

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

May 15 2023

SC Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master In Equity

Case # 2020-CP-46-00549
Appellate Case # 2022-001650

LB PARK, LLC, Respondent,

v.

San Juan Holdings, Brett Osborne, the trustee; Brett Osborne as Trustee of San Juan Holdings; Ryan Powell; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as 25056 Timberlake Drive, York County, South Carolina, TMS 643-10-001-023, their heirs and assigns, and all other persons, firms, or corporations entitled to claim under, by or through the above named Defendant(s), and all other persons or entities unknown claiming any right, title, interest, estate in, or lien upon the real estate described as 25056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023, Defendants,

of whom Ryan Powell is the Appellant.

**Motion to Strike Respondent's Initial Brief
and Designation of Matter**

Comes now appellant, Ryan Powell ("Ryan"), who pursuant to Rule 240 SCACR and Rule 208(a)(2) SCACR moves this Court to Strike Respondent's Initial Brief and Designation of Matter that was filed and served after their filing deadline had expired.

Mandatory Judicial Notice

All judges on this Court are to take mandatory judicial notice under 201(d) SCRE of the following fact: Ryan has registered his deed on February 23, 2023 in the York County Register of Deeds office in book 20628, page 278 ("Registered Deed") thereby putting his property under the jurisdiction of this State and giving him the right to use the

courts of this State to protect and defend his property. A copy of Ryan's Registered Deed is attached as Exhibit A and is fully incorporated herein by reference.

**Conspiracy and Fraud On The Court Are The Reasons For
Respondent's Initial Brief Being Filed and Served Late**

Clerk of Court, Jenny Kitchings ("Clerk"), deputy clerk, V. Claire Allen ("Allen"), and Respondent's appeal attorney Sarah P. Spruill ("Spruill") have been colluding and conspiring ("The Conspirators") to manipulate both this appeal and Ryan's 2019 appeal case (#2019-000979) in order to get both appeals dismissed. The method The Conspirators have used to achieve that goal is to attempt to deceive Ryan into believing that the timelines for perfecting his two appeals are being held in abeyance so that he misses a filing deadline upon which Clerk, and her deputy clerks, would be authorized to dismiss Ryan's appeals.

One example of how this conspiracy has played out is evidenced by a letter Allen signed and mailed to the parties dated March 21st. A copy of Allen's March 21st letter is attached as Exhibit B and is fully incorporated herein by reference. Allen's letter states, *inter alia*, that the timelines for perfecting this appeal is being held in abeyance pending a ruling on Respondent's Motion to Consolidate. However, Respondent's Motion to Consolidate does not request such relief. See a copy of Respondent's Motion to Consolidate (without exhibits) attached as Exhibit C and fully incorporated herein by reference. Further, there is no order in the record granting any abeyance. See copy of on-line case docket showing no "Non-Dispositional Decision" granting an abeyance after Respondent's Motion to Consolidate was filed attached as Exhibit D and fully incorporated herein by reference.

The most recent example of how this conspiracy has played out happened on May 2, 2023, which is the day that Ryan filed and served his Final Brief. See copy of Ryan's Certificate of Service for his Final Brief attached as Exhibit E and fully incorporated herein by reference. That day, May 2nd, happened to be, **not coincidentally**, the same day that the order disposing of Respondent's Motion to Consolidate was filed. That order was probably sitting on Clerk's desk waiting to see if Ryan would fall for The Conspirator's fraud. When it became clear that Ryan was not falling for the fraud, Clerk filestamped and entered that order and then shortly thereafter signed and mailed a letter to the parties dated May 4, 2023. See copy of Clerk's May 4th letter attached as Exhibit F

and fully incorporated herein by reference. In that letter, Clerk gave Respondent ten (10) days to file their Initial Brief and Designation of Matter. It seems to have not mattered to Clerk that Ryan had timely served and filed his Final Brief just two days prior to her May 4th letter. However, to keep up the fraud, Clerk had to pretend that Ryan's Final Brief had not been served and filed even though it is clearly in the case record (See Exhibit D).

After Respondent filed its Initial Brief and Designation of Matter on May 12, 2023, if Ryan refuses to RE-create the Record on Appeal to include Respondent's untimely served and filed Designation of Matter, this appeal will be unlawfully dismissed. The goals of Clerk's May 4th letter appear to be the following: 1) create additional unnecessary delays of this appeal; 2) give Respondent an unauthorized advantage in this appeal; 3) give The Conspirator's more new opportunities to defraud Ryan so that they can dismiss this appeal; and 4) create additional costs and effort on Ryan for which he can never be compensated.

