truck #	Trailer #	Reference #
2005 PETER...		

Item	Description	Quanti...	Rate	Amount
Labor	SHOP LABOR REPAIR BACK OF CAB	12.4	95.00	1,178.00
Labor	SHOP LABOR REMOVE FRONT FENDERS AND REPLACE WITH NEW FENDERS	4.5	95.00	427.50
PARTS	LEFT FRONT FENDER PETERBILT 379		387.24	387.24T
PARTS	RIGHT FRONT FENDER PETERBILT 379		378.14	378.14T
Labor	REPLACE FRONT BUMPER	2.1	95.00	199.50
PARTS	NEW PETERBILT 379 BUMPER	1	527.14	527.14T
Labor	SHOP LABOR REMOVE WHEELS FROM TRUCK AND SAND FRAME,REARENDS AND AXLES	7.3	95.00	693.50
PARTS	CHASSIS BLACK PAINT	1	128.47	128.47T
PARTS	66864 BRAKE DRUM	4	134.84	539.36T
PARTS	4709ES2 BRAKE SHOES	4	48.17	192.68T
PARTS	370003A SEALS	4	46.88	187.52T
Labor	SHOP LABOR INSTALL NEW BRAKES AND SEALS	8	95.00	760.00
PARTS	PAINT AND SUPPLIES FOR PAINTING FENDERS	1	408.47	408.47T
PARTS	PAINT FOR REAR OF CAB	1	157.14	157.14T
Labor	FREDS TRUCK DETAIL BULK HEAD POLISHED		600.00	600.00
Labor	FREDS TRUCK DETAIL WHEELS AND TANK AND CROWN POLISHED		1100.00	1,100.00
	Sales Tax		7.00%	203.43

Total	$8,068.09

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Rock City Heavy Haul, Inc.

Fam Trust Checking xxxx3532 S10

Date	Ref No.	Type	Payee	Account	Memo	Payment	Deposit	Class	Stat	Balance
01/06/2016	30187	Check	Mark Pafford	Expense Reimbursement		$489.61			C	n/a
12/22/2015	30161	Check	Mark Pafford	EQUIPMENT PURCHASE		$5,000.00			R	n/a
11/19/2015	30109	Check	Mark Pafford	EQUIPMENT PURCHASE		$2,000.00			R	n/a
11/17/2015	30107	Check	Mark Pafford	Expense Reimbursment		$244.45			R	n/a
10/19/2015	30081	Check	Mark Pafford	EQUIPMENT PURCHASE		$5,000.00			R	n/a
10/07/2015	30065	Check	Mark Pafford	Expense Reimbursement		$2,956.95			R	n/a
09/21/2015	30031	Check	Mark Pafford	EQUIPMENT PURCHASE		$1,000.00			R	n/a
9-25-	Cash					2000.00				
08/06/2015	29946	Check	Mark Pafford	Equipment		$10,000.00			R	n/a
08/05/2015	29945	Check	Mark Pafford	Expense Reimbursment		$2,377.61		truck 52	R	n/a
08/04/2015	29938	Check	Mark Pafford	Expense Reimbursment		$781.85		202098	R	n/a
07/28/2015		Debit Check	Mark Pafford	Purchased Equipment	Mark Pafford	$2,000.00	Cashiers Check		R	n/a
n/3' 07/16/2015	29891	Check	Mark Pafford	petty cash		$1,000.00	Gary Cash		R	n/a
07/14/2015		Debit Check	Mark Pafford	Loan Repay - Robert Duncan		$3,000.00			R	n/a
07/07/2015	29874	Check	Mark Pafford	Expense Reimbursment		$678.37			R	n/a
06/29/2015		Debit Check	Mark Pafford	Permits and Escorts	purchased equipment	$2,500.00	Cashiers check		R	n/a
06/16/2015	29836	Check	Mark Pafford	Expense Reimbursment		$492.09			R	n/a
06/16/2015	29835	Check	Mark Pafford	Equipment	truck	$7,000.00			R	n/a
05/29/2015	29803	Check	Mark Pafford	Purchased Equipment	KW Trailer	$1,000.00			R	n/a
05/21/2015	29781	Check	Mark Pafford	Expense Reimbursment	Expense	$138.34		202020	R	n/a
05/21/2015	29780	Check	Mark	Equipment		$2,000.00			R	n/a

1/2

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			Pafford					
05/05/2015	29735	Check	Mark Pafford	Equipment	$494.87		R	n/a
05/01/2015	29729	Check	Mark Pafford	Equipment	$2,000.00		R	n/a
04/21/2015	29697	Check	Mark Pafford	Purchased Equipment	$2,000.00		R	n/a
03/27/2015	29614	Check	Mark Pafford	Equipment	$773.46		R	n/a
02/20/2015	29549	Check	Mark Pafford	Expense Reimbursment	$346.69	201915	R	n/a
02/10/2015	29516	Check	Mark Pafford	Expense Reimbursment	$20.75		R	n/a

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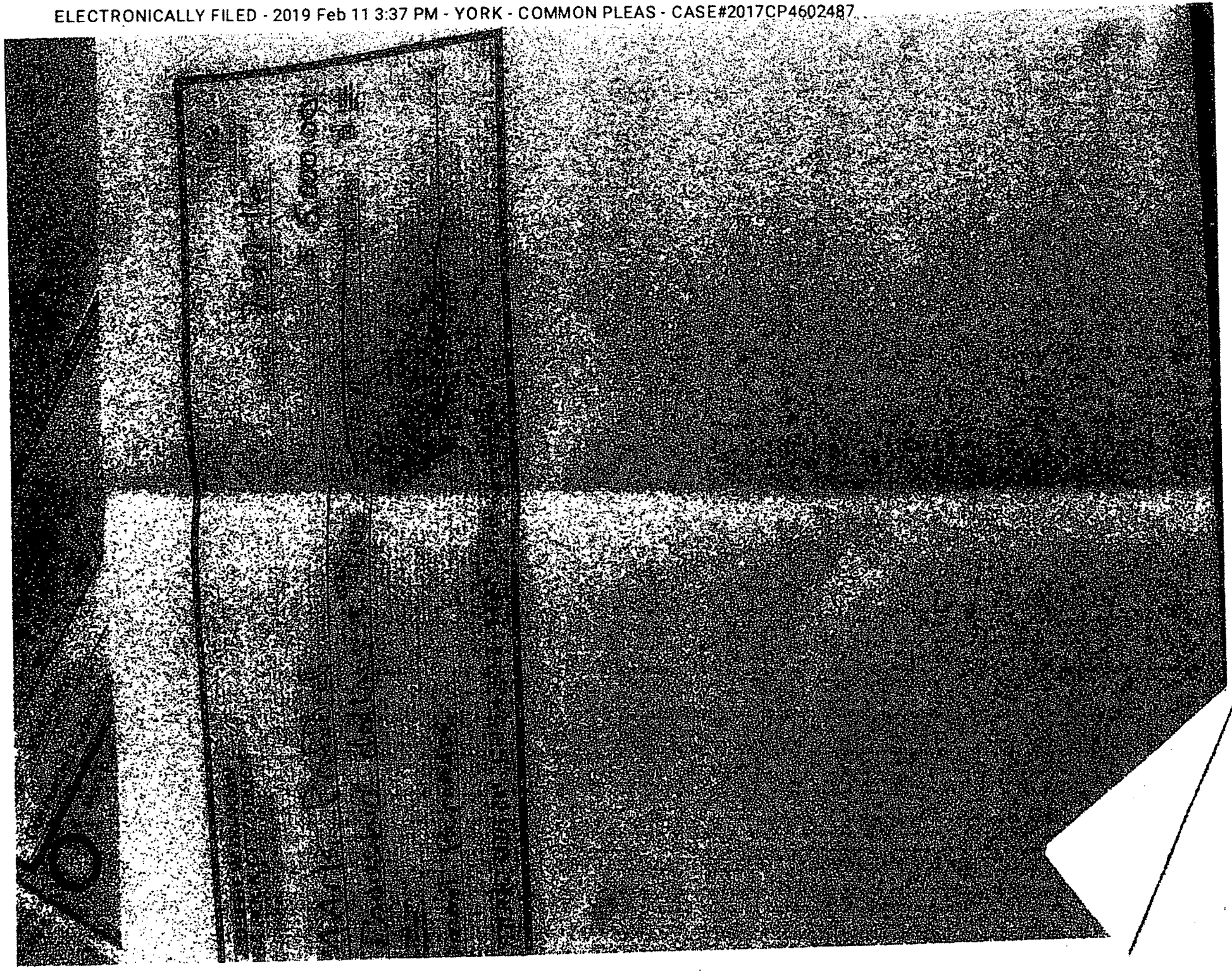

08/20/2016	[redacted]	Check	Mark Pafford	EQUIPMENT PURCHASE [redacted]	Reconciled
07/12/2016	[redacted]	Check	Mark Pafford	EQUIPMENT PURCHASE [redacted]	Reconciled
TOTAL				67,500.00	

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Print Check

View Check: #030440 Amount: $3,000.00 Date: 7/12/2016

Check Front

FAMILY TRUST FCU
ROCK HILL, SC 29730
57-7558/2532

30440

Rock City Heavy Haul Inc.
164 North Anderson Road
Rock Hill, S.C. 29730

07/12/2016

PAY TO THE ORDER OF Mark Pafford $ 3,000.00

Three thousand and 00/100 DOLLARS

IS PROTECTED AGAINST FRAUD

Mark Pafford

MEMO

Robert W Duncan

⑈030440⑈ ⑆253279659⑆310000008353 2⑈

Check Back

ENDORSE HERE

Mark Pafford

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ORIGINAL DOCUMENT

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Chemically Sensitive Paper
Positive Ink on Back
Toner Adhesion
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Visible Fibers
Invisible Fibers
VOID Indication
Security Warning on Back

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• Ink on back bleeds pink or has disappeared
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⑆018277 07 2201⑈ >253279659⑆ Family Tru

United and not itself Check security features exceed industry standards.

Please look closely on front and back check for security features. If there is a contradiction one of Chek Prevent Systems [illegible]

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30421

Rock City Heavy Haul Inc.
154 North [illegible]
Rock Hill, S.C.

6-22-16

PAY TO THE ORDER OF MARK Pafford $ 5000.00

Five Thousand dollars & 00/100 DOLLARS

MEMO

30420

Rock City Heavy Haul Inc.
154 North [illegible]
Rock Hill, S.C.

6-22-16

PAY TO THE ORDER OF Mark Pafford $ 815.24

Eight hundred fifteen 24/100 DOLLARS

MEMO

ROBERT W DUNCAN
DBA ROCK CITY TRUCK
5300 BLUE BIRD LN
YORK, SC 29745-9608

1018
67-776/532 9375
3984118848

DATE 5-12-16

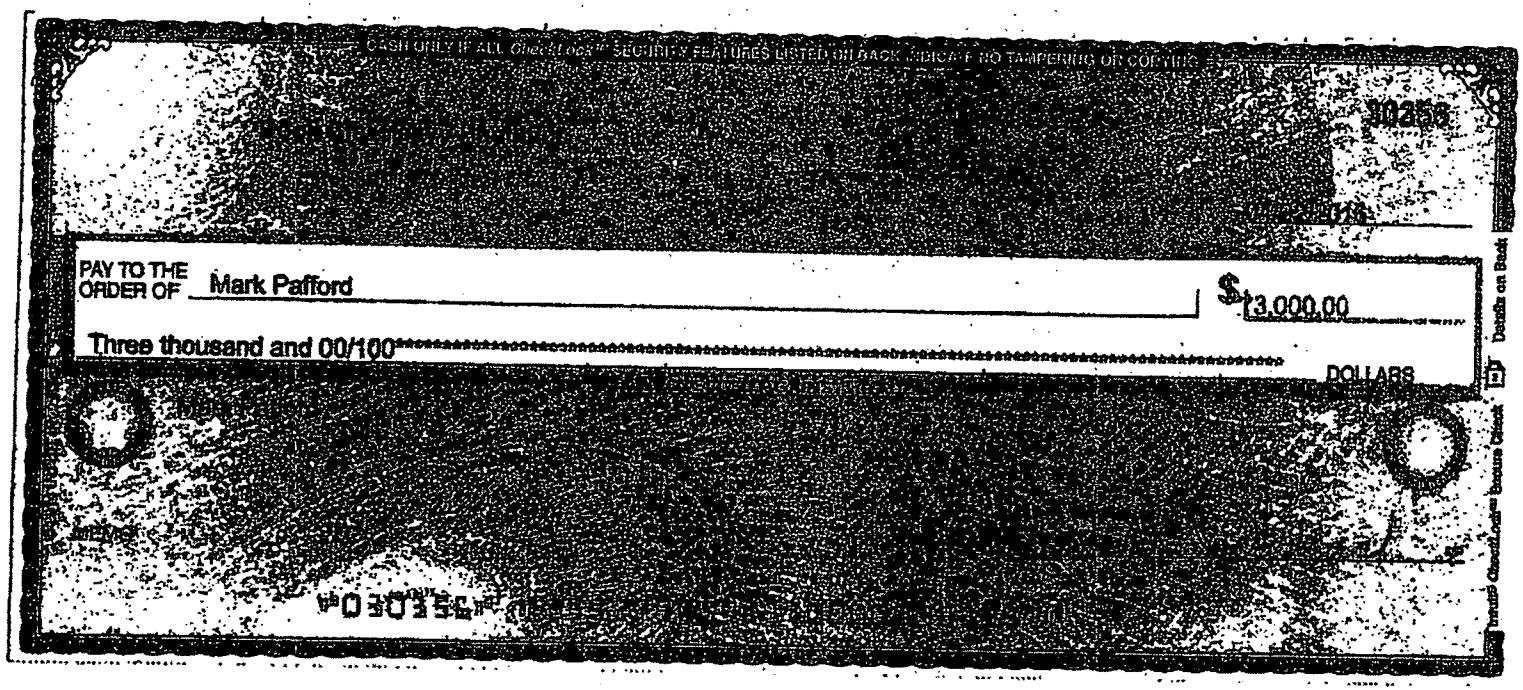
PAY TO THE ORDER OF Marie Pafford $ 20,000

Twenty Thousand +NO/100 DOLLARS

Wells Fargo Bank, N.A.
South Carolina
wellsfargo.com

FOR Purchase Truck

⑈000001018⑈ ⑆053207768⑆ 3984118848⑈



CASH ONLY IF ALL Checkfree SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

30256

016

PAY TO THE ORDER OF Mark Pafford $ 3,000.00

Three thousand and 00/100********** DOLLARS

Detach on Back

Transit Checkfree Secure Check

⑈030356⑈

03/24/2016 Mark Pafford 30302

671.42

Fam Trust Checking xxxx3532 $10 671.42

Rock City Heavy Haul Inc.

03/24/2016 Mark Pafford 30302

671.42

Fam Trust Checking xxxx3532 $10 671.42

10058/10069 674870 (6/15) 100691 Rev 2/14

6548 06 85453 03/19/2016 4555

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It was our pleasure to serve you.

~~589.90~~

554.90

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30301

Rock City Heavy Haul Inc.

03/24/2016 Mark Pafford 5,000.00

Fam Trust Checking xxxx3532 $10 5,000.00

30301

Rock City Heavy Haul Inc.

03/24/2016 Mark Pafford 5,000.00

Fam Trust Checking xxxx3532 $10 5,000.00

10050/10059 874570 (6/15)

100591

Rev 2/14

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30265

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST FCU
ROCK HILL, SC 29730
87-7985[illegible]

03/04/2016

PAY TO THE ORDER OF Mark Palford $ 3,000.00

Three thousand and 00/100 DOLLARS

Mark Palford

Robert W. Linder

⑈030265⑈ ⑆253279669⑆310000008353 2⑈

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Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

FAMILY TRUST BANK
ROCK HILL, SC 29730
87-2425/2332

30251

02/19/2016

PAY TO THE ORDER OF Mark Pafford $3,000.00

Three thousand and 00/100 DOLLARS

Mark Pafford

MEMO

Robert W. Duncan Jr.

