

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF GREENVILLE )  
 )  
RONALD SOLES, )  
 )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
IOAN GHERMAN d/b/a )  
USA AUTO TRANSPORT LLC and )  
JASON BROCKMAN d/b/a )  
JNJ TRANSPORT, LLC, )  
 )  
Defendants. )  
 )

IN THE COURT OF COMMON PLEAS  
THIRTEENTH JUDICIAL CIRCUIT

CASE No.: 2022-CP-23-05403

**MOTION TO SET SURETY UNDER  
SC CODE SECTION 18-9-150 AND  
STAY ENFORCEMENT OF THE  
ORDER**

**RECEIVED**  
**Mar 01 2023**  
**SC Court of Appeals**

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Defendant Brockman, by and through his Attorney Brian Smith, moves for the following relief  
Under SC Code Section 18-9-150.

The Court ordered an immediate transfer of the personal property at issue in this matter which would cause an immediate loss of the Defendant's filed mechanics lien which he is in process of perfecting. The Defendant moves that he be allowed to post a reasonable surety bond for the reasonable fair market value of the motor vehicle at issue in this matter. The time period for the Defendant would be thirty days from February 27, 2023 to March 23, 2023. Allowing Defendant Brockman to post a reasonable surety and stay enforcement will protect Defendant Brockman's mechanic lien during the time needed for the Defendant Brockman to file his appeal. The Order was filed today. To the extent that the judgement filed today and SC Court of Appeal Rule 241 and SC Code Section 18-9-150 requires a surety, Defendant Brockman is entitled to have a reasonable surety or have a neutral be appointed.

\*\*\*signature page follows\*\*\*

s/Brian T. Smith

Brian T. Smith, SC Bar #70232

*Attorney for Defendant*

**LAW OFFICE OF BRIAN T. SMITH**

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March 01, 2023

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