Time For Respondent To Serve And File Its Initial Brief Has Passed

According to Rule 208(a)(2) SCACR, Respondent's Initial Brief was due to be served within 30 days of Ryan's Initial Brief being served on Respondent. However, Respondent requested and was granted an extensions of time to file their Initial Brief and Designation of Matter. See copy of the last extension order which is attached as Exhibit G and fully incorporated herein by reference. According to Exhibit G, Respondent was required to serve its Initial Brief and Designation of Matter by April 24, 2023. There is no court order in the record extending the time for Respondent to serve its Initial Brief and Designation of Matter past April 24, 2023 (see docket, Exhibit D). See filestamped copy of Respondent's Certificate of Service for their Initial Brief and Designation of Matter attached as Exhibit H and fully incorporated herein by reference. Respondent's Initial Brief and Designation of Matter, served on May 12th, has been served after its filing deadline of April 24th expired and it must be stricken from the record.

Had Spruill timely served and filed Respondent's Initial Brief and Designation of Matter by the April 24th deadline, it would have been **impossible** to defraud Ryan into believing that the timelines for perfecting his appeal were being held in abeyance. In order to defraud Ryan, Spruill had no other choice but to miss Respondent's Initial Brief deadline.

Spruill signed a letter to Clerk on May 12, 2023 which she included with her filing of Respondent's Initial Brief and Designation of Matter that states in pertinent part - "*While the motion was pending, the clerk's office assured me that the matter was in fact held in abeyance¹ and no filings were due. For that reason, Respondent did not believe the time for filing its initial brief and designation had expired.*". An appeal attorney who has over 22 years of experience would NEVER need to consult with the clerk's office to determine her client's filing deadlines. If Spruill needed to do so then she is grossly incompetent and should be disbarred. But of course, Spruill is just pretending. The Conspirators have lied repeatedly about the timelines for perfecting this appeal being held in abeyance so they must continue to lie no matter how ludicrous their lies become. As the famous saying goes "*Oh, what a tangled web we weave...when first we practice to deceive.*". A copy of Spruill's filing letter is attached as Exhibit I and fully incorporated herein by reference.

Spruill cannot, and therefore will not, produce a copy of any court order showing that the timelines for perfecting this appeal were held in abeyance on April 24th when Respondent's Initial Brief and Designation of Matter were due. After Spruill fails to produce such a court order, this Court can not consider any of her false, specious, and frivolous arguments that she will be required to make in order to oppose this motion being granted.

Clerk's May 4th Letter Puts Ryan In A Catch-22 Situation

This appeal was perfected on May 2, 2023 when Ryan timely and correctly served and filed his Final Brief (see Exhibit E) after Respondent's initial brief and designation of matter service deadline expired (see Exhibit G). Nonetheless, Clerk and/or her deputy clerks will most likely dismiss this appeal if Ryan does not comply with their fraud on the court. In other words, if Ryan does not timely serve and file an amended Record on Appeal to include the matter that Respondent designated in its untimely served and filed Designation of Matter, Clerk and/or a deputy clerk will fraudulently dismiss this appeal which will tremendously damage Ryan. Since this motion will not be heard and decided before the "pretended" deadline for Ryan filing an unauthorized amended Record on

¹ The "clerk's office" should be renamed the "keeper of secret knowledge" as clearly The Conspirators are expecting this Court to believe that the "clerk's office" holds secret knowledge that only they can discern, probably by reading the tea leaves. This situation would be laughable if it wasn't so disgustingly corrupt.

Appeal, Ryan must request the timelines for perfecting **this already perfected appeal** be held in abeyance pending a decision on this motion so that his appeal is not fraudulently dismissed.

Conclusion

This Court must order the following relief:

1. Strike Respondent's Initial Brief and Designation of Matter from the case record;
2. Hold in abeyance all filing/service deadlines pending the Court's ruling on this motion; and
3. Any other relief this Court deems just and proper.

May 15, 2023

/s Ryan Powell

Ryan Powell, Appellant
287 East Hawfields
Pittsboro, NC 27312

recorded in Deed Book 3173 at page 343, in the Office of the Clerk of Court for York County.

The property is conveyed free and clear of all security interests, liens, claims and encumbrances from any entity or person whatsoever.