⑈030251⑈ ⑆253279659⑆3 8000000083532⑈

4185503881

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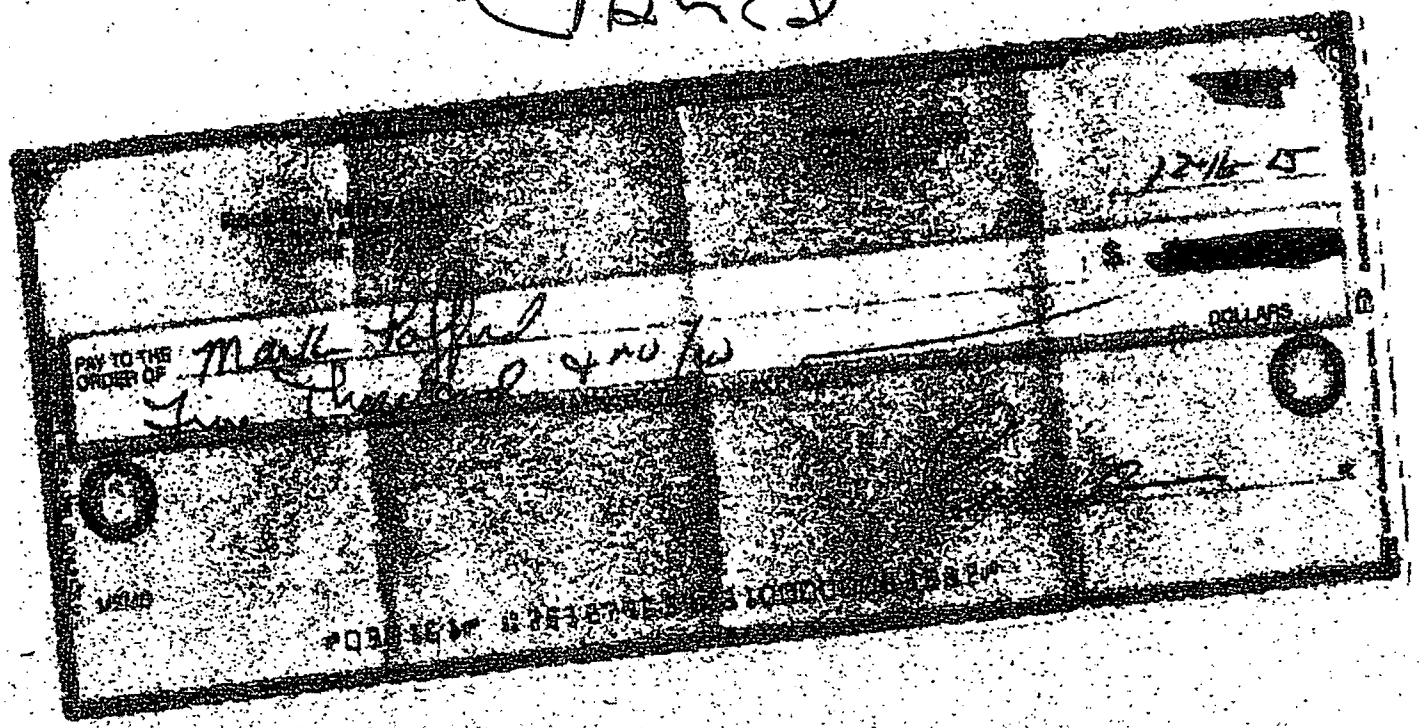
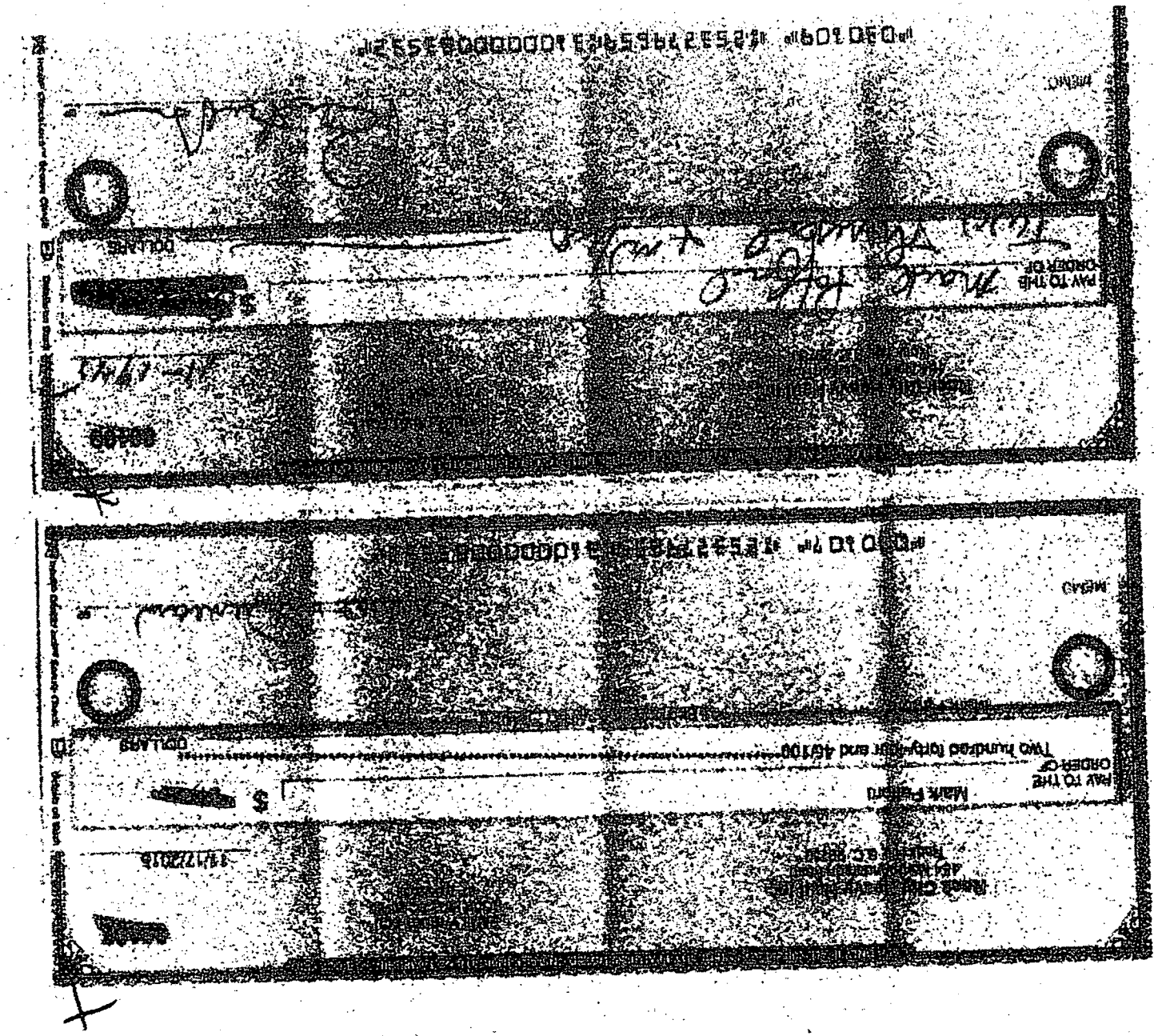
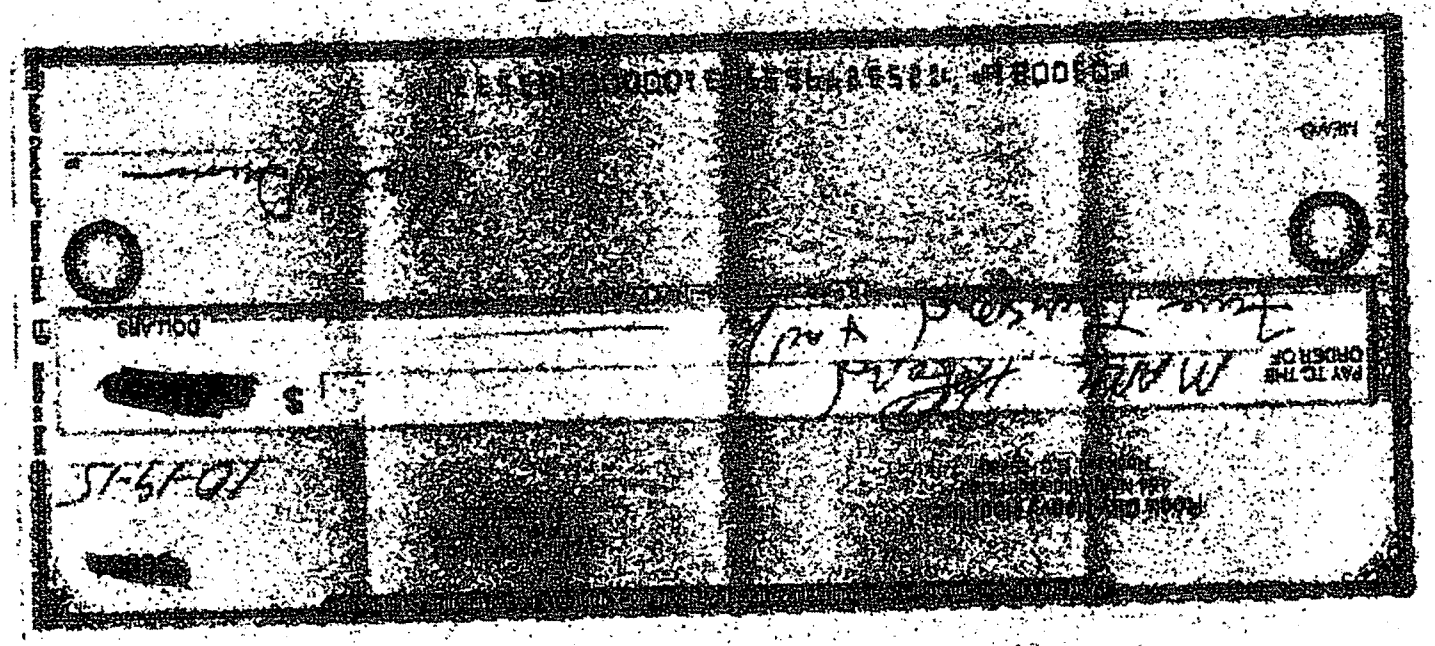
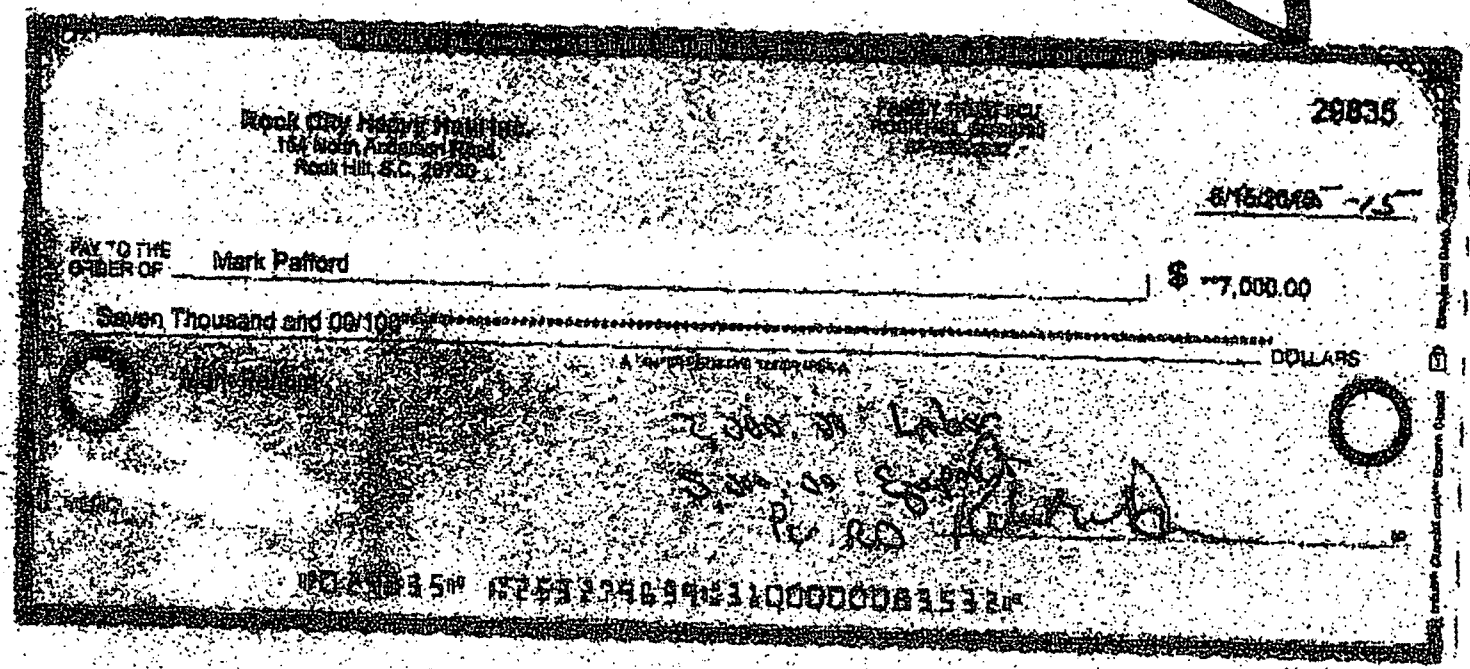



PAY TO THE ORDER OF
Two hundred forty-four and 46/100
DOLLARS
Mark Fleming
$
PAY TO THE ORDER OF
DOLLARS
$


DOLLARS
PAY TO THE ORDER OF
MEMO



Rock Clay Heavy Haulers
164 North Anderson Road
Rock Hill, S.C. 29730

29835

6/15/2018

PAY TO THE ORDER OF Mark Pafford $ **7,000.00

Seven Thousand and 00/100 DOLLARS

Mark Pafford

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Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

29946

08/06/2015

PAY TO THE ORDER OF Mark Pafford $ **10,000.00

Ten thousand and 00/100 DOLLARS

Mark Pafford

FAMILY TRUST FCU
ROCK HILL, SC 29730
57-7000/2532

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

⑈029946⑈ ⑆253279659⑆310000008353 2⑈

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

29945

08/06/2015

PAY TO THE ORDER OF Mark Pafford $ **2,377.61

Two thousand three hundred seventy-seven and 61/100 DOLLARS

Mark Pafford

FAMILY TRUST FCU
ROCK HILL, SC 29730
57-7000/2532

Robert W. Duncan

⑈029945⑈ ⑆253279659⑆310000008353 2⑈

(gas - water bill)

30614

Rock City

4-27-17

TO THE ER OF Mark Pafford $ 4000.00

Four thousand & 00/100 DOLLARS

Gup Purchase

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Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

30610

4/11/2017

PAY TO THE ORDER OF Mark Pafford $ **4,000.00

Four Thousand and 00/100********** DOLLARS

Mark Pafford

MEMO

Robert W Duncan

⑈030610⑈ ⑆253279659⑆3100000083572⑈

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Robert W Duncan
DBA Rock City Truck
5300 Bluebird Lane
York SC 29745

WELLS FARGO BANK, NA
67-776/832

1301

2/23/2017

PAY TO THE ORDER OF MARK PAFFORD $ **3,000.00

Three Thousand and 00/100********** DOLLARS

MARK PAFFORD

MEMO

⑈001301⑈ ⑆053207766⑆ 3984118848⑈

EFS
1104 Country Hills Dr., Suite 600
Ogden, UT 84403

66-156/531

CHECK NUMBER 92764363

DATE 2-27-17

PAY TO THE ORDER OF Mark Pafford

THE SUM OF two thousand 00/100 U.S. DOLLARS $ 3000.00

DRIVER'S LICENSE Number 142543 State

MONEYCODE® 140672 746 1850 000

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Chapel Hill NC
Issued by Electronic Funds Source LLC

⑈92764363⑈ ⑆053101564⑆ 8018064637⑈

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1348

Robert W. Duncan
Oak Ridge Trust
200 Bishop Lane
York, SC 29745

1/19/2017

$ **4,000.00

PAY TO THE ORDER OF MARK PAFFORD

Four Thousand and 00/100********** DOLLARS

MARK PAFFORD

MEMO

⑈001348⑈ ⑆053207766⑆ 3984118848⑈

© 2011 INTUIT INC. # 765 1-800-432-8810

30572

Rock City Party Hall LLC
164 North [illegible]
Rockhill, [illegible]

12/27/2016

PAY TO THE ORDER OF Mark Pafford $ **4,000.00

Four Thousand and 00/100********** DOLLARS

Mark Pafford

MEMO

ELECTRONICALLY FILED - 2016 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

30551

FAMILY TRUST FCU
ROCK HILL, SC 29730
803-366-2532

Rock City Heavy Haul Inc.
154 North Anderson Road
Rock Hill, S.C. 29730

12-2-2016

PAY TO THE ORDER OF MARK DAFFORD $ 4,000.00

Four Thousand DOLLARS

PROTECTED AGAINST FRAUD

MEMO Gary Funk

⑈030556⑈ ⑆253279659⑆3100000083532⑈

30551

Rock City Heavy Haul Inc.

12-2-2016
MARK DAFFORD
$ 4000.00

30551

Rock City Heavy Haul Inc.

100591

Rev 2/14

100591/10050 874570 (6/15)

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RESPONSE TO REQUEST TO PRODUCE #14

ROBERT W DUNCAN
DBA ROCK CITY TRUCK

1162

DATE 10/28/16

PAY TO THE ORDER OF Mark Pafford $ 2000.00

two thousand 00 DOLLARS

FOR

⑈0000001662⑈ ⑆053207766⑆ 3984168848⑈

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30507

10-10-16

PAY TO THE ORDER OF Mark Toffed $ 3000.00

Three thousand & no/100 DOLLARS

MEMO

⑈030507⑈

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ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2019CV00248

30491

9/14/14

PAY TO THE ORDER OF Mark Pafford $ 3000.00

Three Thousand 00/100 DOLLARS

Business Checking Secure Check

MEMO

© 2014 INTUIT INC.

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RESPONSE TO REQUEST TO PRODUCE #9

#129

STATE OF SOUTH CAROLINA

CERTIFICATE OF TITLE

OF A VEHICLE

VEHICLE ID NUMBER	YEAR	MAKE	MODEL	NEW/USED
1TKS00517WM101139	1998	TLKG	FLIP A	USED

BODY STYLE	DATE ISSUED	ODOMETER	WEIGHT	TITLE NUMBER
TL	11-20-2007		2500	770120183922919

VEHICLE BRAND(S)
ACTUAL MILEAGE

FULL NAME OF OWNER(S)
PAFFORD, MARK GILES
1258 OAKDALE RD
ROCK HILL SC 297308707

CUSTOMER NUMBER: 024947361

THE SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE PERSON HEREIN IS REGISTERED BY THIS DEPARTMENT AS THE LAWFUL OWNER OF THE VEHICLE DESCRIBED SUBJECT TO THE LIENS, IF ANY, HEREIN SET FORTH.

MARCIA S. ADAMS
EXECUTIVE DIRECTOR

MARK SANFORD
GOVERNOR

038705834

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South Carolina Department of Motor Vehicles

BILL OF SALE

(Must be Typed or Printed in Black Ink)

4031
(Rev. 02/12)

FOR DEPARTMENT USE ONLY:
Check One:
☐ Purchase License Plate
☐ Transfer License Plate

I, Mark G. Pafford (Seller)
2535 Ferguson Drive (Street) Rock Hill (City) SC (State) 29730 (Zip Code)

state that on the 10th day of October Yr. 2014 The following vehicle:
MAKE Kenworth MODEL W900 BODY TYPE Tractor YEAR 2003
VEHICLE IDENTIFICATION NO. 1XKWDB9X03J892961 LICENSE NO. _____
was sold to Rock City Heavy Haul (Buyer)
154 North Anderson Rd (Street) Rock Hill (City) SC (State) 29730 (Zip Code)

And the above vehicle is free of all liens and encumbrances in the buyer's name except:

(List here any mortgages, liens, or encumbrances)

Sale price of vehicle $ 38,500.00
Less trade-in $ 38,500.00
Taxable Total $ 0

Federal and State law requires that you state the mileage in connection with transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

I state that the odometer now reads Exempt (no tenths) miles and to the best of my knowledge that it reflects the **ACTUAL MILEAGE** of the vehicle described herein. **UNLESS** one of the following statements is checked.

STOP! DO NOT check one of the following unless it applies.

_____ 1. I hereby certify that to the best of my knowledge the odometer reading reflects the amount of mileage in EXCESS of its mechanical limits.

_____ 2. I hereby certify that the odometer reading is NOT the actual mileage. WARNING: ODOMETER DISCREPANCY.

WARNING: Federal and state law requires that you state the mileage in connection with the transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

Signature(s) of Buyer(s) 10-8-16 Date — Mark G. Pafford 10/8/16 Signature(s) of Seller(s) Date

Robert Hand Print Name(s) of Buyer(s) — Hand Print Name(s) of Seller(s)

Return to: **South Carolina Department of Motor Vehicles**
PO Box 1498
Blythewood, SC 29016-0024

ANY ALTERATIONS OR ERASURE VOIDS THIS DOCUMENT.
ORIGINALS MUST BE SUBMITTED TO THE DEPARTMENT.

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RESPONSE TO REQUEST TO PRODUCE #12

REFERENCE COPY - DO NOT FILE

Form **1040** U.S. Individual Income Tax Return **2016** OMB No. 1545-0074 IRS Use Only - Do not write or staple in this space.

For the year Jan. 1 - Dec. 31, 2016, or other tax year beginning , 2016, ending , 20 See separate instructions.

Your first name and initial: ROBERT W	Last name: DUNCAN	Your social security number: [redacted]
If a joint return, spouse's first name and initial: NANCY G	Last name: DUNCAN	Spouse's social security number: [redacted]
Home address (number and street). If you have a P.O. box, see instructions.: 5300 BLUEBIRD LANE	Apt. no.	⚠ Make sure the SSN(s) above and on line 6c are correct.
City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions).: YORK, SC 29745		Presidential Election Campaign Check here if you, or your spouse if filing jointly, want $3 to go to this fund. Checking a box below will not change your tax or refund.
Foreign country name	Foreign province/state/county	Foreign postal code

REFERENCE COPY - DO NOT FILE

Filing Status Check only one box.

1 ☐ Single
2 ☒ Married filing jointly (even if only one had income)
3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▶
4 ☐ Head of household (with qualifying person). (See instr.) If the qualifying person is a child but not your dependent, enter this child's name here. ▶
5 ☐ Qualifying widow(er) with dependent child

Exemptions

6a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a
b ☒ Spouse

Boxes checked on 6a and 6b: 2

c Dependents:

(1) First name Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) ✓ if child under age 17 qualifying for child tax credit (see instructions)
			☐
			☐
			☐
			☐

If more than four dependents, see instructions and check here ▶ ☐

No. of children on 6c who: ● lived with you ● did not live with you due to divorce or separation (see instructions)

Dependents on 6c not entered above

Add numbers on lines above ▶ 2

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d Total number of exemptions claimed

Income

Attach Form(s) W-2 here. Also attach Forms W-2G and 1099-R if tax was withheld.

If you did not get a W-2, see instructions.

7	Wages, salaries, tips, etc. Attach Form(s) W-2	7	19,900
8a	Taxable interest. Attach Schedule B if required	8a	66
b	Tax-exempt interest. Do not include on line 8a. 8b		
9a	Ordinary dividends. Attach Schedule B if required	9a	
b	Qualified dividends 9b		
10	Taxable refunds, credits, or offsets of state and local income taxes	10	
11	Alimony received	11	
12	Business income or (loss). Attach Schedule C or C-EZ	12	
13	Capital gain or (loss). Attach Schedule D if required. If not required, check here ▶ ☐	13	
14	Other gains or (losses). Attach Form 4797	14	
15a	IRA distributions 15a b Taxable amount	15b	24,663
16a	Pensions and annuities 16a b Taxable amount	16b	
17	Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E	17	
18	Farm income or (loss). Attach Schedule F	18	
19	Unemployment compensation	19	
20a	Social security benefits 20a 36,514 b Taxable amount	20b	22,053
21	Other income. List type and amount	21	
22	Combine the amounts in the far right column for lines 7 - 21. This is your total income. ▶	22	66,682

REFERENCE COPY - DO NOT FILE

Adjusted Gross Income

23	Educator expenses	23	
24	Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ	24	
25	Health savings account deduction. Attach Form 8889	25	
26	Moving expenses. Attach Form 3903	26	
27	Deductible part of self-employment tax. Attach Schedule SE	27	
28	Self-employed SEP, SIMPLE, and qualified plans	28	
29	Self-employed health insurance deduction	29	
30	Penalty on early withdrawal of savings	30	
31a	Alimony paid b Recipient's SSN ▶	31a	
32	IRA deduction	32	
33	Student loan interest deduction	33	
34	Tuition and fees. Attach Form 8917	34	
35	Domestic production activities deduction. Attach Form 8903	35	
36	Add lines 23 through 35	36	NONE
37	Subtract line 36 from line 22. This is your adjusted gross income ▶	37	66,682

MKA For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions. F 12/23/16 Form 1040 (2016)

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Tax and Credits

38	Amount from line 37 (adjusted gross income)	38	65,682
39 a	Check if: [X] You were born before January 2, 1952. [ ] Blind. [X] Spouse was born before January 2, 1952. [ ] Blind. Total boxes checked ▶ 39a 2		
b	If your spouse itemizes on a separate return or you were a dual-status alien, check here ▶ 39b [ ]		
40	Itemized deductions (from Schedule A) or your standard deduction (see left margin)	40	37,453
41	Subtract line 40 from line 38	41	29,229
42	Exemptions. If line 38 is $155,650 or less, multiply $4,050 by the number on line 6d. Otherwise, see instructions	42	8,100
43	Taxable income. Subtract line 42 from line 41. If line 42 is more than line 41, enter -0-	43	21,129
44	Tax (see instr). Check if any from: a [ ] Form(s) 8814 b [ ] Form 4972 c [ ]	44	2,241
45	Alternative minimum tax (see instructions). Attach Form 6251	45	
46	Excess advance premium tax credit repayment. Attach Form 8962	46	
47	Add lines 44, 45 and 46	47	2,241
48	Foreign tax credit. Attach Form 1116 if required	48	
49	Credit for child and dependent care expenses. Attach Form 2441	49	
50	Education credits from Form 8863, line 19	50	
51	Retirement savings contributions credit. Attach Form 8880	51	
52	Child tax credit. Attach Schedule 8812, if required	52	
53	Residential energy credits. Attach Form 5695	53	
54	Other credits from Form: a [ ] 3800 b [ ] 8801 c [ ]	54	
55	Add lines 48 through 54. These are your total credits	55	
56	Subtract line 55 from line 47. If line 55 is more than line 47, enter -0- ▶	56	2,241

Standard Deduction for - ● People who check any box on line 39a or 39b or who can be claimed as a dependent, see instructions. ● All others: Single or Married filing separately, $6,300 Married filing jointly or Qualifying widow(er), $12,600 Head of household, $9,300

Other Taxes

57	Self-employment tax. Attach Schedule SE	57	
58	Unreported social security and Medicare tax from Form: a [ ] 4137 b [ ] 8919	58	
59	Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required	59	
60 a	Household employment taxes from Schedule H	60a	
b	First-time homebuyer credit repayment. Attach Form 5405 if required	60b	
61	Health care: individual responsibility (see instructions) Full-year coverage [X]	61	
62	Taxes from: a [ ] Form 8959 b [ ] Form 8960 c [ ] Instructions; enter code(s)	62	
63	Add lines 56 through 62. This is your total tax ▶	63	2,241

Payments

64	Federal income tax withheld from Forms W-2 and 1099	64	1,207
65	2016 estimated tax payments and amount applied from 2015 return	65	
66 a	Earned income credit (EIC)	66a	
b	Nontaxable combat pay election 66b		
67	Additional child tax credit. Attach Schedule 8812	67	
68	American opportunity credit from Form 8863, line 8	68	
69	Net premium tax credit. Attach Form 8962	69	
70	Amount paid with request for extension to file	70	
71	Excess social security and tier 1 RRTA tax withheld	71	
72	Credit for federal tax on fuels. Attach Form 4136	72	
73	Credits from Form: a [ ] 2439 b [ ] Reserved c [ ] 8885 d [ ]	73	
74	Add lines 64, 65, 66a, and 67 through 73. These are your total payments ▶	74	1,207

If you have a qualifying child, attach Schedule EIC.

