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Jun 15 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
COURT OF COMMON PLEAS
EDGAR W DICKSON, CIRCUIT COURT JUDGE

Appellate Case No. 2022-001070

Rosen Hagood, LLC, ...Respondent/Appellant,

v.

Albert T. Henson, Jr., ...Appellant/Respondent,

RECORD ON APPEAL

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RESPONDENT ALBERT T. HENSON JR.

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ATTORNEY FOR RESPONDENT/APPELLANT
ROSEN HAGOOD, LLC

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Certificate of Counsel

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2020 CP-18-02003

Rosen Hagood, LLC
PLAINTIFF(S)

Albert T. Henson, Jr.
DEFENDANT(S)

Submitted by:

Attorney for : ☐ Plaintiff ☐ Defendant
or
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☒ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRPC; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

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

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

ORDER INFORMATION

This order ☒ ends ☐ does not end the case.
Additional Information for the Clerk : _____

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
Rosen Hagood, LLC	Albert T. Henson, Jr.	\$158,369.96
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. **Note: Title abstractors and researchers should refer to the official court order for judgment details.**

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____ to attorneys of record or to parties (when appearing pro se) as follows:

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter:

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

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

On June 2, 2022, this Court took under advisement Plaintiff's Motion for Summary Judgment. After consideration of the arguments of the parties presented at the hearing, along with careful review of the memoranda and exhibits submitted by the parties, the Court finds that no genuine issue of material fact exists and Plaintiff's motion is hereby GRANTED. However, in awarding judgment and reviewing the retainer agreement between Plaintiff and Defendant, marked as Exhibit A to Plaintiff's motion, this Court finds no reference to Defendant being responsible for interest accrued on unpaid fees. Accordingly, the Court denies Plaintiff's request for \$57,083.46 in accrued interest. Moreover, this Court finds that Plaintiff is not entitled to any attorney's fees or costs accrued after November 25, 2019, the date on which Judge Molly D. Edwards granted Rosen Hagood, LLC and Daniel F. Blanchard, III's motion to withdraw as counsel. According to Exhibit B of Plaintiff's motion, that would put Defendant's balance at \$158,369.96. For the foregoing reasons, Plaintiff's Motion for Summary Judgment is GRANTED and Plaintiff is entitled to \$158,369.96 in unpaid fees and expenses.

FORM 4C INSTRUCTIONS—JUDGMENT IN A CIVIL CASE
(Instructions for Information Only-Not to be filed with Form 4C)

1. Form 4C-Judgment in a Civil Case has been modified to add order information and enrollment instructions for the clerk of court. The purpose of Form 4 has not changed with the exception that judgment information is provided when applicable.
2. Please note that the Form 4C must be attached to all orders that include information to enroll in the judgment index. The clerk will not be responsible for reading the order to determine enrollment information.

The attorney or prevailing party will prepare and attach the Form 4C when submitting the proposed order that includes judgment enrollment information for the judgment index. The judge will review and sign Form 4C when he or she signs an order that includes judgment enrollment information for the judgment index.

3. Form 4C is not required to be submitted to the Court with orders that do not include information to enroll in the judgment index. If the clerk receives such an order without Form 4C attached, the clerk should enter and process the order pursuant to Rule 58 and Rule 77(d), SC Rules of Civil Procedure (i.e., the clerk should serve notice of entry of the judgment by mail or provide the attorneys with copies of the signed order by other means).
4. The “Information for the Judgment Index” section should be completed when the judgment affects title to real or personal property or if any amount should be enrolled. In the “Judgment in Favor of” column, enter the name of the party to whom the judgment is awarded. In the “Judgment Against” column, enter the name of the person to whom the judgment is against. The judgment amount to be enrolled should be noted in the “Judgment Amount” column. As necessary, describe any property referenced in the order if it is to be enrolled in the judgment index. If there is no judgment information to enroll, indicate “N/A” in one of the boxes in this section of the form.
5. To enter information to accommodate multiple parties, additional Form 4Cs may be used as necessary. Additional space may be inserted on the form as necessary.
6. The section “For the Clerk of Court Office Use Only” should be completed by the clerk as it has been with the previous version of Form 4.
7. If the matter is on appeal to the Circuit Court, then the parties on the form should be changed from Plaintiff and Defendant to Appellant and Respondent.
8. If an arbitrator prepares an order after arbitration, the arbitrator should strike through “Circuit Court Judge” and indicate “Arbitrator” in the signature block.