TOGETHER with all and singular the rights, members, hereditaments and appurtenances to the said premises belonging or in anywise incident or appertaining.

TO HAVE AND TO HOLD all and singular the premises before mentioned unto the said Grantee, his heirs and assigns forever.

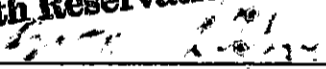
AND THE GRANTOR does hereby bind the Grantor, and the Grantors' heirs executors and administrators, to warrant and forever defend all and singular the said premises unto the said Grantee, his heirs and assigns, against the Grantor or the Grantors' heirs and against every person whomsoever lawfully claiming or to claim the same or any part thereof.

After filing for record mail to Grantee: Ryan Whitney
[not a residence address] c/o: 25056 Timberlake Drive
Tega Cay, South Carolina
Without the United States

WITNESS our Hand and Seal this the 20th day of December in the year of our Lord Two Thousand and Twelve and in the two-hundred and thirty-sixth year of the independence of the United States of America.

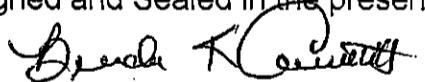
Grantor, SAN JUAN HOLDINGS:


By Brett Osborne Trustee (Seal)

Grantee:
With Reservation of All Rights


Ryan Whitney of the Powell family, a
free inhabitant, without the United
States (Seal)


Signed and Sealed in the presence of:



Witness #1 Signature

Brenda K. Callicutt

Witness #1 Printed Name



Witness #2 Signature

D. Aaron Simms

Witness #2 Printed Name

STATE OF SOUTH CAROLINA
COUNTY OF YORK

Personally appeared before me the undersigned witness and made oath that (s)he saw the within-name Grantor sign, seal and, as his act and deed, deliver the within written Deed to the within-name Grantee who then as his freewill act and deed did sign and seal the instrument and that (s)he, with the other witnesses subscribed above, witnessed the execution thereof.

SWORN to before me this
20th day of December, 2012

Brenda K. Cant
Witness #1

Joy M. Uter

Notary Public for State of South Carolina
My Commission Expires: ~~12/30/12~~ April 27, 2017

Joy M. Uter
NOTARY PUBLIC
State of South Carolina
My Commission Expires
April 27, 2017.

STATE OF NORTH CAROLINA)
COUNTY OF Durham)

Affidavit For Taxable Transfers

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this affidavit and I understand such information.
2. The property transferred bears York County Tax Map Number 643-10-01-023 and was transferred by San Juan Holdings, Brett Osborne, trustee to Ryan Whitney Powell on December 20, 2012.
- 3, The deed is subject to the deed recording fee as a transfer for consideration paid in money or money's worth.
- 4, The fee should be computed on the consideration I paid in money or money's worth which at the time the transfer was made was \$225,000.00.
5. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as the Grantee.
6. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

Ryan Powell
Ryan Powell

SWORN to and subscribed before me this
21 day of February, 2023

Ashley E. Amerson
Notary Public for North Carolina

My Commission Expires: 9-21-2027

<p>ASHLEY E. AMERSON Notary Public Wake Co., North Carolina My Commission Expires Sept. 21, 2027</p>



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

March 21, 2023

Ryan Powell
c/o 25056 Timberlake Drive
Fort Mill SC 29708

Re: LB Park, LLC v. San Juan Holdings (2)
Appellate Case No. 2022-001650

Dear Mr. Powell:

The Court has received your expedited motion to reduce or eliminate appeal bond. Upon review, the Court has declined to rule upon your motion pursuant to Rule 240(i), South Carolina Appellate Court Rules (SCACR). Furthermore, the Court has received a motion to consolidate and the timelines for perfecting the appeal will be held in abeyance pending a ruling on the motion.

Very truly yours,

A handwritten signature in blue ink that reads "V. Claire Allen".

CLERK

cc: A. Parker Barnes, III, Esquire
Sarah P. Spruill, Esquire

Mar 15 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Daniel Hall, Circuit Court Judge
Teasa K. Weaver, Master-in-Equity

Case No. 2019-CP-46-00310
Case No.: 2020-CP-46-00549

Ex Parte, Ryan Powell Appellant,
In re LB PARK, LLC Respondent,

v.

San Juan Holdings, Brett Osborne trustee, et al. Respondents.

LB PARK, LLC Respondent,

v.