Refund

75	If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid	75	
76 a	Amount of line 75 you want refunded to you. If Form 8888 is attached, check here ▶ [ ]	76a	
▶ b	Routing number ▶ c Type: [ ] Checking [ ] Savings		
▶ d	Account number		
77	Amount of line 75 you want applied to your 2017 estimated tax ▶	77	

Direct deposit? See instructions

Amount You Owe

78	Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions ▶	78	1,034
79	Estimated tax penalty (see instructions)	79	NONE

Third Party Designee

Do you want to allow another person to discuss this return with the IRS (see instructions)? [X] Yes. Complete below. [ ] No

Designee's name ▶ Dick Rasnick Phone no. ▶ (803) 366-4202 Personal identification number (PIN) ▶ 25648

Sign Here

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Joint return? See instructions. Keep a copy for your records.

Your signature	Date	Your occupation	Daytime phone number
		RETIRED	
Spouse's signature, if a joint return, both must sign.	Date	Spouse's occupation	If the IRS sent you an Identity Protection PIN, Enter it here
		CLERK	

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check [ ] if self-employed	PTIN

Firm's name ▶ Jackson Hewitt Tax Service Firm's EIN ▶ 57-1055629

Firm's address ▶ 2020 N. Cherry Road Rock Hill SC 29732 Phone no. (803) 366-4202

Form **1040** Department of the Treasury - Internal Revenue Service (99) **U.S. Individual Income Tax Return** **2017** OMB No. 1545-0074 IRS Use Only-Do not write or staple in this space.

For the year Jan. 1-Dec. 31, 2017, or other tax year beginning , 2017, ending , 20 See separate instructions.

Your first name and initial	Last name	Your social security number
FRANK	EASON	[redacted]
If a joint return, spouse's first name and initial	Last name	Spouse's social security number
EDITH	KERN EASON	[redacted]

Home address (number and street). If you have a P.O. box, see instructions. Apt. no.
488 OLD CARRIAGE ROAD

Make sure the SSN(s) above and on line 6c are correct.

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions).
CLOVER SC 29710

Foreign country name | Foreign province/state/county | Foreign postal code

Presidential Election Campaign
Check here if you, or your spouse if filing jointly, want $3 to go to this fund. Checking a box below will not change your tax or refund. ☐ You ☐ Spouse

Filing Status Check only one box.
1 ☐ Single
2 ☒ Married filing jointly (even if only one had income)
3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▶
4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. ▶
5 ☐ Qualifying widow(er) (see instructions)

Exemptions
6a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a
b ☒ Spouse
Boxes checked on 6a and 6b: 2

c Dependents:

(1) First name	Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) Chk if child under age 17 qualifying for child tax credit (see instructions)
MYRA	BEAN	655-07-6891	Daughter	
CASSIDY	BEAN	656-12-9409	Daughter	X

If more than four dependents, see instructions and check here ▶ ☐

No. of children on 6c who: • lived with you: 2 • did not live with you due to divorce or separation (see instructions): ___
Dependents on 6c not entered above: ___
Add numbers on lines above ▶ 4

d Total number of exemptions claimed

Income
Attach Form(s) W-2 here. Also attach Forms W-2G and 1099-R if tax was withheld.
If you did not get a W-2, see instructions.

7	Wages, salaries, tips, etc. Attach Form(s) W-2		7	92,150
8a	Taxable interest. Attach Schedule B if required		8a	51
b	Tax-exempt interest. Do not include on line 8a	8b		
9a	Ordinary dividends. Attach Schedule B if required		9a	
b	Qualified dividends	9b		
10	Taxable refunds, credits, or offsets of state and local income taxes		10	3,500
11	Alimony received		11	
12	Business income or (loss). Attach Schedule C or C-EZ		12	65,174
13	Capital gain or (loss). Attach Schedule D if required. If not required, check here ▶ ☐		13	
14	Other gains or (losses). Attach Form 4797		14	
15a	IRA distributions	15a	b Taxable amount 15b	
16a	Pensions and annuities	16a	b Taxable amount 16b	
17	Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E		17	(54,719)
18	Farm income or (loss). Attach Schedule F		18	
19	Unemployment compensation		19	
20a	Social security benefits	20a	b Taxable amount 20b	
21	Other income		21	
22	Combine the amounts in the far right column for lines 7 through 21. This is your total income ▶		22	106,156

Adjusted Gross Income

23	Educator expenses	23		
24	Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ	24		
25	Health savings account deduction. Attach Form 8889	25		
26	Moving expenses. Attach Form 3903	26		
27	Deductible part of self-employment tax. Attach Schedule SE	27	4,497	
28	Self-employed SEP, SIMPLE, and qualified plans	28		
29	Self-employed health insurance deduction	29		
30	Penalty on early withdrawal of savings	30		
31a	Alimony paid b Recipient's SSN ▶	31a		
32	IRA deduction	32		
33	Student loan interest deduction	33		
34	Tuition and fees. Attach Form 8917	34		
35	Domestic production activities deduction. Attach Form 8903	35		
36	Add lines 23 through 35		36	4,497
37	Subtract line 36 from line 22. This is your adjusted gross income ▶		37	101,659

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SEA

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Tax and Credits	38	Amount from line 37 (adjusted gross income)	38	101,659
	39a	Check if: [ ] You were born before January 2, 1953, [ ] Blind. [ ] Spouse was born before January 2, 1953, [ ] Blind. } Total boxes checked ▶ 39a [ ]		
	b	If your spouse itemizes on a separate return or you were a dual-status alien, check here ▶ 39b [ ]		
Standard Deduction for - • People who check any box on line 39a or 39b or who can be claimed as a dependent, see instructions. • All others: Single or Married filing separately, $6,350; Married filing jointly or Qualifying widow(er), $12,700; Head of household, $9,350	40	Itemized deductions (from Schedule A) or your standard deduction (see left margin)	40	35,381
	41	Subtract line 40 from line 38	41	66,278
	42	Exemptions. If line 38 is $156,800 or less, multiply $4,050 by the number on line 6d. Otherwise, see instructions	42	16,200
	43	Taxable income. Subtract line 42 from line 41. If line 42 is more than line 41, enter -0-	43	50,078
	44	Tax (see instructions). Check if any from: a [ ] Form(s) 8814 b [ ] Form 4972 c [ ]	44	6,579
	45	Alternative minimum tax (see instructions). Attach Form 6251	45	0
	46	Excess advance premium tax credit repayment. Attach Form 8962	46	
	47	Add lines 44, 45, and 46 ▶	47	6,579
	48	Foreign tax credit. Attach Form 1116 if required [48]		
	49	Credit for child and dependent care expenses. Attach Form 2441 [49]		
	50	Education credits from Form 8863, line 19 [50]		
	51	Retirement savings contributions credit. Attach Form 8880 [51]		
	52	Child tax credit. Attach Schedule 8812, if required [52] 1,000		
	53	Residential energy credits. Attach Form 5695 [53]		
	54	Other credits from Form: a [ ] 3800 b [X] 8801 c [ ] [54] 665		
	55	Add lines 48 through 54. These are your total credits	55	1,665
	56	Subtract line 55 from line 47. If line 55 is more than line 47, enter -0- ▶	56	4,914
Other Taxes	57	Self-employment tax. Attach Schedule SE	57	8,993
	58	Unreported social security and Medicare tax from Form: a [ ] 4137 b [ ] 8919	58	
	59	Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required	59	
	60 a	Household employment taxes from Schedule H	60a	
	b	First-time homebuyer credit repayment. Attach Form 5405 if required	60b	
	61	Health care: individual responsibility (see instructions) Full-year coverage [X]	61	
	62	Taxes from: a [ ] Form 8959 b [ ] Form 8960 c [ ] Instructions; enter code(s)	62	
	63	Add lines 56 through 62. This is your total tax ▶	63	13,907
Payments	64	Federal income tax withheld from Forms W-2 and 1099 [64] 14,394		
If you have a qualifying child, attach Schedule EIC.	65	2017 estimated tax payments and amount applied from 2016 return [65]		
	66a	Earned income credit (EIC) [66a]		
	b	Nontaxable combat pay election [66b]		
	67	Additional child tax credit. Attach Schedule 8812 [67]		
	68	American opportunity credit from Form 8863, line 8 [68]		
	69	Net premium tax credit. Attach Form 8962 [69]		
	70	Amount paid with request for extension to file [70]		
	71	Excess social security and tier 1 RRTA tax withheld [71]		
	72	Credit for federal tax on fuels. Attach Form 4136 [72]		
	73	Credits from Form: a [ ] 2439 b [ ] Reserved c [ ] 8885 d [ ] [73]		
	74	Add lines 64, 65, 66a, and 67 through 73. These are your total payments ▶	74	14,394
Refund	75	If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid	75	487
	76a	Amount of line 75 you want refunded to you. If Form 8888 is attached, check here ▶ [ ]	76a	487
Direct deposit? See instructions.	▶ b	Routing number X X X X X X X X X ▶ c Type: [ ] Checking [ ] Savings		
	▶ d	Account number X X X X X X X X X X X X X X X X X		
	77	Amount of line 75 you want applied to your 2018 estimated tax ▶ [77]		
Amount You Owe	78	Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions ▶	78	
	79	Estimated tax penalty (see instructions) [79]		

Third Party Designee Do you want to allow another person to discuss this return with the IRS (see instructions)? [ ] Yes. Complete below. [X] No
Designee's name ▶ Phone no. ▶ Personal identification number (PIN) ▶

Sign Here Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and accurately list all amounts and sources of income I received during the tax year. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Joint return? See instructions. Keep a copy for your records.

Your signature	Date	Your occupation	Daytime phone number
58198	03-20-2018	MANAGER	704-302-4905
Spouse's signature. If a joint return, both must sign.	Date	Spouse's occupation	Identity Protection PIN (see inst.)
18755	03-20-2018	RETAIL SALES	

Paid Preparer Use Only

Preparer's signature: PATRICK COLEMAN CPA	Date: 05-23-2018	Check [ ] if self-employed	PTIN: P01300718
Print/Type preparer's name: PATRICK COLEMAN CPA			
Firm's name ▶ PATRICK J COLEMAN CPA PLLC		Firm's EIN ▶ 26-1224550	
Firm's address ▶ 6500 BALLYBAY DRIVE Charlotte, NC 28278		Phone no. 704-302-4905	

EEA Go to www.irs.gov/Form 1040 for instructions and the latest information. Form 1040 (2017)

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SCHEDULE A (Form 1040)

Department of the Treasury Internal Revenue Service (99)

Itemized Deductions

▶ Go to *www.irs.gov/ScheduleA* for instructions and the latest information.

▶ Attach to Form 1040.

Caution: If you are claiming a net qualified disaster loss on Form 4684, see the instructions for line 28.

OMB No. 1545-0074

2017

Attachment Sequence No. 07

Name(s) shown on Form 1040: FRANK EASON & EDITH KERN EASON

Your social security number: [redacted]

Medical and Dental Expenses		Caution: Do not include expenses reimbursed or paid by others.			
	1	Medical and dental expenses (see instructions)	1		
	2	Enter amount from Form 1040, line 38 [2]			
	3	Multiply line 2 by 7.5% (0.075)	3		
	4	Subtract line 3 from line 1. If line 3 is more than line 1, enter -0-		4	
Taxes You Paid	5	State and local (check only one box): a [X] Income taxes, or b [ ] General sales taxes	5	16,672	
	6	Real estate taxes (see instructions)	6	3,467	
	7	Personal property taxes	7	1,215	
	8	Other taxes. List type and amount ▶	8		
	9	Add lines 5 through 8		9	21,354
Interest You Paid	10	Home mortgage interest and points reported to you on Form 1098	10	6,457	
Note: Your mortgage interest deduction may be limited (see instructions).	11	Home mortgage interest not reported to you on Form 1098. If paid to the person from whom you bought the home, see instructions and show that person's name, identifying no., and address ▶	11		
	12	Points not reported to you on Form 1098. See instructions for special rules	12		
	13	Mortgage insurance premiums (see instructions)	13		
	14	Investment interest. Attach Form 4952 if required. See instructions.	14		
	15	Add lines 10 through 14		15	6,457
Gifts to Charity	16	Gifts by cash or check. If you made any gift of $250 or more, see instructions	16	7,570	
If you made a gift and got a benefit for it, see instructions.	17	Other than by cash or check. If any gift of $250 or more, see instructions. You must attach Form 8283 if over $500	17		
	18	Carryover from prior year	18		
	19	Add lines 16 through 18		19	7,570
Casualty and Theft Losses	20	Casualty or theft loss(es) other than net qualified disaster losses. Attach Form 4684 and enter the amount from line 18 of that form. See instructions		20	
Job Expenses and Certain Miscellaneous Deductions	21	Unreimbursed employee expenses - job travel, union dues, job education, etc. Attach Form 2106 or 2106-EZ if required. See instr. ▶	21		
	22	Tax preparation fees	22		
	23	Other expenses - investment, safe deposit box, etc. List type and amount ▶	23		
	24	Add lines 21 through 23	24		
	25	Enter amount from Form 1040, line 38 [25]			
	26	Multiply line 25 by 2% (0.02)	26		
	27	Subtract line 26 from line 24. If line 26 is more than line 24, enter -0-		27	
Other Miscellaneous Deductions	28	Other - from list in instructions. List type and amount ▶		28	
Total Itemized Deductions	29	Is Form 1040, line 38, over $156,900? [X] No. Your deduction is not limited. Add the amounts in the far right column for lines 4 through 28. Also, enter this amount on Form 1040, line 40. [ ] Yes. Your deduction may be limited. See the Itemized Deductions Worksheet in the instructions to figure the amount to enter.		29	35,381
	30	If you elect to itemize deductions even though they are less than your standard deduction, check here ▶ [ ]			

For Paperwork Reduction Act Notice, see the instructions for Form 1040.

SEA

Schedule A (Form 1040) 2017

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SCHEDULE C (Form 1040)

Department of the Treasury Internal Revenue Service (99)

Profit or Loss From Business

(Sole Proprietorship)

▶ Go to www.irs.gov/ScheduleC for instructions and the latest information.

▶ Attach to Form 1040, 1040NR, or 1041; partnerships generally must file Form 1065.

OMB No. 1545-0074

2017

Attachment Sequence No. 09

Name of proprietor: FRANK EASON

Social security number (SSN): [redacted]

A Principal business or profession, including product or service (see instructions): TRUCKING

B Enter code from instructions ▶ 484120

C Business name. If no separate business name, leave blank.: EASON TRUCKING

D Employer ID number (EIN), (see instr.)

E Business address (including suite or room no.) ▶ 488 OLD CARRIAGE ROAD

City, town or post office, state, and ZIP code: Clover, SC 29710

F Accounting method: (1) [X] Cash (2) [ ] Accrual (3) [ ] Other (specify) ▶

G Did you "materially participate" in the operation of this business during 2017? If "No," see instructions for limit on losses ▶ [X] Yes [ ] No

H If you started or acquired this business during 2017, check here ▶ [ ]

I Did you make any payments in 2017 that would require you to file Form(s) 1099? (see instructions) [ ] Yes [ ] No

J If "Yes," did you or will you file required Forms 1099? [ ] Yes [ ] No

Part I Income

1	Gross receipts or sales. See instructions for line 1 and check the box if this income was reported to you on Form W-2 and the "Statutory employee" box on that form was checked ▶ [ ]	1	142,215
2	Returns and allowances	2	0
3	Subtract line 2 from line 1	3	142,215
4	Cost of goods sold (from line 42)	4	
5	Gross profit. Subtract line 4 from line 3	5	142,215
6	Other income, including federal and state gasoline or fuel tax credit or refund (see instructions)	6	
7	Gross income. Add lines 5 and 6 ▶	7	142,215

Part II Expenses. Enter expenses for business use of your home only on line 30.

8	Advertising	8		18	Office expense (see instructions)	18	
9	Car and truck expenses (see instructions)	9		19	Pension and profit-sharing plans	19	
10	Commissions and fees	10		20	Rent or lease (see instructions):		
11	Contract labor (see instructions)	11		a	Vehicles, machinery, and equipment	20a	
12	Depletion	12		b	Other business property	20b	
13	Depreciation and section 179 expense deduction (not included in Part III) (see instructions)	13	64,607	21	Repairs and maintenance	21	
14	Employee benefit programs (other than on line 19)	14		22	Supplies (not included in Part III)	22	
15	Insurance (other than health)	15		23	Taxes and licenses	23	201
16	Interest:			24	Travel, meals, and entertainment:		
a	Mortgage (paid to banks, etc.)	16a		a	Travel	24a	
b	Other	16b		b	Deductible meals and entertainment (see instructions)	24b	
17	Legal and professional services	17		25	Utilities	25	
				26	Wages (less employment credits)	26	
				27a	Other expenses (from line 48)	27a	12,233
				b	Reserved for future use	27b	

28	Total expenses before expenses for business use of home. Add lines 8 through 27a ▶	28	77,041
29	Tentative profit or (loss). Subtract line 28 from line 7	29	65,174
30	Expenses for business use of your home. Do not report these expenses elsewhere. Attach Form 8829 unless using the simplified method (see instructions). Simplified method filers only: enter the total square footage of: (a) your home: _____ and (b) the part of your home used for business: _____. Use the Simplified Method Worksheet in the instructions to figure the amount to enter on line 30	30	
31	Net profit or (loss). Subtract line 30 from line 29. • If a profit, enter on both Form 1040, line 12 (or Form 1040NR, line 13) and on Schedule SE, line 2. (If you checked the box on line 1, see instructions). Estates and trusts, enter on Form 1041, line 3. • If a loss, you must go to line 32.	31	65,174

32 If you have a loss, check the box that describes your investment in this activity (see instructions).
• If you checked 32a, enter the loss on both Form 1040, line 12, (or Form 1040NR, line 13) and on Schedule SE, line 2. (If you checked the box on line 1, see the line 31 instructions). Estates and trusts, enter on Form 1041, line 3.
• If you checked 32b, you must attach Form 6198. Your loss may be limited.

32a [ ] All investment is at risk.
32b [ ] Some investment is not at risk.

For Paperwork Reduction Act Notice, see the separate instructions.

Schedule C (Form 1040) 2017

EEIA

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Name(s) FRANK EASON | SSN [redacted]

Part III Cost of Goods Sold (see instructions)

33 Method(s) used to value closing inventory: a ☐ Cost b ☐ Lower of cost or market c ☐ Other (attach explanation)

34 Was there any change in determining quantities, costs, or valuations between opening and closing inventory? If "Yes," attach explanation ☐ Yes ☐ No

35	Inventory at beginning of year. If different from last year's closing inventory, attach explanation	35	
36	Purchases less cost of items withdrawn for personal use	36	
37	Cost of labor. Do not include any amounts paid to yourself	37	
38	Materials and supplies	38	
39	Other costs	39	
40	Add lines 35 through 39	40	
41	Inventory at end of year	41	
42	Cost of goods sold. Subtract line 41 from line 40. Enter the result here and on line 4	42	

Part IV Information on Your Vehicle. Complete this part only if you are claiming car or truck expenses on line 9 and are not required to file Form 4562 for this business. See the instructions for line 13 to find out if you must file Form 4562.

43 When did you place your vehicle in service for business purposes? (month, day, year) ▶

44 Of the total number of miles you drove your vehicle during 2017, enter the number of miles you used your vehicle for:

a Business b Commuting (see instructions) c Other

45 Was your vehicle available for personal use during off-duty hours? ☐ Yes ☐ No

46 Do you (or your spouse) have another vehicle available for personal use? ☐ Yes ☐ No

47a Do you have evidence to support your deduction? ☐ Yes ☐ No

b If "Yes," is the evidence written? ☐ Yes ☐ No

Part V Other Expenses. List below business expenses not included on lines 8-26 or line 30.

FINES	12
BANK CHARGES	145
TRUCK EXPENSE	12,076

48 Total other expenses. Enter here and on line 27a 48 12,233

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SCHEDULE E (Form 1040)

Department of the Treasury Internal Revenue Service (99)

Supplemental Income and Loss

(From rental real estate, royalties, partnerships, S corporations, estates, trusts, REMICs, etc.)

▶ Attach to Form 1040, 1040NR, or Form 1041.

▶ Go to www.irs.gov/ScheduleE for instructions and the latest information.

OMB No. 1545-0074

2017

Attachment Sequence No. 13

Name(s) shown on return: FRANK EASON & EDITH KERN EASON

Your social security number: [redacted]

Part I Income or Loss From Rental Real Estate and Royalties Note: If you are in the business of renting personal property, use Schedule C or C-EZ (see instructions). If you are an individual, report farm rental income or loss from Form 4835 on page 2, line 40.

A Did you make any payments in 2017 that would require you to file Form(s) 1099? (see instructions) ☐ Yes ☐ No

B If "Yes," did you or will you file required Forms 1099? ☐ Yes ☐ No

1a	Physical address of each property (street, city, state, ZIP code)
A	6175 CHARLOTTE HWY, York, SC 29745
B	6175 CHARLOTTE HWY, York, SC 29745
C	

1b	Type of Property (from list below)
A	4
B	4
C	

2 For each rental real estate property listed above, report the number of fair rental and personal use days. Check the QJV box only if you meet the requirements to file as a qualified joint venture. See instructions.