9. If a Special Circuit Court Judge, Master in Equity, or Special Referee prepares an order after hearing a Circuit Court matter, then he or she should strike through the title "Circuit Court Judge" below the signature line and indicate the appropriate title.
10. When an Order of Foreclosure is filed, neither the parties or debt owed should be listed in the Information for the Judgment Index Section, unless the foreclosure order specifically requires entry of the full judgment amount before the foreclosure sale, pursuant to Section 29-3-650 of the SC Code.
11. If the deficiency judgment is waived in a Foreclosure action, indicate N/A in the "Judgment Amount To Be Enrolled" box.
12. Foreclosure actions should be ended by the Clerk of Court upon receipt of the Order of Foreclosure. Subsequent information, including deficiency judgments, can be added to the action after the case is ended. The Master in Equity should end the action in the MIE system upon the receipt of the Order of Foreclosure.
13. When judgment enrollment information is included in the Information for the Judgment Index Section (for example, when there is a deficiency judgment), only the parties who the judgment is for and against should be included in the Section. Subordinate parties and lienholders should not be included in the box if there is not a judgment amount specifically for or against them.
14. Form 4C is not required to be attached to Transcripts of Judgment and Confession of Judgment.



Dorchester Common Pleas

Case Caption: Rosen Hagood Llc VS Albert T Henson Jr

Case Number: 2020CP1802003

Type: Order/Form 4

So Ordered

s/ Edgar W. Dickson #2153

Electronically signed on 2022-06-30 14:27:25 page 5 of 5

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	SUMMONS
	)	(Contract)
vs.	)	(Non-jury)
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
_____	)	

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED AND REQUIRED to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to the said Complaint on the Plaintiff or its counsel, F. Truett Nettles, II, Esquire, in the offices of Rosen Hagood, LLC at the offices at 151 Meeting Street, Suite 400, Charleston, South Carolina, 29401, or at Post Office Box 893, Charleston, South Carolina, 29402, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint in this action within the time aforesaid, the Plaintiff will apply to the Court for Judgment by default for the relief demanded in the Complaint.

s/ F. Truett Nettles, II
F. Truett Nettles, II, Esq.
Rosen Hagood, LLC
151 Meeting Street, Suite 400 (29401)
P.O. Box 893
Charleston, SC 29402
(843) 577-6726
tnettles@rosenhagood.com

December 16, 2020
Charleston, South Carolina

Attorney for the Plaintiff

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	COMPLAINT
	)	(Contract)
vs.	)	(Non-jury)
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
_____	)	

The Plaintiff would allege and show unto this Honorable Court that:

1. The Plaintiff is a law firm organized and existing as a limited liability company under the laws of the State of South Carolina and has its principal office located in the County of Charleston, State of South Carolina.

2. The Defendant is, upon information and belief, a citizen and resident of the County of Dorchester, State of South Carolina.

FIRST CAUSE OF ACTION
(Breach of Contract)

3. By written representation agreement dated May 25, 2016, the Defendant retained the professional services of the Plaintiff law firm to represent him in certain litigation pending in the Dorchester County Probate Court concerning a Trust created by the Defendant's grandmother and, in particular, the disposition of Trust real property located at 605 North Main Street, Summerville, South Carolina and the Defendant's proper share and participation in the benefits of that Trust which might result from the sale of that real property.

4. Beginning in May 2016 and continuing through December 2019, the Defendant received the benefit of legal representation and services from the Plaintiff.

5. On page three of the Representation Agreement, the parties agreed that the Defendant would receive monthly statements for legal services rendered and payment thereof was due upon receipt.

6. During the first two years of representation, the Defendant made significant payments to the Plaintiff for legal services rendered.

7. During the years 2018 and 2019, the Defendant did not pay for mounting legal fees and the Plaintiff finally moved for the Court to be relieved as counsel for the Defendant which motion was granted by Order dated November 25, 2019.

8. As of December 11, 2019, there is due and owing to the Plaintiff from the Defendant the total amount of \$161,671.96 for legal fees, costs and expenses as more particularly set forth in Exhibit A attached hereto and incorporated by reference.

9. As a proximate result of the Defendant's breach of the Representation Agreement, the Plaintiff has suffered a loss in the amount set forth above.

10. On page three of the Representation Agreement between the parties, the Defendant agreed to reimburse the Plaintiff for all costs incurred in collecting all unpaid fees, including reasonable attorney's fees and court costs.