San Juan Holdings, Bret Osborne, the trustee; Brett Osborne as Trustee of San Juan Holdings; Ryan Powell; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as 250056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023, their heirs and assigns, and all other persons, firms, or corporations entitled to claim under, by or through the abovenamed Defendant(s), and all other persons or entities unknown claiming any right, title, interest, estate in, or lien upon, the real estate described as 25056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023 Defendants.
of whom Ryan Powell is the Appellant.

MOTION TO CONSOLIDATE

Pursuant to Rule 214, SCACR, LB PARK, LLC (“LB Park”) moves to consolidate these appeals. These two appeals stem from two civil actions filed by LB Park to clear its tax title to a single parcel of property. The 2019 action was dismissed upon remand from this Court, and the appeal was held in abeyance pending a final order in the 2020 action. (10/15/2019 Order and 5/20/2020 Order attached as Exhibits 1 and 2). The final order in the 2020 action is now also on appeal. A comparison of the Statements of Issues on Appeal in the Appellant’s initial briefs in each of the above captioned appeals reveals that the same or similar questions are presented so as to warrant consolidation. (Statements of Issues attached as Exhibit 3). Given the above, judicial economy is served by consolidation.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Sarah. P. Spruill

Sarah P. Spruill (SC Bar No. 68337)

P.O. Box 2048 (29602)

Greenville, SC 29601

(864) 240-3200

sspruill@hsblawfirm.com

A. Parker Barnes III (SC Bar No. 68359)

P.O. Box 11889

Columbia, South Carolina 29211-1889

(803) 779-3080

pbarnes@hsblawfirm.com

Attorneys for Respondent LB PARK, LLC

March 15, 2023

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https://ctrack.sccourts.org/public/caseView.do?csIID=77492

- Party Information

Appellate Role	Party Name	Former	Attorney(s)
Appellant	Ryan Powell	N	Self Represented
Respondent	LB Park, LLC	N	A. Parker Barnes, III Sarah P. Sprull

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Event Information

Filed Date	Event Information	Doc
05/12/2023	Designation of Matter - Designation of Matter Filed	
05/12/2023	Initial Brief - Respondent	
05/05/2023	Correspondence - Incoming (Letter from Appellant Regarding May 4, 2023 Letter)	
05/04/2023	Correspondence - Outgoing (To Provide Initial Brief of Respondent)	
05/02/2023	Final Brief - Appellant	
05/02/2023	Non-Dispositional Decision - Order Denying Motion to Consolidate	
04/28/2023	Record - Record on Appeal Filed	
04/28/2023	Record - Proof of Service of Record on Appeal	
03/23/2023	Correspondence - Incoming (Filing Fee for Motion - Extension of Time (1st) Respondent's Initial Brief)	
03/21/2023	Correspondence - Outgoing (Court Declining to Rule on Order and To Hold in Abeyance)	
03/21/2023	Non-Dispositional Decision - Extension Granted	
03/20/2023	Motion - Extension of Time (1st) Respondent's Initial Brief	
03/16/2023	Motion - Return- to Motion to Consolidate	
03/15/2023	Motion - Consolidate	
03/09/2023	Motion - Return (Expedited Motion to Reduce or Eliminate Appeal Bond)	
03/07/2023	Motion - Expedited Motion to Reduce or Eliminate Appeal Bond	
03/07/2023	Non-Dispositional Decision - Withdrawn or Ended	
03/03/2023	Motion - Expedited Full Court Review of Single Judge's Denial of Supersedeas	
03/02/2023	Non-Dispositional Decision - Order Denying Rehearing (Supersedeas)	
02/27/2023	Rehearing - Reply (Supersedeas)	

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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master In Equity

Case No. 2020-CP-46-00549
Appellate Case # 2022-001650

LB PARK, LLC, Respondent,

v.

San Juan Holdings, Brett Osborne, the trustee; Brett Osborne as Trustee of San Juan Holdings; Ryan Powell; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as 25056 Timberlake Drive, York County, South Carolina, TMS 643-10-001-023, their heirs and assigns, and all other persons, firms, or corporations entitled to claim under, by or through the above named Defendant(s), and all other persons or entities unknown claiming any right, title, interest, estate in, or lien upon the real estate described as 25056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023, Defendants,

of whom Ryan Powell is the..... Appellant.