	Fair Rental Days	Personal Use Days	QJV
A	365	0	☐
B	365	0	☒
C			☐

Type of Property:

1 Single Family Residence 3 Vacation/Short-Term Rental 5 Land 7 Self-Rental

2 Multi-Family Residence 4 Commercial 6 Royalties 8 Other (describe)

Income:	Properties:		A	B	C
3 Rents received		3	75,563		
4 Royalties received		4			
Expenses:					
5 Advertising		5			
6 Auto and travel (see instructions)		6			
7 Cleaning and maintenance		7			
8 Commissions		8			
9 Insurance		9			
10 Legal and other professional fees		10		350	
11 Management fees		11			
12 Mortgage interest paid to banks, etc. (see instructions)		12			
13 Other interest		13			
14 Repairs		14	334		
15 Supplies		15			
16 Taxes		16	8,452		
17 Utilities		17			
18 Depreciation expense or depletion		18	3,398		
19 Other (list) ▶ Statement #1		19	56,033		
20 Total expenses. Add lines 5 through 19		20	68,217	350	
21 Subtract line 20 from line 3 (rents) and/or 4 (royalties). If result is a (loss), see instructions to find out if you must file Form 6198		21	7,346	(350)	
22 Deductible rental real estate loss after limitation, if any, on Form 8582 (see instructions)		22	( )	(350)	( )

23a Total of all amounts reported on line 3 for all rental properties	23a	75,563
b Total of all amounts reported on line 4 for all royalty properties	23b	0
c Total of all amounts reported on line 12 for all properties	23c	0
d Total of all amounts reported on line 18 for all properties	23d	3,398
e Total of all amounts reported on line 20 for all properties	23e	68,567

24 Income. Add positive amounts shown on line 21. Do not include any losses	24	7,346
25 Losses. Add royalty losses from line 21 and rental real estate losses from line 22. Enter total losses here	25	(350)
26 Total rental real estate and royalty income or (loss). Combine lines 24 and 25. Enter the result here. If Parts II, III, IV, and line 40 on page 2 do not apply to you, also enter this amount on Form 1040, line 17, or Form 1040NR, line 18. Otherwise, include this amount in the total on line 41 on page 2	26	6,996

For Paperwork Reduction Act Notice, see the separate instructions.

Schedule E (Form 1040) 2017

EEA

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Name(s) shown on return. Do not enter name and social security number if shown on page 1.

FRANK EASON & EDITH KERN EASON

Your social security number [redacted]

Caution: The IRS compares amounts reported on your tax return with amounts shown on Schedule(s) K-1.

Part II Income or Loss From Partnerships and S Corporations Note: If you report a loss from an at-risk activity for which any amount is not at risk, you must check the box in column (e) on line 28 and attach Form 6198. See instructions.

27 Are you reporting any loss not allowed in a prior year due to the at-risk, excess farm loss, or basis limitations, a prior year unallowed loss from a passive activity (if that loss was not reported on Form 8582), or unreimbursed partnership expenses? If you answered "Yes," see instructions before completing this section ☐ Yes ☒ No

28	(a) Name	(b) Enter P for partnership; S for S corporation	(c) Check if foreign partnership	(d) Employer identification number	(e) Check if any amount is not at risk
A	EASON ROOFING LLC	S	☐	20-2903987	☐
B			☐		☐
C			☐		☐
D			☐		☐

	Passive Income and Loss		Nonpassive Income and Loss		
	(f) Passive loss allowed (attach Form 8582 if required)	(g) Passive income from Schedule K-1	(h) Nonpassive loss from Schedule K-1	(i) Section 179 expense deduction from Form 4562	(j) Nonpassive income from Schedule K-1
A			61,715		
B					
C					
D					
29a Totals					
b Totals			61,715		

30	Add columns (g) and (j) of line 29a	30	
31	Add columns (f), (h), and (i) of line 29b	31	(61,715)
32	Total partnership and S corporation income or (loss). Combine lines 30 and 31. Enter the result here and include in the total on line 41 below	32	(61,715)

Part III Income or Loss From Estates and Trusts

33	(a) Name	(b) Employer identification number
A		
B		

	Passive Income and Loss		Nonpassive Income and Loss	
	(c) Passive deduction or loss allowed (attach Form 8582 if required)	(d) Passive income from Schedule K-1	(e) Deduction or loss from Schedule K-1	(f) Other income from Schedule K-1
A				
B				
34a Totals				
b Totals				

35	Add columns (d) and (f) of line 34a	35	
36	Add columns (c) and (e) of line 34b	36	( )
37	Total estate and trust income or (loss). Combine lines 35 and 36. Enter the result here and include in the total on line 41 below	37	

Part IV Income or Loss From Real Estate Mortgage Investment Conduits (REMICs) - Residual Holder

38	(a) Name	(b) Employer identification number	(c) Excess inclusion from Schedules Q, line 2c (see instructions)	(d) Taxable income (net loss) from Schedules Q, line 1b	(e) Income from Schedules Q, line 3b

39 Combine columns (d) and (e) only. Enter the result here and include in the total on line 41 below 39

Part V Summary

40	Net farm rental income or (loss) from Form 4835. Also, complete line 42 below	40	
41	Total income or (loss). Combine lines 26, 32, 37, 39, and 40. Enter the result here and on Form 1040, line 17, or Form 1040NR, line 18 ▶	41	(54,719)
42	Reconciliation of farming and fishing income. Enter your gross farming and fishing income reported on Form 4835, line 7; Schedule K-1 (Form 1065), box 14, code B; Schedule K-1 (Form 1120S), box 17, code V; and Schedule K-1 (Form 1041), box 14, code F (see instructions)	42	
43	Reconciliation for real estate professionals. If you were a real estate professional (see instructions), enter the net income or (loss) you reported anywhere on Form 1040 or Form 1040NR from all rental real estate activities in which you materially participated under the passive activity loss rules	43	

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Name of person with self-employment income (as shown on Form 1040 or Form 1040NR): FRANK EASON

Social security number of person with self-employment income ▶ [redacted]

Section B—Long Schedule SE

Part I Self-Employment Tax

Note. If your only income subject to self-employment tax is church employee income, see instructions. Also see instructions for the definition of church employee income.

A If you are a minister, member of a religious order, or Christian Science practitioner and you filed Form 4361, but you had $400 or more of other net earnings from self-employment, check here and continue with Part I ▶ ☐

1a	Net farm profit or (loss) from Schedule F, line 34, and farm partnerships, Schedule K-1 (Form 1065), box 14, code A. Note: Skip lines 1a and 1b if you use the farm optional method (see instructions)	1a	
b	If you received social security retirement or disability benefits, enter the amount of Conservation Reserve Program payments included on Schedule F, line 4b, or listed on Schedule K-1 (Form 1065), box 20, code Z	1b	( )
2	Net profit or (loss) from Schedule C, line 31; Schedule C-EZ, line 3; Schedule K-1 (Form 1065), box 14, code A (other than farming); and Schedule K-1 (Form 1065-B), box 9, code J1. Ministers and members of religious orders, see instructions for types of income to report on this line. See instructions for other income to report. Note: Skip this line if you use the nonfarm optional method (see instructions)	2	65,174
3	Combine lines 1a, 1b, and 2	3	65,174
4a	If line 3 is more than zero, multiply line 3 by 92.35% (0.9235). Otherwise, enter amount from line 3 Note: If line 4a is less than $400 due to Conservation Reserve Program payments on line 1b, see instructions.	4a	60,188
b	If you elect one or both of the optional methods, enter the total of lines 15 and 17 here	4b	
c	Combine lines 4a and 4b. If less than $400, stop; you don't owe self-employment tax. Exception: If less than $400 and you had church employee income, enter -0- and continue ▶	4c	60,188
5a	Enter your church employee income from Form W-2. See instructions for definition of church employee income — 5a		
b	Multiply line 5a by 92.35% (0.9235). If less than $100, enter -0-	5b	
6	Add lines 4c and 5b	6	60,188
7	Maximum amount of combined wages and self-employment earnings subject to social security tax or the 6.2% portion of the 7.65% railroad retirement (tier 1) tax for 2017	7	127,200.00
8a	Total social security wages and tips (total of boxes 3 and 7 on Form(s) W-2) and railroad retirement (tier 1) compensation. If $127,200 or more, skip lines 8b through 10, and go to line 11 — 8a: 68,750		
b	Unreported tips subject to social security tax (from Form 4137, line 10) — 8b		
c	Wages subject to social security tax (from Form 8919, line 10) — 8c		
d	Add lines 8a, 8b, and 8c	8d	68,750
9	Subtract line 8d from line 7. If zero or less, enter -0- here and on line 10 and go to line 11 ▶	9	58,450
10	Multiply the smaller of line 6 or line 9 by 12.4% (0.124)	10	7,248
11	Multiply line 6 by 2.9% (0.029)	11	1,745
12	Self-employment tax. Add lines 10 and 11. Enter here and on Form 1040, line 57, or Form 1040NR, line 55	12	8,993
13	Deduction for one-half of self-employment tax. Multiply line 12 by 50% (0.50). Enter the result here and on Form 1040, line 27, or Form 1040NR, line 27 — 13: 4,497		

Part II Optional Methods To Figure Net Earnings (see instructions)

Farm Optional Method. You may use this method only if (a) your gross farm income[1] wasn't more than $7,800, or (b) your net farm profits[2] were less than $5,631.

14	Maximum income for optional methods	14	5,200.00
15	Enter the smaller of: two-thirds (2/3) of gross farm income[1] (not less than zero) or $5,200. Also include this amount on line 4b above	15	

Nonfarm Optional Method. You may use this method only if (a) your net nonfarm profits[3] were less than $5,631 and also less than 72.189% of your gross nonfarm income[4], and (b) you had net earnings from self-employment of at least $400 in 2 of the prior 3 years. Caution: You may use this method no more than five times.

16	Subtract line 15 from line 14	16	
17	Enter the smaller of: two-thirds (2/3) of gross nonfarm income[4] (not less than zero) or the amount on line 16. Also include this amount on line 4b above	17	

[1] From Sch. F, line 9, and Sch. K-1 (Form 1065), box 14, code B.

[2] From Sch. F, line 34, and Sch. K-1 (Form 1065), box 14, code A—minus the amount you would have entered on line 1b had you not used the optional method.

[3] From Sch. C, line 31; Sch. C-EZ, line 3; Sch. K-1 (Form 1065), box 14, code A; and Sch. K-1 (Form 1065-B), box 9, code J1.

[4] From Sch. C, line 7; Sch. C-EZ, line 1; Sch. K-1 (Form 1065), box 14, code C; and Sch. K-1 (Form 1065-B), box 9, code J2.

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Form **6251**

Department of the Treasury
Internal Revenue Service (99)

Alternative Minimum Tax - Individuals

▶ Go to www.irs.gov/Form 6251 for instructions and the latest information.
▶ Attach to Form 1040 or Form 1040NR.

OMB No. 1545-0074
2017
Attachment Sequence No. 32

Name(s) shown on Form 1040 or Form 1040NR: FRANK EASON & EDITH KERN EASON

Your social security number: [redacted]

Part I Alternative Minimum Taxable Income (See instructions for how to complete each line.)

1	If filing Schedule A (Form 1040), enter the amount from Form 1040, line 41, and go to line 2. Otherwise, enter the amount from Form 1040, line 38, and go to line 7. (If less than zero, enter as a negative amount.)	1	66,278
2	Reserved for future use	2	
3	Taxes from Schedule A (Form 1040), line 9	3	21,354
4	Enter the home mortgage interest adjustment, if any, from line 6 of the worksheet in the instructions for this line	4	
5	Miscellaneous deductions from Schedule A (Form 1040), line 27	5	
6	If Form 1040, line 38 is $156,900 or less, enter -0-. Otherwise, see instructions	6	( )
7	Tax refund from Form 1040, line 10 or line 21	7	(3,500)
8	Investment interest expense (difference between regular tax and AMT)	8	
9	Depletion (difference between regular tax and AMT)	9	
10	Net operating loss deduction from Form 1040, line 21. Enter as a positive amount	10	
11	Alternative tax net operating loss deduction	11	( )
12	Interest from specified private activity bonds exempt from the regular tax	12	
13	Qualified small business stock, see instructions	13	
14	Exercise of incentive stock options (excess of AMT income over regular tax income)	14	
15	Estates and trusts (amount from Schedule K-1 (Form 1041), box 12, code A)	15	
16	Electing large partnerships (amount from Schedule K-1 (Form 1065-B), box 6)	16	
17	Disposition of property (difference between AMT and regular tax gain or loss)	17	
18	Depreciation on assets placed in service after 1986 (difference between regular tax and AMT)	18	
19	Passive activities (difference between AMT and regular tax income or loss)	19	
20	Loss limitations (difference between AMT and regular tax income or loss)	20	
21	Circulation costs (difference between regular tax and AMT)	21	
22	Long-term contracts (difference between AMT and regular tax income)	22	
23	Mining costs (difference between regular tax and AMT)	23	
24	Research and experimental costs (difference between regular tax and AMT)	24	
25	Income from certain installment sales before January 1, 1987	25	( )
26	Intangible drilling costs preference	26	
27	Other adjustments, including income-based related adjustments	27	
28	Alternative minimum taxable income. Combine lines 1 through 27. (If married filing separately and line 28 is more than $249,450, see instructions.)	28	84,132

Part II Alternative Minimum Tax (AMT)

29 Exemption. (If you were under age 24 at the end of 2017, see instructions.)

IF your filing status is...	AND line 28 is not over...	THEN enter on line 29...
Single or head of household	$120,700	$54,300
Married filing jointly or qualifying widow(er)	160,900	84,500
Married filing separately	80,450	42,250

If line 28 is over the amount shown above for your filing status, see instructions. ▶ 29: 84,500

30	Subtract line 29 from line 28. If more than zero, go to line 31. If zero or less, enter -0- here and on lines 31, 33, and 35, and go to line 34	30	0
31	• If you are filing Form 2555 or 2555-EZ, see instructions for the amount to enter. • If you reported capital gain distributions directly on Form 1040, line 13; you reported qualified dividends on Form 1040, line 9b; or you had a gain on both lines 15 and 16 of Schedule D (Form 1040) (as refigured for the AMT, if necessary), complete Part III on the back and enter the amount from line 84 here. • All others: If line 30 is $187,800 or less ($93,900 or less if married filing separately), multiply line 30 by 26% (0.26). Otherwise, multiply line 30 by 28% (0.28) and subtract $3,756 ($1,878 if married filing separately) from the result.	31	
32	Alternative minimum tax foreign tax credit (see instructions)	32	
33	Tentative minimum tax. Subtract line 32 from line 31	33	0
34	Add Form 1040, line 44 (minus any tax from Form 4972), and Form 1040, line 46. Subtract from the result any foreign tax credit from Form 1040, line 48. If you used Schedule J to figure your tax on Form 1040, line 44, refigure that tax without using Schedule J before completing this line (see instructions)	34	
35	AMT. Subtract line 34 from line 33. If zero or less, enter -0-. Enter here and on Form 1040, line 45	35	0

For Paperwork Reduction Act Notice, see your tax return instructions.

Form 6251 (2017)
EEA

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Form **8867**

Department of the Treasury
Internal Revenue Service

Paid Preparer's Due Diligence Checklist

Earned Income Credit (EIC), American Opportunity Tax Credit (AOTC), Child Tax Credit (CTC), and Additional Child Tax Credit (ACTC)

▶ To be completed by preparer and filed with Form 1040, 1040A, 1040EZ, 1040NR, 1040SS, or 1040PR.
▶ Go to *www.irs.gov/Form8867* for instructions and the latest information.

OMB No. 1545-1629
2017
Attachment Sequence No. **70**

Taxpayer name(s) shown on return: FRANK EASON & EDITH KERN EASON

Taxpayer identification number: [redacted]

Enter preparer's name and PTIN: PATRICK COLEMAN CPA P01300718

Part I **Due Diligence Requirements**

Please check the appropriate box for the credit(s) claimed on this return and complete the related Parts I–IV for the credit(s) claimed (check all that apply).	EIC ☐	CTC/ACTC ☒	AOTC ☐
1 Did you complete the return based on information for tax year 2017 provided by the taxpayer or reasonably obtained by you?	☒ Yes	☐ No	
2 Did you complete the applicable EIC and/or CTC/ACTC worksheets found in the Form 1040, 1040A, 1040EZ, 1040SS, 1040PR, or 1040NR instructions, and/or the AOTC worksheet found in the Form 8863 instructions, or your own worksheet(s) that provides the same information, and all related forms and schedules for each credit claimed?	☒ Yes	☐ No	
3 Did you satisfy the knowledge requirement? To meet the knowledge requirement, you must do both of the following: • Interview the taxpayer, ask questions, and document the taxpayer's responses to determine that the taxpayer is eligible to claim the credit(s) • Review information to determine that the taxpayer is eligible to claim the credit(s) and for what amount	☒ Yes	☐ No	
4 Did any information provided by the taxpayer, a third party, or reasonably known to you, in connection with preparing the return, appear to be incorrect, incomplete, or inconsistent? (If "Yes," answer questions 4a and 4b. If "No," go to question 5.)	☒ Yes	☐ No	
a Did you make reasonable inquiries to determine the correct, complete, and consistent information?	☒ Yes	☐ No	
b Did you document your inquiries? (Documentation should include the questions you asked, whom you asked, when you asked, the information that was provided, and the impact the information had on your preparation of the return.)	☒ Yes	☐ No	
5 Did you satisfy the record retention requirement? To meet the record retention requirement, you must keep a copy of your documentation referenced in 4b, a copy of this Form 8867, a copy of applicable worksheets, a record of how, when, and from whom the information used to prepare Form 8867 and worksheet(s) was obtained, and a copy of any document(s) provided by the taxpayer that you relied on to determine eligibility or to compute the amount for the credit(s). List those documents, if any, that you relied on. School Records	☒ Yes	☐ No	
6 Did you ask the taxpayer whether he/she could provide documentation to substantiate eligibility for and the amount of the credit(s) claimed on the return if his/her return is selected for audit?	☒ Yes	☐ No	
7 Did you ask the taxpayer if any of these credits were disallowed or reduced in a previous year? (If credits were disallowed or reduced, go to question 7a; if not, go to question 8.)	☒ Yes	☐ No	
a Did you complete the required recertification Form 8862?	☐ Yes	☐ No	☐ N/A
8 If the taxpayer is reporting self-employment income, did you ask questions to prepare a complete and correct Form 1040, Schedule C?	☒ Yes	☐ No	☐ N/A

For Paperwork Reduction Act Notice, see separate instructions.

SEA

Form 8867 (2017)

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Part II **Due Diligence Questions for Returns Claiming EIC** (If the return does not claim EIC, go to Part III.)

	EIC	CTC/ACTC	AOTC
8a Have you determined that this taxpayer is, in fact, eligible to claim the EIC for the number of children for whom the EIC is claimed, or to claim EIC if the taxpayer has no qualifying child? (Skip 8b and 8c if the taxpayer is claiming EIC and does not have a qualifying child.)	☒ Yes ☐ No		
b Did you explain to the taxpayer that he/she may not claim the EIC if the taxpayer has not lived with the child for over half the year, even if the taxpayer has supported the child?	☒ Yes ☐ No		
c Did you explain to the taxpayer the rules about claiming the EIC when a child is the qualifying child of more than one person (tie-breaker rules)?	☒ Yes ☐ No ☐ N/A		

Part III **Due Diligence Questions for Returns Claiming CTC and/or ACTC** (If the return does not claim CTC or ACTC, go to Part IV.)

10a Did all children for whom the taxpayer is claiming the CTC/ACTC reside with the taxpayer? (If "Yes," go to question 10c; if "No," go to question 10b.)		☒ Yes ☐ No	
b Did you ask if there is an active Form 8332, Release/Revocation of Claim to Exemption for Child by Custodial Parent, or a similar statement in place and, if applicable, did you attach it to the return?		☐ Yes ☐ No ☐ N/A	
c Have you determined that the taxpayer has not released the claim to another person?		☒ Yes ☐ No ☐ N/A	

Part IV **Due Diligence Questions for Returns Claiming AOTC** (If the return does not claim AOTC, go to Part V.)

11 Did the taxpayer provide substantiation such as a Form 1098-T and/or receipts for the qualified tuition and related expenses for the claimed AOTC?			☐ Yes ☐ No

Part V **Credit Eligibility Certification**

▷ You have complied with all due diligence requirements with respect to the credits claimed on the return of the taxpayer identified above if you:

A. Interview the taxpayer, ask adequate questions, document the taxpayer's responses on the return or in your notes, review adequate information to determine if the taxpayer is eligible to claim the credit(s) and in what amount(s);

B. Complete this Form 8867 truthfully and accurately and complete the actions described in this checklist for all credits claimed;

C. Submit Form 8867 in the manner required; and

D. Keep all five of the following records for 3 years from the latest of the dates specified in the Form 8867 instructions under *Document Retention*.

1. A copy of Form 8867,
2. The applicable worksheet(s) or your own worksheet(s) for any credits claimed,
3. Copies of any taxpayer documents you may have relied upon to determine eligibility for and the amount of the credit(s),
4. A record of how, when, and from whom the information used to prepare this form and worksheet(s) was obtained, and
5. A record of any additional questions you may have asked to determine eligibility for and amount of the credits, and the taxpayer's answers.

▷ If you have not complied with all due diligence requirements for all credits claimed, you may have to pay a $510 penalty for each credit for which you have failed to comply.

12 Do you certify that all of the answers on this Form 8867 are, to the best of your knowledge, true, correct, and complete?	☒ Yes ☐ No

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Form **8801**

Department of the Treasury
Internal Revenue Service (99)

Credit for Prior Year Minimum Tax-Individuals, Estates, and Trusts

▶ Go to *www.irs.gov/Form8801* for instructions and the latest information.

▶ Attach to Form 1040, 1040NR, or 1041.