SECOND CAUSE OF ACTION
(Money Had and Received)

11. The Plaintiff here restates the foregoing allegations and incorporates the same herein by references as if repeated verbatim.

12. The litigation in which the Plaintiff represented the Defendant involved determination and protection of the Defendant's rights and beneficial interest in property of the Eunice I. Page Trust and particularly the real property owned by that Trust located at 605 North Main Street, Summerville, South Carolina.

13. The Plaintiff is informed and believes that the above real property has been sold to a third party and the Defendant has, upon information and belief, obtained a substantial monetary benefit from liquidation of such Trust real property.

14. The Plaintiff is informed and believes that the Defendant should, in equity and good conscience, pay the Plaintiff for legal services rendered in that matter which resulted in the enrichment of the Defendant.

15. The Defendant has failed and refused to pay the fees and costs due to the Plaintiff and the Plaintiff has suffered the loss thereof.

THIRD CAUSE OF ACTION
(Constructive Trust)

16. The Plaintiff here restates the foregoing allegations and incorporates the same herein by reference as if repeated verbatim.

17. The Plaintiff represented the Defendant in litigation between himself and his brothers regarding the Trust EIP matter in case number 2014-ES-18-00592 in the Dorchester County Probate Court.

18. The Defendant has obtained a substantial monetary benefit in that case by receiving a substantial portion of the proceeds from the sale of the Trust real property located at 605 North Main Street, Summerville, South Carolina.

19. The Plaintiff is informed and believes that it is beneficially entitled to have its legal fees and costs paid from that money resulting from the case and, by virtue of the representation agreement, the Plaintiff has an interest or lien in the proceeds resulting from the disposition of Trust real property.

20. The Plaintiff is informed and believes that the Defendant has fiduciary duty to recognize, protect and pay the Plaintiff for legal services and costs from the Defendant's share of proceeds from the sale of the above real property of the Trust.

DECLARATORY JUDGMENT
(Security Interest)

21. The Plaintiff here restates the foregoing allegations and incorporates the same herein by reference as if repeated verbatim.

22. The Defendant had a beneficial interest in the real property of the Trust EIP located at 605 North Main Street, Summerville, South Carolina by virtue of the terms of the above referenced Trust.

23. On page three of the Representation Agreement between the parties, the Defendant granted to the Plaintiff a lien or security interest in any monetary judgment or award made to the Defendant in that case.

24. The Plaintiff gave value in the form of legal services and costs in consideration for that grant of a security interest or lien on the Defendant's proceeds from the case.

25. The Plaintiff is informed and believes that it has a security interest in the Defendant's proceeds from the litigated matter pursuant to SC Code annotated §36-9-203.

26. WHEREFORE, the Plaintiff prays that this Court issue judgment against the Defendant Albert T. Henson, Jr. in the following particulars:

- a. Judgment for Breach of Contract in the principal amount of \$161,671.96;
- b. In the alternative, Judgment for Money Had and Received in the principal amount of \$161,671.96;
- c. A judgment that the Plaintiff has a Constructive Trust on the Defendant's proceeds from the sale of assets in the Trust EIP;
- d. A Declaratory Judgment that the Plaintiff has a security interest in the Defendant's interest and account receivable from the Trust EIP and the Plaintiff has the right to enforce the Summary Judgment according to South Carolina law; and

- e. For such other and further relief as may be deemed trust and proper by the Court.

s/ F. Truett Nettles, II
F. Truett Nettles, II, Esq.
Rosen Hagood, LLC
P.O. Box 893
Charleston, SC 29402
(843) 577-6726
(843) 724-8036 (fax)
tnettles@rosenhagood.com

Attorney for the Plaintiff

December 16, 2020
Charleston, South Carolina

Date: 11/24/2020

Tabs3 Client Ledger Report Rosen Hagood, LLC

Page:

Primary Timekeeper: 60 Daniel F. Blanchard
Thru 12/27/2019

Date	Ref #	Stmt #	Fee Amount	Expense Amount	Advance Amount	Payment Amount	Apply to Stmt #	Bill Total	Balance Due
9634.000H Henson, Jr./Albe									
RE: Richard S. Henson, et al v. Albert T. Henson									
06/10/2016	1	1	2,900.00	2.35				2,902.35	2,902.35
06/17/2016	2	2				2,902.35R			0.00
07/15/2016	3	2	13,447.50	124.81	109.93			13,682.24	13,682.24
07/19/2016	4	3				7,097.65R	2		6,584.59
08/16/2016	5	3	4,840.00	68.36	296.59			5,204.95	11,789.54
08/18/2016	6	4				6,584.59R	2		5,204.95
09/14/2016	7	4	2,580.00	28.70	948.86			3,557.56	8,762.51
10/19/2016	8	5	3,990.00	51.86	205.51			4,247.37	13,009.88
11/17/2016	9	6	1,530.00	10.23				1,540.23	14,550.11
12/15/2016	10	7	10,410.00	46.10	25.00			10,481.10	25,031.21
01/18/2017	11	8	6,690.00	20.16	47.22			6,757.38	31,788.59
02/10/2017	12	9	1,530.00	37.09	1,157.70			2,724.79	34,513.38
03/02/2017	13	10				10,000.00R			24,513.38
03/14/2017	14	10	2,040.00	33.70				2,073.70	26,587.08
04/12/2017	15	11	1,320.00	63.74				1,383.74	27,970.82
05/16/2017	16	12	4,740.00	27.56	139.75			4,907.31	32,878.13
06/12/2017	17	13	11,910.00	64.41	123.78			12,098.19	44,976.32
07/13/2017	18	14	420.00		2,425.70			2,845.70	47,822.02
08/09/2017	19	15	5,700.00	12.20				5,712.20	53,534.22
09/18/2017	20	16	3,600.00	21.22	1,059.44			4,680.66	58,214.88
10/11/2017	21	17	6,750.00	38.40	121.50			6,909.90	65,124.78
11/10/2017	22	18	20,850.00	19.45	2,483.60			23,353.05	88,477.83
12/13/2017	23	19	6,960.00	44.19	1,799.40			8,803.59	97,281.42
01/16/2018	24	20	2,580.00	0.46	27.50			2,607.96	99,889.38
02/09/2018	25	21	870.00					870.00	100,759.38
03/09/2018	26	22	30.00					30.00	100,789.38
04/20/2018	27	23	60.00					60.00	100,849.38
05/11/2018	28	24	3,660.00	197.96				3,857.96	104,707.34
06/15/2018	29	25	420.00	3.36	56.85			480.21	105,187.55
07/24/2018	30	26	3,987.50	17.95	41.01			4,046.46	109,234.01
08/13/2018	31	27	510.00	3.99	76.96			590.95	109,824.96
09/19/2018	32	28	6,900.00	28.57				6,928.57	116,753.53
10/12/2018	33	29	1,260.00	2.10	-9.79			1,252.31	118,005.84
11/28/2018	34	30	1,440.00	14.00				1,454.00	119,459.84
12/14/2018	35	31	11,520.00	104.16	250.00			11,874.16	131,334.00
01/17/2019	36	32	5,730.00	8.20				5,738.20	137,072.20
02/18/2019	37	33	1,230.00					1,230.00	138,302.20
03/13/2019	38	34	900.00					900.00	139,202.20
04/18/2019	39	35	4,987.50	39.63				5,027.13	144,229.33
05/14/2019	40	36	750.00	4.00	50.00			804.00	145,033.33
06/13/2019	41	37	1,902.50					1,902.50	146,935.83
07/16/2019	42	38	505.00	0.50				505.50	147,441.33
08/08/2019	43	39	6,150.00	22.64	24.00			6,196.64	153,637.97
09/16/2019	44	40	1,920.00	0.65	25.84			1,946.49	155,584.46
10/07/2019	45	41	1,350.00					1,350.00	156,934.46
11/15/2019	46	42	1,435.00					1,435.00	158,369.46
12/11/2019	47	43	3,302.50					3,302.50	161,671.96
Subtotal			175,607.50	1,162.70	11,486.35	26,584.59		188,256.55	161,671.96

ROA 0014

EXHIBIT

A

Date: 11/24/2020

Tabs3 Client Ledger Report
Rosen Hagood, LLC

Page: 1

Primary Timekeeper: 60 Daniel F. Blanchard
Thru 12/27/2019

Date	Ref #	Stmt #	Fee Amount	Expense Amount	Advance Amount	Payment Amount	Apply to Stmt #	Bill Total	Balance Due
Total for Primary Timekeeper 6			175,607.50	1,162.70	11,486.35	26,584.59		188,256.55	161,671.96

ELECTRONICALLY FILED - 2020 Dec 16 4:13 PM - DORCHESTER - COMMON PLEAS - CASE#2020CP1802003

ROA 0015

SPECIAL NOTICE

THE FOLLOWING NOTICE IS GIVEN TO YOU IN THE EVENT THAT THE FEDERAL FAIR DEBT COLLECTIONS ACT APPLIES TO THIS COMMUNICATION.