Certificate of Service For Appellant's Final Brief

I certify that I have served on Respondent Appellant's Final Brief and Rule 211 (b) SCACR Certification of Final Brief by and through their attorney of record by First Class Mail with proper postage affixed on the date below shown and addressed as follows:

Sarah P. Spruill
P.O. Box 2048 (29602)
Greenville, SC 29601

May 2, 2023

/s Ryan Powell
Ryan Powell, Appellant
c/o 25056 Timberlake Drive
Fort Mill, South Carolina



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
DEPUTY CLERK

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COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
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May 4, 2023

A. Parker Barnes, III, Esquire
P.O. Box 11889
Columbia, SC 29211

Sarah P. Spruill, Esquire
P.O. Box 2048
Greenville, SC 29602

Re: LB Park, LLC v. San Juan Holdings (2)
Appellate Case No. 2022-001650

Dear Counsel:

According to our records, the time to file the initial brief of respondent and designation of matter has expired. Within ten (10) days of the date of this letter you must serve and file the initial brief of respondent and designation of matter or the Court will proceed with its consideration of this appeal.

Very truly yours,

A handwritten signature in blue ink that reads "Jenny A. Kitchings".

CLERK

cc: Ryan Powell

The South Carolina Court of Appeals

LB PARK, LLC, Respondent,

v.

San Juan Holdings, Bret Osborne, the trustee; Brett Osborne as Trustee of San Juan Holdings; Ryan Powell; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, The real estate described as 250056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023, their heirs and assigns, and all other persons, firms, or corporations entitled to claim under, by or through the abovenamed Defendant(s), and all other persons or entities unknown claiming any right, title, interest, estate in, or lien upon, the real estate described as 25056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023, Defendants,

Of whom Ryan Powell is the Appellant.

Appellate Case No. 2022-001650

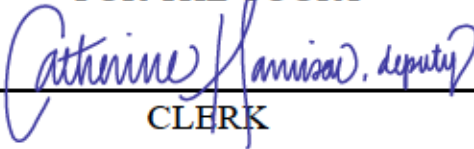
The Honorable Teasa Kay Weaver
York County
Trial Court Case No. 2020CP4600549

ORDER

The time for serving and filing the initial brief of respondent and designation of matter is hereby extended until April 24, 2023.

FOR THE COURT

BY


CLERK

Columbia, South Carolina

cc:

Ryan Powell

A. Parker Barnes, III, Esquire

Sarah P. Spruill, Esquire

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May 12 2023

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master-in-Equity

C.A. No.: 2020-CP-46-00549
Appellate Case No. 2022-001650

LB PARK, LLCRespondent,

v.


San Juan Holdings, Bret Osborne, the trustee; Brett Osborne as Trustee of San Juan Holdings; Ryan Powell; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as 250056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023, their heirs and assigns, and all other persons, firms, or corporations entitled to claim under, by or through the abovenamed Defendant(s), and all other persons or entities unknown claiming any right, title, interest, estate in, or lien upon, the real estate described as 25056 Timberlake Drive, York County, South Carolina, TMS 643-10-01-023 Defendants.

of whom Ryan Powell is theAppellant.

PROOF OF SERVICE

I certify that I have served *Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal* on all parties of record by depositing a copy of the same in the United States Mail, postage prepaid, on May 12, 2023, addressed to:

Ryan Powell
25056 Timberlake Drive
Fort Mill, SC 29708


Stacey Carberry, Legal Assistant
HAYNSWORTH SINKLER BOYD, P.A.
864.240.3223

**HAYNSWORTH
SINKLER BOYD**

HAYNSWORTH SINKLER BOYD, P.A.
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SARAH P. SPRUILL
DIRECT 864.240.3220
sspruill@hsblawfirm.com

May 12, 2023

VIA EMAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
May 12 2023
SC Court of Appeals

Re: *LB Park, LLC v. San Juan Holdings (2)*
Appellate Case No. 2022-001650

Dear Ms. Kitchings:

This firm represents the Respondent LB Park, LLC in the above matter. Enclosed for filing, please find *Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal* together with our Proof of Service for the same.

Respondent is happy to comply with the deadline set in the Court's letter of May 4, 2023. Just by way of explanation, this matter was held in abeyance pending a ruling on a motion to consolidate until May 2, 2023. While the motion was pending, the clerk's office assured me that the matter was in fact held in abeyance and no filings were due. For that reason, Respondent did not believe the time for filing its initial brief and designation had expired.

Please note service on counsel of record by copy of this letter. If you have any questions, please give me a call. Thank you for your assistance in this matter.

Sincerely,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/sac
Enclosures

cc: Ryan Powell
A. Parker Barnes, III (pbarnes@hsblawfirm.com)