OMB No. 1545-1073

2017

Attachment Sequence No. **74**

Name(s) shown on return: FRANK EASON & EDITH KERN EASON

Identifying number: [redacted]

Part I Net Minimum Tax on Exclusion Items

1	Combine lines 1, 6, and 10 of your 2016 Form 6251. Estates and trusts, see instructions	1	316,740
2	Enter adjustments and preferences treated as exclusion items (see instructions)	2	27,575
3	Minimum tax credit net operating loss deduction (see instructions)	3	( )
4	Combine lines 1, 2, and 3. If zero or less, enter -0- here and on line 15 and go to Part II. If more than $247,450 and you were married filing separately for 2016, see instructions	4	344,315
5	Enter: $83,800 if married filing jointly or qualifying widow(er) for 2016; $53,900 if single or head of household for 2016; or $41,900 if married filing separately for 2016. Estates and trusts, enter $23,800	5	83,800
6	Enter: $159,700 if married filing jointly or qualifying widow(er) for 2016; $119,700 if single or head of household for 2016; or $79,850 if married filing separately for 2016. Estates and trusts, enter $79,850	6	159,700
7	Subtract line 6 from line 4. If zero or less, enter -0- here and on line 8 and go to line 9	7	184,615
8	Multiply line 7 by 25% (0.25)	8	46,154
9	Subtract line 8 from line 5. If zero or less, enter -0-. If under age 24 at the end of 2016, see instructions	9	37,646
10	Subtract line 9 from line 4. If zero or less, enter -0- here and on line 15 and go to Part II. Form 1040NR filers, see instructions	10	306,669
11	• If for 2016 you filed Form 2555 or 2555-EZ, see instructions for the amount to enter. • If for 2016 you reported capital gain distributions directly on Form 1040, line 13; you reported qualified dividends on Form 1040, line 9b (Form 1041, line 2b(2)); or you had a gain on both lines 15 and 16 of Schedule D (Form 1040) (lines 18a and 19, column (2), of Schedule D (Form 1041)), complete Part III of Form 8801 and enter the amount from line 55 here. Form 1040NR filers, see instructions. • **All others:** If line 10 is $186,300 or less ($93,150 or less if married filing separately for 2016), multiply line 10 by 26% (0.26). Otherwise, multiply line 10 by 28% (0.28) and subtract $3,726 ($1,863 if married filing separately for 2016) from the result. Form 1040NR filers, see instructions.	11	82,141
12	Minimum tax foreign tax credit on exclusion items (see instructions)	12	
13	Tentative minimum tax on exclusion items. Subtract line 12 from line 11	13	82,141
14	Enter the amount from your 2016 Form 6251, line 34, or 2016 Form 1041, Schedule I, line 55	14	76,829
15	**Net minimum tax on exclusion items.** Subtract line 14 from line 13. If zero or less, enter -0-	15	5,312

For Paperwork Reduction Act Notice, see instructions.

Form 8801 (2017)

EEA

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Part II Minimum Tax Credit and Carryforward to 2018

16	Enter the amount from your 2016 Form 6251, line 35, or 2016 Form 1041, Schedule I, line 56	16	5,312
17	Enter the amount from line 15	17	5,312
18	Subtract line 17 from line 16. If less than zero, enter as a negative amount	18	
19	2016 credit carryforward. Enter the amount from your 2016 Form 8801, line 26	19	665
20	Enter your 2016 unallowed qualified electric vehicle credit (see instructions)	20	
21	Combine lines 18 through 20. If zero or less, stop here and see the instructions	21	665
22	Enter your 2017 regular income tax liability minus allowable credits (see instructions)	22	5,579
23	Enter the amount from your 2017 Form 6251, line 33, or 2017 Form 1041, Schedule I, line 54	23	0
24	Subtract line 23 from line 22. If zero or less, enter -0-	24	5,579
25	**Minimum tax credit.** Enter the smaller of line 21 or line 24. Also enter this amount on your 2017 Form 1040, line 54 (check box b); Form 1040NR, line 51 (check box b); or Form 1041, Schedule G, line 2c	25	665
26	**Credit carryforward to 2018.** Subtract line 25 from line 21. Keep a record of this amount because you may use it in future years	26	

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Form **8582**

Department of the Treasury
Internal Revenue Service (99)

Passive Activity Loss Limitations

▶ See separate instructions.
▶ Attach to Form 1040 or Form 1041.
▶ Go to www.irs.gov/Form8582 for instructions and the latest information.

OMB No. 1545-1008

2017

Attachment Sequence No. **88**

Name(s) shown on return: FRANK EASON & EDITH KERN EASON

Identifying number: [redacted]

Part I 2017 Passive Activity Loss

Caution: Complete Worksheets 1, 2, and 3 before completing Part I.

Rental Real Estate Activities With Active Participation (For the definition of active participation, see Special Allowance for Rental Real Estate Activities in the instructions.)

1a	Activities with net income (enter the amount from Worksheet 1, column (a))	1a	7,346	
b	Activities with net loss (enter the amount from Worksheet 1, column (b))	1b	(350)	
c	Prior years unallowed losses (enter the amount from Worksheet 1, column (c))	1c	( )	
d	Combine lines 1a, 1b, and 1c			1d 6,996

Commercial Revitalization Deductions From Rental Real Estate Activities

2a	Commercial revitalization deductions from Worksheet 2, column (a)	2a	( )	
b	Prior year unallowed commercial revitalization deductions from Worksheet 2, column (b)	2b	( )	
c	Add lines 2a and 2b			2c ( )

All Other Passive Activities

3a	Activities with net income (enter the amount from Worksheet 3, column (a))	3a		
b	Activities with net loss (enter the amount from Worksheet 3, column (b))	3b	( )	
c	Prior years' unallowed losses (enter the amount from Worksheet 3, column (c))	3c	( )	
d	Combine lines 3a, 3b, and 3c			3d

4	Combine lines 1d, 2c, and 3d. If this line is zero or more, stop here and include this form with your return; all losses are allowed, including any prior year unallowed losses entered on line 1c, 2b, or 3c. Report the losses on the forms and schedules normally used	4 6,996

If line 4 is a loss and:
- Line 1d is a loss, go to Part II.
- Line 2c is a loss (and line 1d is zero or more), skip Part II and go to Part III.
- Line 3d is a loss (and lines 1d and 2c are zero or more), skip Parts II and III and go to line 15.

Caution: If your filing status is married filing separately and you lived with your spouse at any time during the year, do not complete Part II or Part III. Instead, go to line 15.

Part II Special Allowance for Rental Real Estate Activities With Active Participation

Note: Enter all numbers in Part II as positive amounts. See instructions for an example.

5	Enter the smaller of the loss on line 1d or the loss on line 4			5
6	Enter $150,000. If married filing separately, see instructions	6		
7	Enter modified adjusted gross income, but not less than zero (see instructions)	7		
	Note: If line 7 is greater than or equal to line 6, skip lines 8 and 9, enter -0- on line 10. Otherwise, go to line 8.			
8	Subtract line 7 from line 6	8		
9	Multiply line 8 by 50% (0.50). Do not enter more than $25,000. If married filing separately, see instructions			9
10	Enter the smaller of line 5 or line 9			10 0

If line 2c is a loss, go to Part III. Otherwise, go to line 15.

Part III Special Allowance for Commercial Revitalization Deductions From Rental Real Estate Activities

Note: Enter all numbers in Part III as positive amounts. See the example for Part II in the instructions.

11	Enter $25,000 reduced by the amount, if any, on line 10. If married filing separately, see instructions	11	
12	Enter the loss from line 4	12	
13	Reduce line 12 by the amount on line 10	13	
14	Enter the smallest of line 2c (treated as a positive amount), line 11, or line 13	14	

Part IV Total Losses Allowed

15	Add the income, if any, on lines 1a and 3a and enter the total	15	
16	Total losses allowed from all passive activities for 2017. Add lines 10, 14, and 15. See instructions to find out how to report the losses on your tax return	16	0

For Paperwork Reduction Act Notice, see instructions.

Form 8582 (2017)

SEA

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Form **4562**

Department of the Treasury
Internal Revenue Service (99)

Depreciation and Amortization
(Including Information on Listed Property)

▶ Attach to your tax return.

▶ Go to *www.irs.gov/Form4562* for instructions and the latest information.

OMB No. 1545-0172

2017

Attachment Sequence No. **179**

Name(s) shown on return: FRANK EASON & EDITH KERN EASON

Business or activity to which this form relates: EASON TRUCKING

Identifying number: [redacted]

Part I Election To Expense Certain Property Under Section 179

Note: If you have any listed property, complete Part V before you complete Part I.

1	Maximum amount (see instructions)	1	
2	Total cost of section 179 property placed in service (see instructions)	2	
3	Threshold cost of section 179 property before reduction in limitation (see instructions)	3	
4	Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-	4	
5	Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions	5	

6	(a) Description of property	(b) Cost (business use only)	(c) Elected cost

7	Listed property. Enter the amount from line 29	7		
8	Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7		8	
9	Tentative deduction. Enter the smaller of line 5 or line 8		9	
10	Carryover of disallowed deduction from line 13 of your 2016 Form 4562		10	
11	Business income limitation. Enter the smaller of business income (not less than zero) or line 5 (see instructions)		11	
12	Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11		12	
13	Carryover of disallowed deduction to 2018. Add lines 9 and 10, less line 12 ▶	13		

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property.) (See instructions.)

14	Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year (see instructions)	14	26,774
15	Property subject to section 168(f)(1) election	15	
16	Other depreciation (including ACRS)	16	

Part III MACRS Depreciation (Don't include listed property.) (See instructions.)

Section A

17	MACRS deductions for assets placed in service in tax years beginning before 2017	17	32,478
18	If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here ▶ ☐		

Section B - Assets Placed in Service During 2017 Tax Year Using the General Depreciation System

	(a) Classification of property	(b) Month and year placed in service	(c) Basis for depreciation (business/investment use only-see instructions)	(d) Recovery period	(e) Convention	(f) Method	(g) Depreciation deduction
19a	3-year property						
b	5-year property Statement #2						5,355
c	7-year property						
d	10-year property						
e	15-year property						
f	20-year property						
g	25-year property			25 yrs.		S/L	
h	Residential rental property			27.5 yrs.	MM	S/L	
				27.5 yrs.	MM	S/L	
i	Nonresidential real property			39 yrs.	MM	S/L	
					MM	S/L	

Section C - Assets Placed in Service During 2017 Tax Year Using the Alternative Depreciation System

20a	Class life				S/L	
b	12-year		12 yrs.		S/L	
c	40-year		40 yrs.	MM	S/L	

Part IV Summary (See instructions.)

21	Listed property. Enter amount from line 28	21	
22	Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter here and on the appropriate lines of your return. Partnerships and S corporations - see instructions	22	64,607
23	For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs	23	

For Paperwork Reduction Act Notice, see separate instructions.

Form 4562 (2017)

EEA

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Federal Supporting Statements

2017 PG01

Name(s) as shown on return: FRANK EASON & EDITH KERN EASON

Your Social Security Number: [redacted]

Schedule E - Line 19 - Other Expenses

Statement #1

Other Expenses	Property A	Property B	Property C
OFFICE	882		
SUNDRY	13		
RENT	55,138		
Total	56,033		

PG01

Form 4562 - Line 19b

Statement #2

Basis	RP	CV	Method	Deduction
18,550	5	HY	200 DB	3,710
8,224	5	HY	200 DB	1,645
Total				5,355

STATMENT.LC

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STATE OF SOUTH CAROLINA
DEPARTMENT OF REVENUE

2017 INDIVIDUAL INCOME TAX RETURN

SC1040
(Rev. 10/5/17)
3075

Your social security number	Check if deceased ☐
[redacted]	
Spouse's social security number	Check if deceased ☐
[redacted]	

DO NOT USE THIS FORM TO FILE A CORRECTED RETURN. SEE SC1040 INSTRUCTIONS FOR ADDITIONAL INFORMATION.

For the year January 1 - December 31, 2017, or fiscal tax year beginning 2017 and ending 2018

Print your first name and initial: FRANK	Last name: EASON	Suff.
Spouse's first name, if married filing jointly: EDITH	Last name: KERN EASON	
Check if new address ☐ Mailing address (number and street, Apt. no or P.O. Box) Foreign address, see instructions: 488 OLD CARRIAGE ROAD		County code: 46
City: CLOVER	State: SC / Zip: 29710	Area code Daytime telephone: 704-302-4905
Check if address is outside US ☐ Foreign country address including Postal code (see instructions)		

Check this box if you are filing SC Schedule NR (Part-year/Nonresident) ▶ ☐

Check this box ONLY if filing a composite return on behalf of a partnership or "S" corporation. Do not check this box if you are an individual. ▶ ☐

Check this box if you have filed a federal or state extension ▶ ☐

Check this box if you served in a Military COMBAT ZONE during the filing period ☐

Enter the name of the combat zone:

Check this box if this return is affected by a federally declared DISASTER AREA ☐

Enter the name of the disaster area:

CHECK YOUR FEDERAL FILING STATUS
(1) ☐ Single
(2) ☒ Married filing jointly
(3) ☐ Married filing separately. Enter spouse's SSN here:
(4) ☐ Head-of-household
(5) ☐ Widow(er) with dependent child

Federal Exemptions

Enter the number of exemptions from your 2017 federal return ▶ 4

Enter the number of exemptions listed above that were under the age of 6 years on December 31, 2017 ▶

Enter the number of taxpayers age 65 or older, as of December 31, 2017 ▶

Dependents:

First name	Last name	Social security number	Relationship	Date of birth (MM/DD/YYYY)
MYRA	BEAN	[redacted]	DAUGHTER	10/03/1999
CASSIDY	BEAN	[redacted]	DAUGHTER	02/14/2002

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EASON

[redacted]

INCOME AND ADJUSTMENTS

2017

					Dollars	
1	Enter federal taxable income from your federal form. If zero or less, enter zero here. Nonresident filers complete Schedule NR and enter total from line 50 on line 5 below			1	50,078	00
ADDITIONS TO FEDERAL TAXABLE INCOME						
a	State tax addback, if itemizing on federal return (See instructions)	a	16,672 00			
b	Out-of-state losses (See instructions) Type:	b	00			
c	Expenses related to National Guard and Military Reserve income	c	00			
d	Interest income on obligations of states and political subdivisions other than South Carolina	d	00			
e	Other additions to income. Attach an explanation (See instructions)	e	00			
2	Add lines a through e and enter the total here. These are your total additions			2	16,672	00
3	Add lines 1 and 2 and enter the total here			3	66,750	00
SUBTRACTIONS FROM FEDERAL TAXABLE INCOME					Dollars	
f	State tax refund, if included on your federal return	f	3,500 00			
g	Total and permanent disability retirement income, if taxed on your federal return	g	00			
h	Out-of-state income/gain - Do not include personal service income (See instructions) Check type of income/gain: ☐ Rental ☐ Business ☐ Other	h	00			
i	44% of net capital gains held for more than one year (See instructions)	i	00			
j	Volunteer deductions (See instructions) Type:	j	00			
k	Contributions to the SC College Investment Program ("Future Scholar") or the SC Tuition Prepayment Program (See instructions)	k	00			
l	Active Trade or Business Income deduction (See instructions)	l	30,338 00			
m	Interest income from obligations of the US government	m	00			
n	Certain nontaxable National Guard or Reserve Pay (See instructions)	n	00			
o	Social security and/or railroad retirement, if taxed on your federal return	o	00			
p	Retirement Deduction (See instructions)					
p-1	Taxpayer: date of birth	p-1	00			
p-2	Spouse: date of birth	p-2	00			
p-3	Surviving spouse: date of birth of deceased spouse	p-3	00			
	Military Retirement Deduction (See instructions)					
p-4	Taxpayer: date of birth	p-4	00			
p-5	Spouse: date of birth	p-5	00			
p-6	Surviving spouse: date of birth of deceased spouse	p-6	00			
q	Age 65 and older deduction (See instructions)					
q-1	Taxpayer: date of birth	q-1	00			
q-2	Spouse: date of birth	q-2	00			
r	Negative amount of federal taxable income	r	00			
s	Subsistence allowance days @ $8.00	s	00			
t	Dependents under the age of 6 years on December 31 of the tax year	t	00			
u	Consumer Protection Services	u	00			
v	Other subtractions (See instructions) FD/ST Depr Diff	v	16,461 00			
4	Add lines f through v and enter here. These are your total subtractions			4	< 50,299	00
5	Residents subtract line 4 from line 3 and enter the difference. Nonresidents enter amount from Schedule NR, line 50. If less than zero, enter zero here. This is your South Carolina INCOME SUBJECT TO TAX			5	16,451	00
6	TAX: enter tax from SOUTH CAROLINA tax tables	6	653 00			
7	TAX on Lump Sum Distribution (Attach SC4972)	7	00			
8	TAX on Active Trade or Business Income (Attach I-335)	8	910 00			
9	TAX on excess withdrawals from Catastrophe Savings Accounts	9	00			
10	Add lines 6 through 9 and enter the total here. This is your TOTAL SOUTH CAROLINA TAX			10	1,563	00
11	Child and Dependent Care (See instructions)	11	00			
12	Two Wage Earner Credit (See instructions)	12	164 00			
13	Other non-refundable credits. Attach SC1040TC and other state return(s)	13	00			
14	TOTAL non-refundable credits. Add lines 11 through 13 and enter the total here			14	164	00
15	SUBTRACT line 14 from line 10. Enter the difference BUT NOT LESS THAN ZERO here			15	1,399	00

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EASON [redacted] 2017

PAYMENTS AND REFUNDABLE CREDITS

16 SC INCOME TAX WITHHELD (Attach W-2 or SC41)	5,582	00	Other refundable credit(s)		
17 2017 estimated tax payments		00	22a Anhydrous Ammonia (Attach I-333)		00
18 Amount paid with extension		00	22b Milk Credit (Attach I-334)		00
19 NR sale of real estate		00	22c Classroom Teacher Expenses (Attach I-360)		00
20 Other SC withholding (Attach Form 1099)		00	22d Parental Refundable Credit (EGENC)		00
21 Tuition tax credit (Attach I-318)		00	22 Total other refundable credit(s)		00

23 Add lines 16 through 22 and enter the total here ... These are your TOTAL PAYMENTS	23	5,582	00
24 If line 23 is LARGER than line 15, subtract line 15 from line 23 and enter the OVERPAYMENT	24	4,183	00
25 If line 15 is LARGER than line 23, subtract line 23 from line 15 and enter the AMOUNT DUE	25		00
26 USE TAX due on internet, mail-order or out-of-state purchases ▶ 26		0	00
Use tax is based on your county's sales tax rate. See instructions for more information. If you certify that no use tax is due, check here ▶ [X]			
27 Amount of line 24 to be credited to your 2018 Estimated Tax ▶ 27			00
28 Total Contributions for Check-offs (Attach I-330) ▶ 28			00
29 Add lines 26 through 28 and enter the total here	29		00
30 If line 29 is larger than line 24, go to line 31. Otherwise, subtract line 29 from line 24 and enter the AMOUNT TO BE REFUNDED TO YOU (line 30a check box entry is required) ... REFUND ▶	30	4,183	00

REFUND OPTIONS (subject to program limitations)

30a Mark one refund choice: ▶ [ ] Direct Deposit (30b required) ▶ [ ] Debit Card* ▶ [ ] Paper Check

*SCDOR Income Tax Refund Prepaid Debit Card issued by Bank Of America

30b Direct Deposit (for US Accounts Only) Type: [ ] Checking [ ] Savings

Routing Number (RTN) [ ] Must be 9 digits. The first two numbers of the RTN must be 01 through 12 or 21 through 32

Bank Account Number (BAN) [ ] 1-17 digits

31 Tax Due: Add lines 25 and 29. If line 29 is larger than line 24, subtract line 24 from line 29 and enter the amount	31		00
32 Late filing and/or late payment: Penalties _____ Interest _____ (See instructions) Enter total here ▶	32		00
33 Penalty for Underpayment of Estimated Tax (Attach SC2210) (See instructions and enter letter in box if applicable) Exception to Underpayment of Estimated Tax [ ] ▶	33		00
34 Add lines 31 through 33 and enter the AMOUNT YOU OWE here ... BALANCE DUE ▶	34		00

Pay electronically free of charge at MYDORWAY.dor.sc.gov with Visa, MasterCard or by Electronic Funds Withdrawal (EFW).

I declare that this return and all attachments are true, correct and complete to the best of my knowledge and belief.

Your signature	Date 05-23-2018	Spouse's signature (if married filing jointly, BOTH must sign)
Taxpayer's Email		
I authorize the Director of the SC Department of Revenue or delegate to discuss this return, attachments and related tax matters with the preparer.	Yes [ ] No [X]	Preparer's printed name

If prepared by a person other than the taxpayer, his declaration is based on all information of which he has any knowledge.

Paid Preparer's Use Only				
Preparer signature		Date 05-23-2018	Check if self-employed [ ]	PTIN P01300718
Firm name (or yours if self-employed) and address and Zip Code	PATRICK J COLEMAN CPA PLLC 6500 BALLYBAY DRIVE Charlotte NC 28278			FEIN 26-1224550 Phone No. 704-302-4905

MAIL TO: REFUNDS OR ZERO TAX — SC1040 Processing Center, PO Box 101100, Columbia, SC 29211-0100

BALANCE DUE — Taxable Processing Center, PO Box 101105, Columbia, SC 29211-0105

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*****KEEP FOR YOUR RECORDS*****

TWO WAGE EARNER CREDIT WHEN BOTH SPOUSES WORK

Your filing status must be married filing jointly to claim this credit.

Line 12 TWO WAGE EARNER CREDIT (MARRIED COUPLE)
This credit can only be claimed by a married couple filing jointly when both spouses have earned income taxed to South Carolina. This credit is not allowed on returns with a filing status of single, married filing separately or head of household. Do not include gambling or bingo winnings reported on federal form W-2G.

Example - You earned a salary taxed to South Carolina of $20,000. Your spouse earned $17,000 taxed to South Carolina and had an IRA deduction taxed to South Carolina of $1,000. Your SC qualified earned income is $20,000 and your spouse's is $16,000 ($17,000 minus $1,000). Because your spouse's qualified earned income is less than yours, the credit is based on your spouse's income. Therefore, the credit is $112 ($16,000 x .007).