The following statement provides you with notice of certain rights which you may have by law. Nothing in this statement modifies or changes the hearing date or response time specified in the attached documents or your need to take legal action to protect your rights in this matter. No provision of the following statement modifies or removes your need to comply with the local rules concerning the attached documents.

CONSUMER DISCLOSURE

This communication is made in an attempt to collect a debt or judgment and any information obtained will be used for that purpose only. Please be advised that if you notify Plaintiff's attorney in writing within thirty (30) days of this notice that all or a part of your obligation or judgment to the Plaintiff is disputed, then Plaintiff's attorney will mail to you a written verification of the obligations or judgment and the amounts owed to the Plaintiff. In addition to your written request within thirty (30) days, you will be provided with the name and address of the original creditor, if different from the current creditor.

ROA 0016



STATE OF SOUTH CAROLINA)
)
 COUNTY OF DORCHESTER)

VERIFICATION

The undersigned Affiant, having been duly sworn, deposes and says that he is the co-managing member of the Plaintiff, Rosen Hagood, LLC, and as such, has read the foregoing Summons and Complaint and the same is true and correct of his knowledge, information and belief and based on the business records of the Plaintiff.

H. Brewton Hagood

H. Brewton Hagood
 Rosen Hagood, LLC
 151 Meeting Street, Suite 400 (29401)
 P.O. Box 893
 Charleston, SC 29402
 (843) 577-6726
 (843) 724-8036 (fax)
 bhagood@rosenhagood.com

Co-Managing Member of
 Rosen Hagood, LLC

SWORN to before me this 16
 day of December, 2020.

Debra L. Hill

Name of Notary: Debra L. Hill
 (printed)

Notary Public for South Carolina
 My Commission Expires: 9-22-2030

STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTOR)

IN THE COURT OF COMMON PLEAS

Rosen Hagood, LLC,)

Plaintiff,)

C.A. No.: 2020-CP-18-02003

v.)

FILED-RECORDED

ANSWER OF *PRO SE* DEFENDANT

ALBERT T. HENSON, JR.

✓Albert T. Henson, Jr.,

1/27/2021
Cheryl Graham
Clerk of Court
Dorchester County

(Jury Trial Demanded)

Defendant.)

Defendant Albert T. Henson, Jr. hereby answers Plaintiff's Complaint and will respectfully show unto the Court the following:

For A First Defense
(By Way of a General Denial)

1. Allegations of Plaintiff's Complaint (or portions thereof) not admitted, qualified or explained are expressly denied.
2. In response to Paragraph 1 of Plaintiff's Complaint, Defendant is without sufficient information to admit or to deny the allegation as stated. The South Carolina Secretary of State does not list an entity by Plaintiff's name as authorized to do business in the State of South Carolina.
3. In response to Paragraph 2 of Plaintiff's Complaint, Defendant admits the allegations contained therein as stated.
4. In response to Paragraph 3 of Plaintiff's Complaint, Defendant admits the allegations contained therein.
5. In response to Paragraph 4 of Plaintiff's Complaint, Defendant denies the allegations as stated therein.

6. In response to Paragraph 5 of Plaintiff's Complaint, Defendant admits the allegations as stated therein.

7. In response to Paragraph 6 of Plaintiff's Complaint, Defendant denies the allegations as stated therein. Defendant's last payment to the plaintiff was on or about March 2, 2017. Thereafter, Defendant refused to pay the Plaintiff due to Defendant's concerns that Plaintiff was not properly representing Defendant's interest in the pending matter.

8. In response to Paragraph 7 of Plaintiff's Complaint, Defendant denies the allegations as stated. Defendant stopped paying the Plaintiff on or after March 2, 2017 due to Defendant's concerns that Plaintiff was not properly representing Defendant's interest in the pending matter. Defendant admits that Plaintiff was relieved as counsel of record on or about November 25, 2019.

9. In response to Paragraphs 8 and 9 of Plaintiff's Complaint, Defendant denies the allegations as stated therein.

10. In response to Paragraph 10 of Plaintiff's Complaint, Defendant denies he is responsible for any collection costs.

11. In response to Paragraph 11 of Plaintiff's Complaint, Defendant incorporates all previous corresponding responses of the previous allegations as alleged.

12. In response to Paragraph 12 of Plaintiff's Complaint, Defendant admits that a portion of what Defendant hired Plaintiff to do was to represent his interest in matters which included the trust identified therein.