Compute your earned income separately for yourself and your spouse. South Carolina earned income is generally income you receive for services you provide. It includes wages, salaries, tips, commissions and sub-pay. It also includes income earned from self-employment, business income or loss, partnership income or loss, farm income or loss and any other earned income taxed to South Carolina. Earned income does not include gambling or bingo winnings, interest, dividends, Social Security benefits, IRA distribution, unemployment compensation, deferred compensation or non-taxable income. It also does not include any amount your spouse paid you.

	(a) You	(b) Your Spouse
1. Wages, salaries, tips, etc., taxed to South Carolina from South Carolina Schedule NR, Column B, line 1 or federal form (Do not include pensions or annuities.)	68,750	23,400
2. Net profit or (loss) from self-employment (from Schedule C and on Schedule K-1 of Form 1065) and any other earned income taxed to South Carolina.	65,174	0
3. Add lines 1 and 2. This is your total earned income taxed to SC.	133,924	23,400

South Carolina qualified earned income. This is the amount on which the credit is based. Compute it by subtracting certain adjustments from South Carolina earned income. The adjustments are:

- Deductible part of self-employment tax
- Self-employed SEP, simple, and qualified plans
- Self-employed health insurance deduction
- IRA deduction
- Repayment of sub-pay

4. Add the adjustment amounts entered on federal Form 1040. If filing South Carolina Schedule NR, enter amounts from lines 21, 22, 23, 26 and any repayment of supplemental unemployment benefits (sub-pay) allocable to South Carolina income.	4,497	0
5. Subtract line 4 from line 3. This is your qualified earned income taxed to South Carolina. If the amount in column (a) or (b) is zero (-0-) or less, stop here. You may not take this credit.	129,427	23,400

Compute the credit.

6. Enter the smaller of 5(a) or 5(b). Do not enter more than $30,000.		23,400
7. Multiply the amount on line 6 by .007. Do not enter more than $210. Enter the amount here and on SC1040, line 12.		164

SCW_WKS.LT

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1024 [redacted]

*****KEEP FOR YOUR RECORDS*****

Line a STATE TAX ADDBACK, IF ITEMIZING ON FEDERAL RETURN

If you deducted state and local income taxes or general sales taxes while itemizing on your 2017 federal income tax return, you are required to add all or part of this amount to federal taxable income to arrive at your South Carolina taxable income. Use the worksheet below to figure the adjustment. (Keep this worksheet for your records.)

Worksheet A State Tax Adjustment

1. Itemized deductions from 2017 federal Form 1040, Schedule A lines 4, 9, 15, 19, 20, 27 and 28.	1.	35,381
2. Enter allowable federal standard deduction you would have been allowed if you had not itemized. (Enter zero if married filing separate [MFS] returns – See federal instructions)	2.	12,700
3. Subtract line 2 from line 1. (Enter zero if line 2 is greater than line 1.)	3.	22,681
4. Enter the amount of state and local income taxes or general sales taxes from federal Schedule A.	4.	16,672
5. The lesser of line 3 or line 4. Enter this amount on SC1040 line a	5.	16,672

SCIT_WKS.LD SC1040

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1024

STATE OF SOUTH CAROLINA
DEPARTMENT OF REVENUE

ACTIVE TRADE OR BUSINESS INCOME REDUCED RATE COMPUTATION

(Complete one I-335 for each return)
(Attach I-335 and all supporting Worksheets to SC1040 or SC 1041)

I-335
(Rev. 10/5/17)
3410
2017

For the year January 1 - December 31, 2017, or fiscal tax year beginning 2017 and ending 2018

Print your name: FRANK EASON
Your Social Security number: [redacted]
Spouse's first name: EDITH
Spouse's Social Security number: [redacted]

1a.	Enter amount from Worksheet 1, line 3	1a. $ 60,677.00
1b.	Enter total of amounts from Worksheets 2, line 22, Column C	1b. $ .00
1c.	Add lines 1a and 1b	1c. $ 60,677.00
2a.	Enter any adjustments necessary because of at-risk rules, South Carolina net operating losses, and/or passive activity losses. <Enter in brackets if the adjustment is negative.> Enter -0- if no adjustments are necessary	2a. $ .00
2b.	Enter the deductible part of self-employment tax from your federal return on partnership income related to South Carolina. Do not include the amount on line 2 of Worksheet 1	2b. $ .00
2c.	Line 2a minus line 2b. <Enter in brackets if negative.>	2c. $ .00
3.	Add lines 1c and 2c. If zero or negative, STOP - DO NOT PROCEED	3. $ 60,677.00
4.	Enter amounts reasonably related to personal services of the taxpayer, the taxpayer's spouse, or any person claimed as dependent on the taxpayer's income tax return (see instructions for Rules for Using Safe Harbor). Do not include amounts from W-2s or guaranteed payments for personal services	4. $ 30,339.00
	☒ Check here if using Safe Harbor	
5.	Subtract line 4 from line 3. If greater than zero, enter on SC1040, line (I); Schedule NR, line 39; or SC1041, Part I, line 2d. If zero or negative, STOP - DO NOT PROCEED	5. $ 30,338.00
6.	Tax Year 2017 rate on qualifying active trade or business income	6. 3% (.03)
7.	Multiply line 5 by line 6 (enter here and on SC1040, line 8; or on SC1041, line 8)	7. $ 910.00

NOTE: A taxpayer may decide annually to have eligible "active trade or business income" taxed at the reduced rate under SC Code Section 12-6-545 or continue to use the standard graduated 3% to 7% rates under SC Code Section 12-6-510 to compute South Carolina tax. For taxpayers filing a joint return, the election to use the reduced rate in SC Code Section 12-6-545 is effective for both taxpayers.

34101022

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RESPONSE TO REQUEST TO PRODUCE #14

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ELECTRONICALLY FILED - 201[illegible] 4:27 PM - YORK [illegible] COMMON PLEAS - CASE#2017CP[illegible]

[redacted]

07/07/2015

PAY TO THE ORDER OF Mark Pafford $ [redacted]

Six hundred seventy-eight and 37/100 DOLLARS

Mark Pafford

#029874# [illegible]

Expense Money (Hotel - Meals & Tickets)

[redacted]

09/04/2015

PAY TO THE ORDER OF Mark Pafford $ [redacted]

Seven hundred eighty-one and 65/100 DOLLARS

Mark Pafford

#029938# [illegible]

Expense Money
(Hotel - Meals & Tickets)

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ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Your Copy

COPY

30461

Rock City

8/10/2016

PAY TO THE ORDER OF Mark Pafford $ **147.20

One Hundred Forty-Seven and 20/100** DOLLARS

Mark Pafford

MEMO misc. receipts

⑈030461⑈ ⑆253279653⑆0000000253⑈

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ELECTRONICALLY FILED - 2018 Apr 04 4:27 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

3047

Rock City [illegible]
181 North [illegible]
Rock Hill, S.C. [illegible]

8/8/2018

PAY TO THE ORDER OF Mark Pafford $ **77.64

Seventy-Seven and 64/100** DOLLARS

Mark Pafford

MEMO

⑈030178⑈ ⑆053279659⑆ 0000000064⑈

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RESPONSE TO REQUEST TO PRODUCE #17

OFFICE OF THE SHERIFF

YORK COUNTY, SOUTH CAROLINA

1675-2A York Highway • York, SC • 29745-7430

Phone: (803) 628-3059 • www.yorkcountysheriff.com • FAX: (803) 628-3075

Kevin R. Tolson, *Sheriff*

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

September 7, 2017

Robert Duncan
154 N. Anderson Rd.
Rock Hill, SC 29730

Re: 2017-32049
Trespassing/ Mark Pafford

Dear Robert Duncan:

Be advised that the above named defendant was arrested pursuant to a case which you were the victim and/or witness.

A trial date is set for 9/27/2017 at 8:00 AM in Rock Hill Magistrate Court located at 529 S. Cherry Rd., Rock Hill, South Carolina.

It is important to the disposition of this case that you are present for this hearing. We understand that the victim and defendant often work out their problem before the court hearing and therefore, the victim does not feel the need to appear in court. Be advised that cases are not automatically dropped because victims fail to appear in court. If you fail to appear, the trial may be postponed until you can be ordered by the court to appear. If you wish to seek restitution from the defendant, you should contact our office prior to your court date to ensure that you have the paperwork that will be required.

Each case is unique to the parties involved. Robyn Crews is the Victim Advocate assigned to your case. She can provide you with more specific information about your case; and if you desire, will be in court with you when your case is heard. Please do not hesitate to contact Ms. Crews if she can be of any assistance. She may be reached at (803) 818-6835 or (803) 327-2021.

Sincerely,

York County Sheriff's Office
Victims Assistance Unit

bj

STATE OF SOUTH CAROLINA

COUNTY OF YORK

Robert Duncan
154 N Anderson Road
Rock Hill, SC 29732

STATE	vs	**Mark Giles Pafford**
Case #		**5102P0819555**
Charge		**Trespassing / Entering premises after warning or refusing to leave on request**

SUMMARY COURT NOTIFICATION

Dear Sir/Madam:

Court records indicate that you are a victim in the above referenced case. This case is scheduled for a Bench Trial on September 27, 2017 beginning at 8:00 AM. This trial will be held in the

Catawba/Ebenezer Magistrate
529 South Cherry Road
Rock Hill, SC

You are being notified of this hearing as required by the laws of the State of South Carolina, State Statute 16-3-1535.

Catawba/Ebenezer Magistrate

Catawba/Ebenezer Magistrate
529 South Cherry Road
Rock Hill, SC 29730
Phone: (803) 909-7600
Fax: (803) 909-7606

September 5, 2017

MC35

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STATE OF SOUTH CAROLINA

COUNTY OF YORK

Robert Duncan
154 N Anderson Road
Rock Hill, SC 29732

STATE	vs	**Mark Giles Pafford**
Case #		**5102P0819555**
Charge		**Trespassing / Entering premises after warning or refusing to leave on request**

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Catawba/Ebenezer Magistrate

Catawba/Ebenezer Magistrate
529 South Cherry Road
Rock Hill, SC 29730
Phone: (803) 909-7600
Fax: (803) 909-7606

September 5, 2017

MC35

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

OfficerID: hoffmanj, Narrative

2017-30034

2017-00030034 JL Hoffman; Duncan & Pafford; Supplement to Update Information on Report:

Mr. Pafford was advised by Detectives Hoffman and Strickland that he is given notice not to be on the propriety of Robert Duncan located at 1215 S. Parham Road, York SC 29745. Mr. Pafford stated that he understood. This notice occurred during an interview at MJC Detention on 08-16-2017.

Mr. Pafford admitted during the interview that he cut a lock inside a building on the listed property and that he also cut a lock and cable securing a gate to the driveway.

Mr. Pafford was charged for damage to property and further investigation is underway.

Kw/ml 1/16/18

OfficerID: oliverw, Narrative

2017-30034

On 08/16/2017 I responded to 1215 South Parnham Road in reference to damage to property. Robert Duncan (property owner) called and advised that he was watching 2 white males break into his garage and driving away in his truck. I met with Mark Giles Pafford who was driving a Peterbuilt commercial tow truck at the entrance to 1215 South Parnham Road. Mark advised that he was here to get his truck that he owns the Peterbuilt truck that he is driving. Mark then provided me with the South Carolina Title to the truck with his name on it. Mark advised that Robert was going to buy the truck but came to his residence back in July and took the truck from his property. Mark advised that he had a Deputy respond out to his residence in reference to his truck being missing. Mark stated that he was advised that there was nothing that could be done. Mark advised that he was here to get his truck back. Mark did admit to going into Robert's building through an unlocked door and then cutting the lock on the door ($20) to get the truck out of the building. I then spoke with Daniel who assisted Mark with retrieving the truck. Daniel advised that Mark showed him a title so he was just here helping Mark get his truck back. Daniel advised that he knows mark though his father's church. Daniel advised that his father is a pastor and is the one that drove them here to get the truck

I then spoke with Larry Soles who advised that he drove Mark and Daniel here to get Mark's truck. Larry advised that he only knew that Mark had a title to a truck and they were coming to get Mark's truck. Larry advised that he did drive them here and did not know any more information about this situation. I then spoke with property owner Robert Duncan who advised that he observed Daniel and Mark on his cameras walk up his driveway and go into his building. Robert advised that he observed them drive the truck out of the building and down the driveway. Robert then advised that he bought the truck from Mark and has a bill of sale on the vehicle. Robert did not provide me with that information while on scene. I then placed Mark and Daniel under arrest for damage to property and transported them to YCDC without further incident.

Kw/ml 8/17/17

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Case Report

Summary

Print Date/Time: 01/16/2018 11:09
Login ID: lowerym
Case Number: 2017-00030034

ORI Number: York County Sheriff's Office SC0460000

Case

Case Number: 2017-00030034
Location: 1215 S PARAHAM RD YORK, SC 29745
Reporting Officer ID: 05258 - Oliver

Incident Type: Mal. Dest. of Property - 1077B
Occurred From: 08/16/2017 13:10
Occurred Thru: 08/16/2017 13:10
Disposition: Closed by Arrest
Disposition Date: 08/16/2017
Reported Date: 08/16/2017 13:10 Wednesday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	220	16-11-0311	Burglary-First Degree	1
2	State	290	16-11-510	Mal Injury To Personal Property >$200	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	Pafford, Mark Giles	2535 FERGUSON DR ROCK HILL, SC 29730	(803)417-9228	White	Male	07/29/1955 62
Suspect	2	Soles, Daniel Jason	1806 SPRINGSTEEN RD ROCK HILL, SC 29730	(803)329-5042	White	Male	08/01/1981 36
Victim	1	Duncan, Robert Wayne, Jr	1215 S PARAHAM RD YORK, SC 29745	(803)628-2023	White	Male	11/01/1971 45
Witness	1	Soles, Larry Dale	1806 SPRINGSTEEN RD ROCK HILL, SC 29730	(803)328-3000	White	Male	10/20/1952 64

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
29151 A	Soles, Daniel Jason	1215 S PARAHAM RD YORK, SC 29745	08/16/2017 14:22	On-View Arrest	36
29152 A	Pafford, Mark Giles	1215 S PARAHAM RD YORK, SC 29745	08/16/2017 14:22	On-View Arrest	62

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.

Vehicles

No.	Role	Vehicle Type	Year	Make	Model	Color	License Plate	State
1	Suspect Vehicle	Pickup Truck	2012	Chevrolet	SLV	White		

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RESPONSE TO REQUEST TO PRODUCE #17

ELECTRONICALLY FILED - 2019 Feb 11 3:37 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

Subject: Re: 17-2487 Mark Giles Pafford v. Robert Dwayne Duncan, Jr., et al
From: John Martin Foster <jmfoster@comporium.net>
Date: 11/30/18, 8:58 AM
To: Steve Schusterman <sdslaw@comporium.net>
CC: Allison Schusterman <allison@schustermanlawfirm.com>

Steve:

This case needs to move forward. You sent discovery in August. The tax returns have not been filed. Rumor has it that your clients are dissolving the business.

Unless we have satisfactory responses within 20 days, I must move to compel.

I also ask your cooperation in setting up a Scheduling Order. Please get me some dates.

-- Martin Foster

JMFOSTER@COMPORIUM.NET

THE GUARDIAN BUILDING 223 EAST MAIN STREET SUITE 520 ROCK HILL, SC 29730

P.O. BOX 106 ROCK HILL, SC 29731-6106

803 324-8100 803 324-8109: FAX

PRIVILEGED AND CONFIDENTIAL: This electronic message and any attachments are confidential property of the sender. The information is intended only for the use of the person to whom it was addressed. Any other interception, copying, accessing, or disclosure of this message is prohibited. The sender takes no responsibility for any unauthorized reliance on this message. If you have received this message in error, please immediately notify the sender and purge the message you received. Do not forward this message without permission.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any US federal tax advice contained in this document is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code Section 6662(d) or (ii) promoting, marketing or recommending to another party any transaction or matter that is contained in this document.

STATE OF SOUTH CAROLINA	]	IN THE COURT OF COMMON PLEAS
	]	
COUNTY OF YORK	]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,	]	
	]	
Plaintiff,	]	AFFIDAVIT AS TO MOTION
v.	]	
	]	FOR ORDER COMPELLING DISCOVERY
ROBERT WAYNE DUNCAN, Jr.,	]	
ROBERT DUNCAN, Sr., and	]	AND FOR EXPENSES OF MOTION
FRANK EASON, d/b/a	]	
"Rock City Heavy Hauling, Inc.",	]	C.A. No. 2017-CP-46-02487
	]	
Defendants.	]	
	]	

PERSONALLY appeared before me, a notary public, the undersigned affiant, who being duly sworn, deposes and says:

1. The affiant is an attorney licensed to practice law in the State of South Carolina;
2. The facts stated in the attached Notice and Motion above are true of his knowledge, and, as to those matters stated on information and belief, he is informed and believes them to be true.

John Martin Foster
Affiant

Sworn to and subscribed before
me on February 11, 2019.

Ellen N. Smith
NOTARY PUBLIC FOR SOUTH CAROLINA
My commission expires: 03/04/2024

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STATE OF SOUTH CAROLINA	]	IN THE COURT OF COMMON PLEAS
	]	
COUNTY OF YORK	]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,	]	
	]	
Plaintiff,	]	
v.	]	
	]	
ROBERT WAYNE DUNCAN, Jr.,	]	
ROBERT DUNCAN, Sr., and	]	
FRANK EASON, d/b/a	]	
"Rock City Heavy Hauling, Inc.",	]	C.A. No. 2017-CP-46-02487
	]	
Defendants.	]	

By his Request for Production dated June 7, 2018, the Plaintiff requested the production of:

12. The personal and business, State and Federal, Income Tax Returns of any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." for the years 2016 and 2017.

By in their response to the Request above, dated August 10, 2018, the Defendants stated:

> RESPONSE: Robert Duncan, Jr. - Tax returns have been prepared but they have not been release d by Yarborough, Certified Public Accountant, therefore Duncan, Jr. does not have possession of them nor access to them.
> Rock City Heavy Haul, Inc,2016/2017 tax returns not filed.
> Robert Duncan, Sr. 2016 Federal Return attached
> Eason, 2017 Federal Return attached

By e-mail dated November 30, 2018, counsel for Plaintiff made demand for a full response to Request for Production No. 12. No such response has been received. By a recent letter, counsel for Defendant restated the response above.

No objection to the production requested has been made. No Motion for protection against such production has been made. It is the general rule that in the absence of objection or

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protection, the documents requested must be produced. *See, e.g., Beirnat* v. *Powell*, 757 S.W.2d 115 (Tex.App. Houston (1st Dist.) (1988).

In this regard, the Plaintiff would also note the standard instruction contained within his Request for Production:

> F. Inability to provide document(s). If you cannot provide any or all of the documents requested, after exercising due diligence to do so, provide any documents available and state your inability to provide the documents or the remainder of them (including a list of sources which were consulted for a response), and state whatever information or knowledge you have concerning the present location of the document(s) and the identity of its present custodian.

No recitation of sources consulted, or attempts made, to effect production of the returns exists.

If it is assumed that production of tax returns is objectionable, even in light of the Defendants' failure to oppose, the Plaintiff cites *Paramount Film Distributing Corp.* v. *Ram*, 91 F.Supp. 778 (D.S.C. 1950) where such discovery was specifically allowed as relevant. The Plaintiff would note that the existence of a corporate entity in this case is in dispute, as well as the parties' relation to the business of "Rock City Heavy Hauling"; tax returns are directly relevant to those questions.

The Defendants would seem to demur on the basis that the said documents (or some of them) are not within their possession. It is true that Rule 34(a), S.C.R.C.P. requires that documents must be in the possession, custody or control of a party to be discoverable. In interpreting this Rule's language, the Commentators of AMERICAN JURISPRUDENCE 2D have, however, stated:

> However, a party need not have actual possession of documents to be required to produce them. The true test is whether the party has a legal right to control or obtain the documents. Production may be ordered when a party has the legal right to obtain papers, even though he or she has no copy, and regardless of whether a paper is beyond the jurisdiction of the court.
>
> [23 AM.JUR.2D *Depostions and Discovery* § 149; footnotes omitted.]

The Defendants obviously have the legal right to their tax return in the possession of a

ELECTRONICALLY FILED - 2019 Feb 27 3:35 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

third party. The problem here is either a failure to pay a bill, or theft by the third party accountant named. Neither is an excuse preventing production. *See, e.g., Franzen* v. *Dunbar Builders Corp.*, 132 Ill.App.2d 701, 270 N.E.2d 118 (Ill.App. 1971).

Rule 37(a)(2), S.C.R.C.P. provides, in relevant part:

> If . . . a party, in response to a request for inspection submitted under Rule 34, . . . fails to permit inspection as requested, the discovering party may move for an order compelling an answer, or a designation, or an order compelling inspection in accordance with the request.

In the absence of prepared returns, this Court has the authority to compel disclosure of the Defendants' raw financial data. The Plaintiff is willing to enter into an Order for Protection for the documents so produced. In the alternative to such a resolution, the Plaintiff will be forced to wait some indeterminate period before the returns are produced, or to proceed to trial without completing discovery. Neither outcome is proper under our Rules of Civil Procedure, on in accordance with due process.

/s/ John Martin Foster
Attorney for Plaintiff
SC Bar No. 2086

The Guardian Building
223 East Main Street, Suite 520
Rock Hill, S.C. 29730

Post Office Box 106
Rock Hill, SC 29731-6106

803-324-8100
803-324-8109: Fax
jmfoster@comporium.net

February 27, 2019

Rock Hill, South Carolina

/home/jmfoster/Documents/Pafford/BriefPafford.odt

ELECTRONICALLY FILED - 2019 Feb 27 3:35 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	SIXTEENTH JUDICIAL CIRCUIT
COUNTY OF YORK	)	
	)	
	)	
Mark Giles Pafford	)	Case No: 2017 CP 46-2487
Plaintiff	)	
	)	
	)	
	)	
vs.	)	**DEFENDANTS MEMORANDUM IN OPPOSITION TO PLAINTIFFS MOTION TO COMPEL**
	)	
	)	
	)	
	)	
Robert Dwayne Duncan, Jr. Robert Wayne Duncan, Sr. and Frank Eason d/b/a "Rock City Heavy Hauling, Inc."	)	
Defendants.	)	
	)	

This Memorandum of Law is submitted in response to Plaintiff's Motion to Compel and supporting Memorandum.

The Defendant was served with production requests on or about June 7, 2018. The request at issue is as follows:

12. The personal and business, State and Federal, Income Tax Returns of any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." for the tax years 2016-2017.

The Defendants responded on or about August 10, 2018 as follows:

> RESPONSE: Robert Duncan, Jr. Tax returns have been prepared but they have not been released by Yarborough, Certified Public Accountant, therefore, Duncan, Jr. does not have possession of them nor access to them.
> Rock City Heavy Haul, Inc. 2016/2017 tax returns not filed.
> Robert Duncan, Sr., 2016 Federal Return attached
> Eason, 2017 Federal Return attached.

On November 30, 2018, counsel for Plaintiff sent an email to counsel for Defendant. Although counsel for Plaintiff indicates in his brief that he made demand for a full response to

ELECTRONICALLY FILED - 2019 Feb 28 9:50 AM - YORK - COMMON PLEAS - CASE#2017CP4602487

Request for Production No.12, his email does not reflect this demand. Counsel acknowledges in his email that the tax returns have not been filed.

The Defendants are not claiming an objection or that such returns are privileged, rather they either have not been prepared and are non-existent or as indicated in the Response the Defendant Duncan, Jr. accountant, Yarborough, Certified Public Accountant has refused to release the returns.

At this point, the Defendants do not have a "legal right" to obtain the tax returns as the returns are considered "work product" of the certified public accountant until fees are paid to the accountant. Yarborough is governed by North Carolina law. Pursuant to 21 NCAC 08N .0305, Yarborough only has an obligation to return client-provided records, not his work product until payment is received. Yarborough and Defendants are in a dispute as to the proper fee for the preparation and filing of the returns. At this time, based upon information and belief, Yarborough is demanding $6,000.00 for the release of the tax records. Requiring the Defendants to pay this amount in order to produce the requested tax returns would be overly burdensome and expensive taking into account the needs of the case. SCRCP Rule 26. Requiring the Defendants to pay the funds to the CPA to allow release of the requested documents would greatly prejudice the Defendants in any cause of action they may have against the CPA.

The issues in this case revolves around a dispute as to whether the Defendants have paid the entire amount to the Plaintiff for the purchase of a trailer and an allegation that the Defendants have failed to pay wages to the Plaintiff. Defendants have never asserted that they have the inability to pay the Plaintiff wages; rather the Defendants assert that all wages have been paid to the Plaintiff. Therefore, the necessity of the tax returns is irrelevant to this action. Arguably, the only tax return that would be relevant would be the business entities tax return as

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that is who the Plaintiff worked as a subcontractor for. The Plaintiff never worked for the individual Defendants.

Plaintiff's Memorandum also refers to the "standard instruction contained within his Request for Production:

> F. Inability to provide document(s). If you cannot provide any or all of the documents requested, after exercising due diligence to do so, provide any documents available and state your inability to provide the documents or the remainder of them (including a list of sources which were consulted for a response), and state whatever information or knowledge you have concerning the present location of the document(s) and the identity of its present custodian."

The Plaintiff alleges that "no recitation of sources consulted, or attempts made, to effect production of the return exists. Defendants responses specifically state (1) Rock City Heavy Hauls are not being provided because they have not been filed (2) Defendant Duncan Jr., cannot provide the requested documents because they are being held by Yarborough Certified Public Accountants and they were refusing to release them. This information complies with the "standard instruction" demanded by Plaintiff: statement of inability to obtain, the present location and identity of its present custodian (Yarborough, CPA).

The Defendants has not failed to permit inspection of the tax returns, rather they do not have the ability to produce documents that have not been filed. The Defendant's object to this Court requiring Defendant produce his raw financial data as this would essentially allow the Plaintiff to obtain information regarding the business that is irrelevant to this case or the Plaintiff. The Defendants have produced all their records relating to the payment of wages to the Plaintiff as well as all records relating to the payment of the trailer in dispute.

In the event the dispute between the Defendant and the CPA is resolved, the Defendant understands that he has an immediate obligation to provide the Plaintiff with the requested

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returns.

Respectfully submitted,

s/Stephen D. Schusterman
Stephen D. Schusterman
SCHUSTERMAN LAW FIRM, PA
PO Box 4211
Rock Hill, SC 29732
Telephone: 803-325-7788
Facsimile: 803-325-7889

February 28, 2019

ELECTRONICALLY FILED - 2019 Feb 28 9:50 AM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA	]	IN THE COURT OF COMMON PLEAS
	]	
COUNTY OF YORK	]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,	]	
	]	
Plaintiff,	]	ORDER ON DISCOVERY
v.	]	
	]	
ROBERT WAYNE DUNCAN, Jr.,	]	
ROBERT DUNCAN, Sr., and	]	C.A. No. 2017-CP-46-02487
FRANK EASON, d/b/a	]	
"Rock City Heavy Hauling, Inc.",	]	
	]	
Defendants.	]	
	]	

The Plaintiff's Motion to Compel Discovery came on for hearing at 4:00 P.M. on February 28th, 2019. John Martin Foster appeared for the Plaintiff, who was also present. Stephen D. Schusterman appeared for the Defendants.

By his Request for Production dated June 7, 2018, the Plaintiff requested the production of:

> 12. The personal and business, State and Federal, Income Tax Returns of any of the Responding Parties and/or "Rock Hill Heavy Hauling, Inc." for the years 2016 and 2017.

By in their response to the Request above, dated August 10, 2018, the Defendants stated:

> RESPONSE: Robert Duncan, Jr. - Tax returns have been prepared but they have not been released by Yarborough, Certified Public Accountant, therefore Duncan, Jr. does not have possession of them nor access to them.
> Rock City Heavy Haul, Inc, 2016/2017 tax returns not filed.
> Robert Duncan, Sr. 2016 Federal Return attached
> Eason, 2017 Federal Return attached

By e-mail dated November 30, 2018, counsel for Plaintiff made demand for a full response to Request for Production No. 12. No such response has been received.

No objection to the production requested has been made. No Motion for protection against such production has been filed. It is the general rule that in the absence of objection or protection, the documents requested must be produced. See, e.g., Beirnat v. Powell, 757 S.W.2d 115 (Tex.App. Houston (1st Dist.) (1988)).

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The Defendants demur on the basis that the said documents (or some of them) are not within their possession, being either in the hands of Yarborough, a North Carolina accountant, or the tax returns not having been filed. All parties acknowledge that "Rock City Heavy Haul, Inc." does not exist and cannot have produced any tax returns. Rule 34(a), S.C.R.C.P. requires that documents must be in the possession, custody or control of a party to be discoverable. The Defendants do not contest that the financial information needed to file the missing tax returns is within their possession, custody or control.

After argument, and by agreement of counsel as to the main points herein, this Court finds the following to be the equitable approach to this matter:

1. Any tax returns for Robert Duncan, Sr. from 2016 forward shall be supplied to the Plaintiff within ten (10) days after Counsel for Defendants' receipt of this Order;
2. Any tax returns for Frank Eason from 2016 forward shall be supplied to the Plaintiff within ten (10) days after Counsel for Defendants' receipt of this Order;
3. The Defendants shall, within ten (10) days after Counsel for Defendants' receipt of this Order, make a good faith effort to retrieve the financial data for any party from the North Carolina accountant;
4. Upon making such effort, the Defendants shall file with this Court, and deliver to Counsel for Plaintiff, proof that such effort has been timely made and the nature of that effort;
5. The Plaintiff shall designate an independent accountant and dis close the same to the Court and opposing Counsel;
6. That Defendants shall, within ten (10) days after request, deliver to the said accountant all data and documents, in Defendant's possession, custody or control, necessary to formulate tax return information for any years from 2016 forward in which returns have not been filed;
7. In default of such timely delivery, the Defendants shall file with this Court, and deliver to Counsel for Plaintiff, a statement of why such delivery has not been timely made;
8. That accountant is authorized, after analysis of the said data, to report his conclusions to the Plaintiff;
9. All information discovered pursuant to this Order shall not be used or disclosed by the parties or counsel for the parties or any other persons for any purposes whatsoever other than preparing for and conducting the litigation in which the documents were disclosed

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(including any appeal of that litigation); and

10. The Plaintiff's claim for reasonable expenses, including attorney's fees, is held in abeyance.

AND IT IS SO ORDERED.

Teasa Kay Weaver
Master in Equity for York County
E-Signature Page to Follow

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York Common Pleas

Case Caption: Mark Giles Pafford VS Robert Wayne Duncan Jr

Case Number: 2017CP4602487

Type: Order/Discovery and Disclosure of Evidence

So Ordered

s/ Teasa K. Weaver 3084

Electronically signed on 2019-03-20 17:27:00 page 4 of 4

STATE OF SOUTH CAROLINA COUNTY OF YORK	]]	IN THE COURT OF COMMON PLEAS SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD, Plaintiff, v. ROBERT WAYNE DUNCAN, Jr., Defendant.	]]]]]]]]]	NOTICE AND MOTION *IN LIMINE* Pursuant to: RULE 43, S.C.R.C.P. C.A. No. 2017-CP-46-02487

To: Stephen D. Schusterman
Attorney for Defendant
P.O. Box 4211
Rock Hill, South Carolina29731
803 325-7788
sdslaw@comporium.net

You or your attorney should appear before this Court to present evidence or argument, if any you have, relating to the Motion herein, as follows:

DATE AND TIME: To be set by the Clerk of Court,
or as soon thereafter as counsel may be heard.

PLACE: The Equity Court
York County Historic Courthouse
Courtroom 2
2 South Congress Street
York, South Carolina29730,
or such other place as may be designated by the Judge or the Clerk of Court.

Pursuant to Rule 43, S.C.R.C.P., the Plaintiff, by and through his attorney undersigned, moves this Court for an Order In *Limine* as indicated hereinbelow.

Pursuant to Rule 11(a), S.C.R.C.P., counsel for the Movant is under no duty, prior to filing this Motion, to consult with opposing Counsel or to attempt in good faith to resolve the matter contained in this Motion. Counsel for the Movant further certifies that such consultation would serve no useful purpose, as defined by the said Rule.

The Movant herein argues and would show that:

i. The matter discussed in the following paragraphs is incompetent, irrelevant and/or prejudicial to any of the material issues in this civil action;

ii. The injection of such matter into the trial of this civil action by any party, attorney or witness would cause irreparable harm to the Movant's cause; and

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iii. Should any of these matters be brought to the attention of the trier of fact, directly or indirectly, the Movant may be compelled to file a Motion for mistrial.

Therefore, in an effort to avoid to avoid possible prejudice and a possible mistrial in this civil action, the Movant moves this Court *in limine*:

A. To instruct all attorneys in the said action, and

B. To order all attorneys in turn to instruct all witnesses they place on the stand:

i. Not to interrogate about, mention, argue, make any reference, or draw the attention or notice of the trier of fact, to any of the below-referenced matters of fact within the hearing of the trier of fact, absolutely, whether opening or closing arguments, interrogation or witnesses, argument or objections before the jury or during any other phase or portion of the said trial, without first obtaining the express permission and authority of this Court to do so; and

ii. Not to read any pleading or any papers concerning such matter, or to utilize any other media which would publish or place such matter before the jury's notice, without such prior permission and authority; and

C. To instruct all attorneys that because violation of any or all of such Order would cause great harm to the Movant's cause and would deprive the Movant of a fair and impartial trial, failure to abide by such Order of this Court may constitute contempt of court.

Matter to be Limited

The Movant seeks the protection of an in limine order as to the following matter:

1. The personal habits of the witnesses for Movant, including Movant herself;

2. That the Movant has called or failed to call any particular witness during the trial of this civil action, unless and until a proper showing of admissibility of the same has been made for such reference;

3. That any document, communication. or the existence, substance, or contents thereof, which document or communication has not been timely produced in response to the discovery of Movant, or listed on the responses to discovery by Movant, exists or has any relevance to this action;

For the purposes of this Motion, the following definitions apply:

A. The terms "document" or "documents" shall refer to all writings and recorded materials, of any kind, that are or have been in the possession, control or custody of the responding party or of which the responding party has knowledge, whether originals or copies. Such writings or recordings include but are not limited to:

advertisements, agreements, applications, appraisals, bank statements, bills of sale, books, bulletins, charts, circulars, computer print-outs or discs or tapes, computer programs, confirmations, contracts, correspondence, desk calendars, diagrams, diaries, documents, drawings or other visual materials, e-mails, file memoranda, files, forecasts, forms, graphs, intra-

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or inter-office memoranda, journals or other books of account, ledgers, letters, lists, logs, manuals, minutes, note-books, notes, opinions or reports of consultants, orders, pamphlets, papers, periodicals, photographs or microfilm, plans, promissory notes, records, reports and/or summaries of interviews or conversations, reports and/or summaries of investigations, reports, research material, rough drafts, statements or expressions of policy, statistical computations, studies, tax invoices, telegrams, transcripts, voice or phono-records, working papers,

and other data compilations from which information may be obtained, of all natures and kinds whether handwritten, typed, printed, mimeographed, xerographed, photocopied or other matter are written, printed or recorded. If any document(s) asked to be be produced, identified, attached or described is not in your possession or subject to your control, give the reason therefor and its present location and the identity of the present custodian of the document and of any copy of summary thereof.

B. "Communication" shall mean any or all transmittals of information, whether oral or reduced to writing, whether hand-written, type-written, tape-recorded, or produced by electronic data processing, irrespective of how conveyed (e.g.,telephone, telegraph, United States mail, foreign mail, private mail or courier service, facsimile or "fax" transmittal, face-to-face contact), including but not limited to: inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, notes, telegrams, advertisements, or other forms of verbal intercourse, whether oral or written.

The Movant requests that this Court grant:

A. This Motion in its entirety;

B. The protection and relief sought by appropriate Order binding on all attorneys, parties, witnesses and persons appearing in this civil action; and

C. Such other and further relief as this Court deems just and proper.

This Motion is based upon the Affidavit and other attachments hereto, on this Brief, and on the files, papers and pleadings in this civil action.

If the Opposing Party shall fail to appear, the Movant will request the relief prayed for in said Motion.

/s/_____

John Martin Foster
Attorney for Plaintiff
SC Bar No. 2086

223 East Main Street, Suite 520
Post Office Box 106
Rock Hill, SC 29731-6106

803 324-8100
803 324-8109: Fax
jmfoster@comporium.net

January 3, 2020

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2020 Jan 03 1:07 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA]	IN THE COURT OF COMMON PLEAS
]	
COUNTY OF YORK]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,]	
]	NOTICE and MOTION:
Plaintiff,]	
v.]	TO ALTER OR AMEND JUDGMENT
]	
ROBERT WAYNE DUNCAN, Jr.,]	Pursuant to RULE 59(a), S.C.R.C.P.
ROBERT DUNCAN, Sr., and]	
FRANK EASON,]	C.A. No. 2017-CP-46-02487
d/b/a Rock City Heavy Hauling, Inc.]	
]	
Defendants.]	
]	

To: Stephen D. Schusterman
Attorney for Defendants
P.O. Box 4211
Rock Hill, South Carolina29731
803 325-7788
sdslaw@comporium.net

You or your attorney should appear before this Court to present evidence or argument, if any you have, relating to the Motion herein, as follows:

DATE AND TIME: To be set by the Clerk of Court,
or as soon thereafter as counsel may be heard.

PLACE: The Equity Court
York County Courthouse
2 South Congress Street
York, South Carolina29730,
or such other place as may be designated by the Judge or the Clerk of Court.

Pursuant to Rule 59, S.C.R.C.P., the Plaintiff, by and through his attorney, moves this Court:

To reopen the Order dated May 4, 2020, amending the findings of fact and conclusions of law or making new findings and conclusions, and directing the entry of a new Order; and

For such other and further relief as this Court may deem just and proper.

ELECTRONICALLY FILED - 2020 May 15 9:03 AM - YORK - COMMON PLEAS - CASE#2017CP4602487

on the grounds that the Order of the Court is contrary to law and the evidence as proven at trial, on the following bases:

1. The Honorable Master enters her Findings as to the amounts paid and the allocations thereof between the Plaintiff's wages and payments on the Kenworth Truck, the 2009 TrailKing trailer and accessories. The Court notes that there are some $98,000.00 in payments to be attributed and concludes that it cannot find the intent behind such payments. This figure is not backed by the evidence.

2. The failure to attribute monies paid to a purpose is a misstatement of the Court's powers and duties. Given that the amount stated was paid, the Court is obliged to attribute such payments to some end, based upon such evidence as it has.

3. The Court concludes that proof of how the amounts paid is the Plaintiff's burden. The assignment of amounts paid is the Defendants burden to establish. In fact, no evidence on point was offered by the Defendants.

4. Allowing the reasoning adopted by the Court, the Plaintiff worked 120 weeks at $1,000.00 per week. This period of work was undisputed. Given this fact, the Plaintiff was owed at least $120,000.00 in wages by the Defendants.

5. The Court finds and concludes that the amount payable on the parties' contract of sale referenced above should be reduced to the value claimed by the Defendants. The Court is without power to amend the parties' contract, and any deficiency in the value of the goods covered thereby has been waived by the Defendants.

Pursuant to Rule 11(a), S.C.R.C.P., counsel for the Movant hereby affirms that this motion is dispositive in nature, and, to that end, requires no communication with opposing counsel, and, in the alternative, certifies that such consultation would serve no useful purpose or could not be timely held.

The basis for this Motion is the applicable law and rules of procedure, the above-cited

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Rules, the records of this civil action, and any Supporting Memorandum which the Plaintiff may submit herein.

/s/ John Martin Foster
Attorney for the Plaintiff
SC Bar No. 2086

The Guardian Building
223 East Main Street, Suite 520
Rock Hill, South Carolina29730

Post Office Box 106
Rock Hill, South Carolina29731-6106

(803) 324-8100
(803) 324-8109: Fax
jmfoster@comporium.net

May 15, 2020

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2020 May 15 9:03 AM - YORK - COMMON PLEAS - CASE#2017CP4602487

SCHUSTERMAN LAW FIRM, P.A.
Attorney at Law
541 EAST MAIN STREET · POST OFFICE BOX 4211 · ROCK HILL, SOUTH CAROLINA 29732
TELEPHONE 803 325-7788 · FACSIMILE 803 325-7889

STEPHEN D. SCHUSTERMAN

ELECTRONICALLY FILED - 2020 May 26 1:56 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

December 8, 2015

Municipal Court of Tega Cay
15077 Molokai Drive
Tega Cay, South Carolina 29708

Re: City of Tega Cay v. Deborah Lynn Salman
Charge: DUI 1st
Ticket #: 52806 GN

Dear Judge:

I represent Ms. Salman in regards to the above referenced case. At this time, I am entering a plea of not guilty on behalf of my client and I am requesting a jury trial. Please notify my office of the date and time of the jury strike and trial.

I am also enclosing a Brady Motion, please forward any and all discovery to my office.

Thank you for your consideration in this matter. If you should have any further questions, please feel free to contact my office.

With kind regards, I am

Sincerely yours,

Stephen D. Schusterman

Enclosure
SDS/as
cc: Ms. Deborah Salman
Willy Thompson, Esq.

STATE OF SOUTH CAROLINA	]	IN THE MUNICIPAL COURT
COUNTY OF YORK	]	
State of South Carolina,	]	
Plaintiff,	]	Ticket #'s: 52806 GN
v.	]	
Deborah Lynn Salman,	]	
Defendant.	]	

MOTION FOR BRADY AND OTHER FAVORABLE MATERIAL AND

INCORPORATED MEMORANDUM OF LAW

COMES NOW, the Defendant by and through undersigned counsel and files this motion for Brady and other favorable material and incorporated Memorandum of Law requiring the production of material to the Defendant within thirty days of the receipt of this request or at least ten (10) days prior to trial. As grounds therefore, the undersigned would show as follows:

1. Under the United States Supreme Court decision Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194 (1963), the Solicitor has an obligation to produce all Brady material for the Defendant well in advance of the scheduled trial date.

2. Defendant claims under Brady and its progeny, as well as the language and spirit of Giglio v. United States, 405 U.S. 105, 92 S.Ct. 763 (1972); United States v. Tashman, 478 F.2d 129 (5th Cir. 1973); and Napue v. Illinois, 360 U.S. 264, 79 S.Ct. 1173 (1959); Alconta v. Texas, 355 U.S. 28 (1957); Mooney v. Halliham, 294 U.S. 103 (1935); and Moore v. Illinois, 408 U.S. 786 (1962); that he is entitled to any and all reports, memoranda and documents, as well as a statement of the Circuit Solicitor and all appropriate state, federal and local law agencies as to:

a. All statements by the Defendant, whether oral or written; if written whether signed or unsigned.

b. All handwritten notes made by police or other investigating officers of their interview or conversations with the Defendant or any other witness.

c. Any oral, written or recorded statements made by any person to the Solicitor's office, Grand Jury or any law enforcement agency in connection with this case.

d. A copy of all tape recordings, audio or visual, made by the Defendant, a witness or any other person in connection with this case. If these tape recordings have

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been transcribed, then a copy of the transcribed conversation is also requested.

3. Any and all investigation reports, information or material which tends to establish the Defendant's innocence, to mitigate punishment or to impeach, discredit or contradict the testimony of any witness whom the State will or may call at trial. Giles v. Maryland, 386 U.S. 66, 87 S.Ct. 793 (1967); Napue v. Illinois, 360 U.S. 264, 79 S.Ct. 1173 (1959); Giglio v. United States, supra.

4. The names and addresses of al witnesses interviewed by the Solicitor's office or any other law enforcement agency who might establish the Defendant's innocence, mitigate punishment or to impeach, discredit or contradict the testimony of any witness of the State whether or not the witness may testify at trial.