13. In response to Paragraph 13 of Plaintiff's Complaint, Defendant admits the property in question has been sold, but denies the remaining allegations as stated.

Specifically, Defendant states that any amount received was in spite of, and not because of, any work allegedly performed by the Plaintiff in the pending matter.

14. In response to Paragraph 14 of Plaintiff's Complaint, Defendant denies the allegations as stated.

15. In response to Paragraph 15 of Plaintiff's Complaint, Defendant denies any money is owed to the Plaintiff.

16. In response to Paragraph 16 of Plaintiff's Complaint, Defendant incorporates all previous corresponding responses of the previous allegations as alleged.

17. In response to Paragraph 17 of Plaintiff's Complaint, Defendant admits that a portion of what Defendant hired Plaintiff to do was to represent his interest in matters which included the trust identified therein.

18. In response to Paragraph 18 of Plaintiff's Complaint, Defendant admits the property in question has been sold, but denies the remaining allegations as stated. Specifically, Defendant states that any amount received was in spite of, and not because of, any work allegedly performed by the Plaintiff in the pending matter.

19. In response to Paragraphs 19 and 20 of Plaintiff's Complaint, Defendant denies the allegations as stated.

20. In response to Paragraph 21 of Plaintiff's Complaint, Defendant incorporates all previous corresponding responses of the previous allegations as alleged.

21. In response to Paragraph 22 of Plaintiff's Complaint, Defendant admits that a portion of what Defendant hired Plaintiff to do was to represent his interest in matters which included the trust identified therein.

22. In response to Paragraphs 23, 24 and 25 of Plaintiff's Complaint, Defendant denies the allegations as stated therein.

23. In response to Paragraph 26 of Plaintiff's Complaint, Defendant denies he owes any money to the Plaintiff.

For A Second Defense
(Failure to State a Claim Upon Which Relief Can Be Granted)

24. Defendant incorporates all previous responses and defenses as if set forth fully herein.

25. Plaintiff's Second, Third and Forth Causes of Action are barred because they fail to state a claim upon which relief may be granted.

For A Third Defense
(Statute of Limitations)

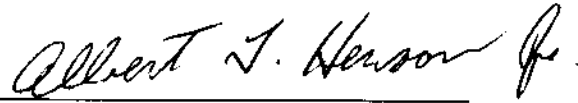
26. Defendant incorporates all previous responses and defenses as if set forth fully herein.

27. Due to concerns Defendant had about Plaintiff's legal representation of him in the matters pending, Defendant refused to pay the Defendant after March 2017.

28. Plaintiff's claim is barred by the applicable statute of limitations.

WHEREFORE, Defendant respectfully requests that the plaintiff's complaint be dismissed with prejudice, to award the Defendant the costs and fees incurred in defending the same, and for any other relief the Court believes is appropriate.

Respectfully submitted,



Albert T. Henson, Jr.
148 Pelzer Drive
Summerville, SC 29485
Phone: (843) 830-6869
Email: apitt153709@yahoo.com

***Pro Se* Defendant Albert T. Henson, Jr.**

January 26, 2021

DEFENDANT DEMANDS A TRIAL BY JURY.

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2020-CP-18-2003
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	
	)	MOTION FOR
vs.	)	SUMMARY JUDGMENT
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
_____	)	

The Plaintiff, ROSEN HAGOOD, LLC, by and through its undersigned counsel, hereby moves before this Honorable Court for a Summary Judgment pursuant to Rule 56 of the South Carolina Rules of Civil Procedure. This motion is based on the grounds that this Defendant is entitled to a judgment as a matter of law and there no genuine issue as to any material fact. This motion will be heard by the Presiding Judge for the Court of Common Pleas for Dorchester County, in the Dorchester County Courthouse, at 5200 E. Jim Bilton Boulevard, St. George, South Carolina at a time to be announced by the Court. This motion will be supported by the following:

1. Pleadings
2. Affidavit for Plaintiff – Exhibit 1
3. Deposition testimony of the Defendant – Exhibit 2
4. Defendant’s Admission as to the Genuineness of the representation letter – Exhibit 3

April 7, 2022.
Charleston, South Carolina

s/ F. Truett Nettles, II
F. Truett Nettles, II, Esq.
Rosen Hagood, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
(843) 577-6726
tnettles@rosenhagood.com
Attorney for the Plaintiff

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2020-CP-18-2003
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	
	)	AFFIDAVIT OF
vs.	)	DANIEL F. BLANCHARD, III, ESQ.
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
_____	)	

The undersigned Affiant, being duly sworn, deposes and says that:

1. I am an attorney and equity member of the Plaintiff law firm Rosen Hagood, LLC and I make this statement based on my personal knowledge and the records of this matter maintained in this law office.