5. Any and all photographs taken of the Defendant on any portion of his body.

6. Any and all photographs taken at the scene of the alleged crime and/or the alleged victim or prosecuting witness.

7. Any photographs that have been exhibited to any person for the purpose of establishing the identity of the perpetrator of the crime charged and the name and current address of the person or persons to whom the photographs were shown.

8. Any scientific or medical report which tends to establish the Defendant's innocence, to mitigate punishment or to impeach, discredit or contradict the testimony of any witness whom the State will or may call at trial. Ashley v. Texas, 319 F.2d 80 (5th Cir.), Cert. denied, 375 U.S. 931, 84 S.Ct. 331 (1963). This request shall include any reports by or to the State Law Enforcement Division (SLED) criminalistic laboratory, Federal Bureau of Investigation Laboratories, County Sheriff's Department laboratory or any other law enforcement laboratory concerning an examination made by said laboratories and/or personnel thereof, of any physical, photographic, oral or written evidence concerning the investigation of this case.

9. All reports from the State Law Enforcement Division (SLED), Sheriff's Department or any other law enforcement agency, including Federal Bureau of Investigation, concerning fingerprints checked in connection with this case.

10. All records of arrests or criminal convictions of the Defendant or any co-defendant and all State's witnesses in relation to this case. Giglio v. United States, supra.

11. All "inconsistent" statements made by a particular witness or between witnesses, whether written or oral, that is known to the Solicitor's office or any other law enforcement agency.

12. Any statement or admission by a witness for or on behalf of the State with respect to the witness' memory or loss thereof.

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13. Whether or not any witness called before the Grand Jury or who has or will give testimony to any investigative agency or at trial has ever been psychiatrically hospitalized or undergone psychiatric treatment, examination, mental status examination or care, and if so, a list of names and addresses of the psychiatrists, hospitals and copes of any and all relevant records and reports.

14. All notes or memorandum by psychiatrists or other medical or mental health examiners of their conversations with the defendant.

15. Any and all plea bargains, promises, rewards, reductions, dismissals, agreements not to bring criminal charges or any other inducements made to any witness herein, whether or not they have testified before any State of Federal Grand Jury or other investigative agency and regardless of whether or not they will testify at trial.

16. Any offers or grants of immunity to any witness from loss of property, fine, forfeiture, prosecution or punishment in this case or any other case, related or otherwise.

17. In addition, Defendant requests copies of any and all memoranda, reports and correspondence to and from the various law enforcement agencies of the United States and all state, county, municipal and local law enforcement agencies regarding the investigation herein.

18. Any and all physical or tangible items in the possession, custody or control of or which could be brought with the possession, custody or control of the Solicitor's Office, State, Federal or local law enforcement agency.

19. Defendant contends that this Court should specifically direct the Government in the spirit of fairness and equity, seek and produce for the defendant the documents, letters, records and other items sought, irrespective of the State's determination of whether a witness' statement or a particular letter or exhibit can "help" the defendant. The Defendant and his attorney, not the Solicitor, should be the judge of his defense and the documents relevant thereto and necessary in support of same.

20. To the extent the defendant is specifically required to demonstrate the materiality of the requested information, the defendant submits this requirement is satisfied in this motion. United States v. Agurs, 427 W.S. 97 (1976).

21. Recognizing that Brady v. Maryland, supra, and other authorities cited require that information favorable to the defendant be made available, and further recognizing that a genuine disagreement may arise as to whether or not a particular item of evidence is favorable, it will be requested that the Court provide for and in camera inspection of the items sought to be discovered should you feel such items are not favorable to the defendant. By permitting the Court to examine the items requested, the legitimate interest of the State will be protected in that no disclosure in excess of Brady, et al, will occur. Further, it will be requested of the Court that said Order will be a continuing one, and if,

ELECTRONICALLY FILED - 2020 May 26 1:56 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

prior to or during trial, the prosecution is hereby requested promptly to notify counsel for the defendant of the existence of the additional evidence or material.

22. With regard to any road block that may have existed in this case please provide the following:

a) Any and all documents, paperwork, or documentation concerning the establishment of the roadblock.

b) A list of rues and regulations followed in establishing and administering the roadblock.

c) Any documentation establishing that your agency complied with the requirements of the Fourth Amendment of the United States Constitution.

d) A complete list of the manes of persons involved in the establishment and administration of the roadblock.

e) If A sobriety checkpoint advisory committee was established or exists please list their names.

f) Produce any documentation or activity of the advisory committee in establishing this roadblock.

g) Set forth all procedures established in governing this checkpoint operation.

h) Set forth the facts in determining the site location for this checkpoint and any publicity regarding it which was delivered to the public.

i) State whether or not every vehicle coming to the checkpoint was either required to be stopped or was in fact stopped during the time of the checkpoint.

j) State the specific times of this checkpoint.

k) State specifically what command or supervisory participation existed for the officers in the field at the checkpoint.

l) State specifically what demonstration of need or efficacy existed at the particular time and place of this checkpoint.

m) State specifically why, when, and where and by whom this checkpoint was to be set up.

n) State specifically the number of arrests made at this checkpoint and the number of drivers stopped.

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o) State specifically whether or not the roadblock was set up to detect and apprehend drunk drivers.

p) State specifically the purpose of the checkpoint, the policy established by the department for the checkpoint, the department's guidelines and procedures for the checkpoint, and the procedures actually followed by the department during this checkpoint.

It is further requested that the prosecution promptly respond to the within request by notifying counsel for the defendant of the existence and availability of the information requested herein with thirty days of the receipt of this motion and at least ten days prior to trial.

Stephen D. Schusterman
SCHUSTERMAN LAW FIRM, P.A.
541 East Main Street
Post Office Box 4211
Rock Hill, South Carolina 29732
ATTORNEY FOR THE DEFENDANT
(803) 325-7788

Rock Hill, South Carolina

December 8, 2015.

ELECTRONICALLY FILED - 2020 May 26 1:56 PM - YORK - COMMON PLEAS - CASE#2017CP4602487

STATE OF SOUTH CAROLINA]	IN THE COURT OF COMMON PLEAS
]	
COUNTY OF YORK]	SIXTEENTH JUDICIAL CIRCUIT
MARK GILES PAFFORD,]	
]	
Plaintiff,]	MEMORANDUM ON
v.]	
]	RULE 59 MOTION
ROBERT WAYNE DUNCAN, Jr.,]	
ROBERT DUNCAN, Sr., and]	C.A. No. 2017-CP-46-02487
FRANK EASON, d/b/a]	
"Rock City Heavy Hauling, Inc.",]	
]	
Defendants.]	
]	

ELECTRONICALLY FILED - 2020 Jun 17 9:49 AM - YORK - COMMON PLEAS - CASE#2017CP4602487

BACKGROUND: TRUCK SALE

The agreement of the parties was the sale of a used 2003 Kenworth W 3900 red truck, VIN # 1XKWDB9X03J392961, a 1998 TrailKing trailer and a 2009 Trailking trailer by the Plaintiff to the Defendants DUNCAN. The Plaintiff also testified that the agreement included a joe-dog and an extra axle. (This transaction is referred to herein as "the truck sale".)

PAFFORD testified that the agreed price was $95,000.00 for the truck sale; this is confirmed by the Defendants' handwritten notes entered as their Exhibit 1.

CLAIMS OF FRAUD/NEGLIGENT MISREPRESENTATION

The Defendants allege fraud and misrepresentation as to the 2009 Trailer. The evidence proffered by Defendants on these claims was statements allegedly made to a witness and a printout from a third party website: this evidence is inadmissible to prove the DUNCANS' claim of fraud or negligent misrepresentation.

The Defendants' assertion of lack of title was not proven by any sworn statement by a person with knowledge or by any certified title document. PAFFORD retained title to the property to be sold, or had control of such title, as shown by the Certificates of Title entered as Plaintiff's Exhibit 4, including that of the 2009 Trailer. Under South Carolina law, a Certificate of Title is *prima facie* evidence of ownership.

Subject: Lender Conference Call
From: "david fisherenterprisesllc.com" <david@fisherenterprisesllc.com>
Date: 3/29/21, 12:08 PM
To: Jerry Hartley <jerryhartleyfuneralhome@gmail.com>, John Martin Foster <jmfoster@comporium.net>, "Reid B. Smith" <rsmith@birdsmithlaw.com>
CC: Rob Wilson <rob@rjwcpa.com>, "pnewman@adviscocapital.com" <pnewman@adviscocapital.com>

Thank you Jerry.

We are CONFIRMED for **430 PM today** for the call.

The call in number is **712-775-7100 PIN 56045#.**

Speak to all then.

Best Regards,

SPYTEC

STI_GL300

IMEI:860599002348340

FCC ID:YQD--GL300

CE 0678

Internal Battery: 1300mAh , 3.7V

Input Voltage: DC 4.75 - 5.25V

Designed By Quectlink

Warning!!

Made in China

May explode if disposed of in fire

Don't Expose to Temperature above 60°C/140°F

SPYTEC

STI_GL300

IMEI:860599002347847

FCC ID:YQD--GL300

CE 0678

Internal Battery: 1300mAh , 3.7V

Input Voltage: DC 4.75 - 5.25V

Designed By Quectlink

Warning!!

Made in China

May explode if disposed of in fire

Don't Expose to Temperature above 60°C/140°F

EXHIBIT

1-7-20

PL

denied

DRIVER'S DAILY LOG

(24 HOURS)

6 / 25 / 15
(Month) (Day) (Year)

Original - File at home terminal
Duplicate - Driver retains in his/her possession for eight days

RECAP Complete at end of workday.

Total Miles Driving Today: 800 275

Total Mileage Today:

Name of Carrier or Carriers: AMERICAN HEAVY

Main Office Address: 1524 N ANDERSON RD

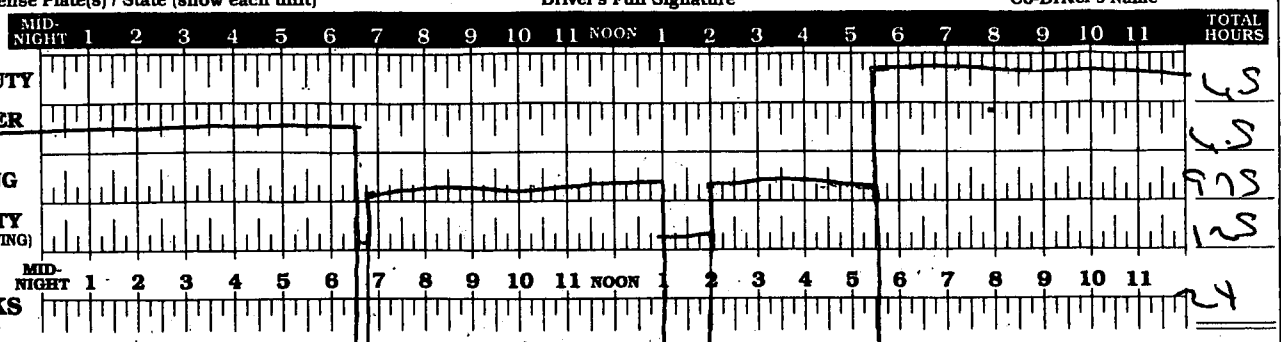
Home Terminal Address:

Truck/Tractor and Trailer Numbers or License Plate(s) / State (show each unit):

I certify these entries are true and correct:

Driver's Full Signature: MOL

Co-Driver's Name:



On-duty hours today. (Total lines 3 & 4)

70 Hour/ 8 Day Drivers

A. Total hours on duty last 7 days, including today.

B. Total hours available tomorrow. 70 hr. minus A.*

C. Total hours on duty last 8 days, including today.

60 Hour/ 7 Day Drivers

A. Total hours on duty last 6 days, including today.

B. Total hours available tomorrow. 60 hr. minus A.*

C. Total hours on duty last 7 days, including today.

*If you took 34 consecutive hours off duty, you have 60/70 hours available again.

SHIPPING DOCUMENTS:

B/L or Manifest No.
or
Shipper & Commodity

Enter name of place you reported and where released from work and when and where each change of duty occurred.

From: Left Dickinson To: Rock Hill

USE TIME STANDARD AT HOME TERMINAL

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DRIVER'S VEHICLE INSPECTION REPORT

CARRIER'S NAME: AMERICAN

CARRIER'S ADDRESS: SAME

TRACTOR/TRUCK NO.: T 5

TRAILER(S) NO.(S): T 114

TRACTOR/TRUCK	DRIVER'S REPORT	MECHANIC'S REPORT	TRACTOR/TRUCK	DRIVER'S REPORT	MECHANIC'S REPORT	TRACTOR/TRUCK	DRIVER'S REPORT	MECHANIC'S REPORT	TRAILER(S)	DRIVER'S REPORT	MECHANIC'S REPORT
Brake Lines to Trailer	✓		Frame & Assembly	✓		Transmission	✓		Brakes	✓	
Electric Lines to Trailer	✓		Head Lights	✓		Rear Vision Mirror	✓		Brake Connections	✓	
Drive Line	✓		Tail Lights	✓		Steering			Coupling Devices	✓	
Coupling Devices			Stop & Turn Lights			Service Brakes			Coupling (King) Pin		
Tires, Wheels, Rims			Clearance & Marker Lights			Speedometer			Doors		
Suspension System			Reflectors			Other Items			Hitch		
Body			Air Pressure Warning Device						Landing Gear		
Glass			Oil Pressure			**EMERGENCY EQUIPMENT**			Lights – All		
Fuel System			Ammeter			Reflective Triangles	✓		Roof		
Cooling System			Horn			Fire Extinguisher			Suspension System		
Engine			Windshield Wipers			Flags, Fusees, Reflectors			Tarpaulin		
Leaks			Parking Brakes			Spare Bulbs, Fuses			Tires		
Exhaust			Clutch			Tire Chains			Wheels – Rims		
									Other Items		

☐ CONDITION OF THE ABOVE VEHICLE IS SATISFACTORY

DRIVER USE ✓ FOR ANY DEFECTIVE ITEM — MECHANIC USE ✓ WHEN CORRECTED AND YOUR INITIALS

DRIVER _____ DATE _____

ODOMETER END OF DAY _____
ODOMETER START OF DAY _____
TOTAL MILES DRIVEN TODAY _____
NEXT LUBRICATION DUE AT _____ MILEAGE

☐ ABOVE DEFECTS CORRECTED
☐ ABOVE DEFECTS NEED NOT BE CORRECTED FOR SAFE OPERATION OF VEHICLE

MECHANIC'S SIGNATURE:

DRIVER'S SIGNATURE: MOL

DATE: 6 25 15

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605-FS-C2 (Rev. 7/07) 8549

Rate and Load Confirmation

Rock City Heavy Haul INC
154 N Anderson Rd
Rock Hill, SC 29730
Tel: 803-324-4125 Fax:

LOAD #	202422
Page	1 of 1
Today's Date	08/30/2016
Ship Date	08/31/2016
Dispatcher	Brandy
Email	brandy@rockcityheavyhaul.com
Telephone	803-324-4125 x4159
Fax	

Driver	Telephone #	Email	Equipment	Truck #	Trailer #	Load Status
			Double Drop			Open

Shipper 1

SUNBELT TRACTOR 18555 STATE HWY 6 S. College Station, TX, 77845 Tel: 979-690-0693	Ship/Date:	08/31/2016	P/O #:
	Time:	12:00 AM	
	Type:	TL	Description: CAT 583T PIPELAYER 20L X 11.11W X 11.11H
	Quantity:	1	
	Weight:	84000	Major Intersection:
	Ship/Hrs:		
Appt: No	Shipping Notes: ... SERIAL NUMBER KSD298		

Consignee 1

TROY CONSTRUCTION 2235 CITY FARM RD Moultrie, GA, 31788 Tel: 713-703-0757	Del/Date:	12/01/2016	P/O #:
	Time:	12:00 AM	
	Type:	TL	Description: CAT 583T PIPELAYER 20L X 11.11W X 11.11H
	Quantity:	1	
	Weight:	84000	Major Intersection:
	Rec/Hrs:		
Appt: No	Consignee Notes: ...		

DISPATCH NOTES:

Powered by www.itsdispatch.com

Rate and Load Confirmation

Rock City Heavy Haul INC
154 N Anderson rd
Rock Hill, SC 29730
Tel: 803-324-4125 Fax:

LOAD #	202417
Page	1 of 1
Today's Date	08/26/2016
Ship Date	08/24/2016
Dispatcher	Brandy
Email	brandy@rockcityheavyhaul.com
Telephone	803-324-4125 x4159
Fax	

Driver	Telephone #	Email	Equipment	Truck #	Trailer #	Load Status
			Double Drop			Open

Consignee 1 Deliver

WAUKESHA FEARCE/ HOUSTON Rd 12320 SOUTH POST OAK Houston, TX, 77045 Tel: 000-000-0000 713 723 1050	Del/Date:	08/23/2016	P/O #:
	Time:	12:00 AM	
	Type:	TL	Description: komatsu pc490lc 11 39.4 x 11.11 x 11.11
	Quantity:	1	
	Weight:	108000	Major Intersection:
	Rec/Hrs:		
Appt: No	Consignee Notes: ...		

1124e

Shipper 1 Pick-up

KOMATSU AMERICA 409 SIGNAL MT ROAD Chattanooga, TN, 37415 Tel: 000-000-0000	Ship/Date:	08/24/2016	P/O #: ~~PO-WP11E3137 STOCK#2088913 SERIAL#A41480~~
	Time:	07:00 AM	
	Type:	TL	Description: komatsu pc490lc 11 39.4 x 11.11 x 11.11
	Quantity:	1	
	Weight:	108000	Major Intersection:
	Ship/Hrs:		
Appt: No	Shipping Notes: ... ED STORK 423-755-9600.		

DISPATCH NOTES:

Stock # 209 0404
Serial # A41490
PO# WP 11 E3138

Powered by www.itsdispatch.com

295/75 22.5

DRIVER'S DAILY LOG

(24 HOURS)

6 / 24 / 15
(Month) (Day) (Year)

Original - File at home terminal
Duplicate - Driver retains in his/her possession for eight days

American Heavy Haul
Name of Carrier or Carriers

154 N Anderson Rd Rock Hill SC
Main Office Address

Total Miles Driving Today | Total Mileage Today

Home Terminal Address

I certify these entries are true and correct:

Truck/Tractor and Trailer Numbers or License Plate(s) / State (show each unit)

Driver's Full Signature | Co-Driver's Name

	Total Hours
1. OFF DUTY	11.25
2. SLEEPER BERTH	2
3. DRIVING	8.25
4. ON DUTY (NOT DRIVING)	2.50
	24

REMARKS

Rock Hill
PTS
Albany GA
Loaded
Lowes C 49
Idel
In A talk with Robbie: Andy I'll Start Making 150,000 Weekly Next Week
Load In-Gut 49?
Dublin GA

SHIPPING DOCUMENTS:

B/L or Manifest No.
or
Shipper & Commodity

Enter name of place you reported and where released from work and when and where each change of duty occurred.

From: Rock Hill SC To: Lowes Dublin GA.

USE TIME STANDARD AT HOME TERMINAL

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RECAP
Complete at end of workday.

On-duty hours today. (Total lines 3 & 4)

70 Hour/ 8 Day Drivers

A. Total hours on duty last 7 days, including today.

B. Total hours available tomorrow. 70 hr. minus A.*

C. Total hours on duty last 8 days, including today.

60 Hour/ 7 Day Drivers

A. Total hours on duty last 6 days, including today.

B. Total hours available tomorrow. 60 hr. minus A.*

C. Total hours on duty last 7 days, including today.

*If you took 34 consecutive hours off duty, you have 60/70 hours available again.

DRIVER'S VEHICLE INSPECTION REPORT

CARRIER'S NAME: American

CARRIER'S ADDRESS: Same

TRACTOR/TRUCK NO.: T 52 TRAILER(S) NO.(S): T 116

TRACTOR/TRUCK	DRIVER'S REPORT	MECHANIC'S REPORT	TRACTOR/TRUCK	DRIVER'S REPORT	MECHANIC'S REPORT	TRACTOR/TRUCK	DRIVER'S REPORT	MECHANIC'S REPORT	TRAILER(S)	DRIVER'S REPORT	MECHANIC'S REPORT
Brake Lines to Trailer	✓		Frame & Assembly	✓		Transmission	✓		Brakes	✓	
Electric Lines to Trailer	✓		Head Lights	✓		Rear Vision Mirror	✓		Brake Connections	✓	
Drive Line	✓		Tail Lights	✓		Steering			Coupling Devices	✓	
Coupling Devices			Stop & Turn Lights			Service Brakes			Coupling (King) Pin		
Tires, Wheels, Rims			Clearance & Marker Lights			Speedometer			Doors		
Suspension System			Reflectors			Other Items			Hitch		
Body			Air Pressure Warning Device						Landing Gear		
Glass			Oil Pressure			EMERGENCY EQUIPMENT			Lights – All		
Fuel System			Ammeter			Reflective Triangles	✓		Roof		
Cooling System			Horn			Fire Extinguisher			Suspension System		
Engine			Windshield Wipers			Flags, Fusees, Reflectors			Tarpaulin		
Leaks			Parking Brakes			Spare Bulbs, Fuses			Tires		
Exhaust			Clutch			Tire Chains			Wheels – Rims		
									Other Items		

☐ CONDITION OF THE ABOVE VEHICLE IS SATISFACTORY

DRIVER USE ✓ FOR ANY DEFECTIVE ITEM MECHANIC USE ✓ WHEN CORRE AND YOUR

DRIVER _____ DATE _____

ODOMETER END OF DAY _____
ODOMETER START OF DAY _____
TOTAL MILES DRIVEN TODAY _____
NEXT LUBRICATION DUE AT _____ MILEAGE

☐ ABOVE DEFECTS CORRECTED
☐ ABOVE DEFECTS NEED NOT BE CORRECTED FOR SAFE OPERATION OF VEHICLE

MECHANIC'S SIGNATURE:

DRIVER'S SIGNATURE:

DATE: 6 24

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