2. In a Representation Agreement dated May 25, 2016, the Defendant agreed to the terms of legal representation in the litigation between the Defendant and his brothers Richard S. Henson and Van K. Henson regarding the Trust of his grandmother Eunice I. Page and the Probate Estate of his mother Ann Page Henson Pittillo pending in the Probate Court for Dorchester County and a copy of that signed agreement is attached hereto as Exhibit A and incorporated herein by reference.

3. Based on the terms and conditions of the Representation Agreement in this case, the Plaintiff law firm, primarily the undersigned Affiant, rendered legal services and advanced costs and expenses in this case and after a partial payment of the Defendant, there is now due and owing to the Plaintiff for professional services and costs in the total amount of \$161,696.96 and a copy of the summary of charges is attached hereto as Exhibit B and incorporated herein by reference.



4. After the Defendant failed and refused to pay the Plaintiff for professional services rendered and costs advanced, the Plaintiff moved before the Probate Court for Dorchester County to be relieved as counsel for this Defendant and that relief was granted by order of the Probate Court dated November 25, 2019 and a copy of that order being attached hereto as Exhibit C and incorporated herein by reference.

5. As a result of the litigation in these matters, I am informed that the Defendant has been awarded \$275,000.00 derived from the sale of trust assets and this Defendant may receive an additional \$150,000.00 in distributions from the Special Trustee appointed by the Probate Court.

6. This Affiant is informed and believes that it would not be fair and equitable for the Defendant to obtain the benefits of legal services rendered and then retain all of the money he received in the trust and probate litigation matters without paying the amounts due to the Plaintiff.

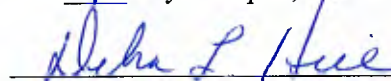
7. Pursuant to the Representation Agreement between Plaintiff and the Defendant, the Plaintiff has a security interest in the Defendant's awards and benefits arising from this representation and that lien is enforceable pursuant to SC Code Ann. 36-9-203 and the Plaintiff has given value to support this security interest and lien; the Defendant had the right to grant that security interest and lien to the Plaintiff and this grant of a security interest was authenticated in the Representation Agreement mentioned above.

FURTHER AFFIANT SAYETH NOT.

SWORN to and subscribed before me
this 7 day of April, 2022.



Daniel F. Blanchard, III, Esq.

 (L.S.)
Notary Public for South Carolina

Printed name: Debra L. Hill

My Commission Expires: 9-22-2030

DANIEL F. BLANCHARD III
dblanchard@rrhlawfirm.com

ROSEN | HAGOOD

May 25, 2016

Mr. Albert T. Henson, Jr.
148 Pelzer Drive
Summerville, SC 29485

Re: Estate of Ann Page Henson Pittillo and Trust of Eunice I. Page

Dear Al:

We are pleased to have the opportunity to be of service to you in the above matter. We look forward to working with you and will do our best to provide the highest quality legal services in a responsive, efficient manner.

Fundamental to a sound relationship is a clear understanding of the terms and conditions upon which we will be providing legal services. Accordingly, the purpose of this letter is to clarify and confirm these terms and conditions.

Scope of Services. You have asked us to represent you in defending you individually and/or in your capacity as personal representative of the Estate of Ann Page Henson Pittillo against claims being pursued in the Dorchester County Probate Court by Richard S. Henson and Vann K. Henson involving the Estate of Ann Page Henson Pittillo and the Trust of Eunice I. Page, including claims alleging that the will of Ann Page Henson Pittillo is invalid and claims alleging that the Trust of Eunice I. Page is the owner of certain real property located at 605 N. Main Street, Summerville, South Carolina.

Limitations on Obligation. You acknowledge that we are not your general counsel and that our acceptance of this engagement does not involve an undertaking to represent you in any matter other than that described herein-above.

Additional Services. While this letter is intended to deal with the specific legal services described above, these terms and conditions will also apply to any additional legal services that we may agree to provide that are outside the initial scope of our representation.

Staffing. I will be the attorney primarily responsible for the representation with assistance from other attorneys and paralegals in our practice group as appropriate from time to time. We intend to provide quality legal services in an efficient, economical manner. This sometimes necessitates involving other firm attorneys with the requisite expertise, and paralegals, who are not attorneys but are experienced in the preparation of documents and the completion of various tasks. When questions or comments arise about our services, staffing, billings, or other aspects of our representation, please contact me directly. It is important that you are satisfied with our services and responsiveness at all times.



Mr. Albert T. Henson, Jr.

May 25, 2016

Page 2

Responsibilities. In reliance upon information and guidance provided by you, we will provide legal counsel and assistance to you in accordance with this letter, keep you reasonably informed of progress and developments, and respond to your inquiries.

To enable us effectively to render these services, you agree to cooperate fully with us in all matters relating to the preparation and presentation of its case, to fully and accurately disclose to us all facts that may be relevant to the matter or that we may otherwise request, and to keep us apprised of developments relating to the matter. You will also be reasonably available to attend meetings and telephone conferences. In addition, you will be responsible for advising us whether any document we have prepared or received and sent to you for your approval or review reflects the principal terms of your proposed agreement or other expectations, as the case may be.

Either at the beginning or during the course of our representation, we may express our opinions or beliefs concerning the matter or various courses of action and the results that might be anticipated. Any such statement made by any member or employee of our firm is intended to be an expression of opinion only, based on information available to us at the time, and must not be construed by you as a promise, guarantee, or warranty of any particular result. No guarantees are possible in matters such as this.

Fees, Disbursements, and Other Charges. Contemporaneous with its acceptance of this agreement, you agree to deposit with Rosen, Rosen & Hagood, LLC an advance or retainer fee of \$10,000.00, which will be credited towards our fees and expenses in connection with our representation in this matter. The advance will be deposited in our general funds or escrow. We will charge our fees and expenses against the advance and credit them on our billing statements. In the event our fees or expenses exceed the advance deposited with us, we will bill you for the excess. Any unused portion of the deposit will be returned to you at the conclusion of our services.

The representation will be handled on an hourly fee basis and you agree to pay for legal services on an hourly fee basis. Our fees will be based on the amount of time spent by attorneys and paralegals on your matter. Each lawyer and paralegal has an hourly billing rate based generally on his or her experience and any special expertise. The rate multiplied by the time spent on your behalf, measured in tenths of an hour, will be evaluated by the billing attorney as the basis for determining the fee.

My billing rate in this matter will be \$300.00 an hour. Time devoted by our associate attorneys will be at billing rates of \$200.00 an hour and paralegals will be at billing rates of \$125.00 an hour. These rates are adjusted from time to time generally to reflect increased experience and special expertise of the attorneys and paralegals and inflationary cost increases affecting our practice, and the adjusted rates will apply to all services performed thereafter. We will send you advance notification of any adjustment to the billing rates.

Other factors may be considered in determining our fees, including the novelty and

Mr. Albert T. Henson, Jr.

May 25, 2016

Page 3

difficulty of the questions involved; the skill requisite to perform the services properly; the experience, reputation, and ability of those performing the services; the time limitations imposed by the client or the circumstances; the amount involved and results obtained; and any other factors that may be relevant under applicable rules of professional conduct. However, these factors will not result in our fees exceeding the indicated amounts based on our hourly rates without prior discussion with you.

In addition to our fees, we will expect payment for disbursements and other charges incurred on your behalf. You authorize us to incur all reasonable costs and to retain any investigators, consultants, or experts necessary in our judgment to investigate, evaluate, or pursue claims in this matter. You agree to promptly pay or reimburse us for all reasonable and necessary disbursements and other charges for investigating, preparing, and presenting your case and will remain responsible for payment or reimbursement of these disbursements and charges whatever may be the ultimate outcome of the matter. Disbursements and charges include fees and expenses of others (such as experts, investigators, witnesses, consultants, and court reporters), photocopying, messenger and delivery service, air freight, computerized research, videotape recording, travel (including mileage, parking, airfare, lodging, meals, and ground transportation), copy charges, record retrieval charges, court costs, filing fees, and other miscellaneous expenses associated with the pursuit of your claims.

Each month we will furnish the client with a statement describing our services rendered and separately showing disbursements and other charges in a format and with such detail as the client and we may agree. There often is an unavoidable delay in reporting disbursements and other charges, and therefore not all disbursements and charges may be billed at the same time as the related legal services. Our monthly statements submitted for our legal services are due upon receipt. If your account becomes delinquent for more than sixty (60) days, we may move to be relieved as counsel. If you fail to pay all amounts owed, then you agree to reimburse us for all costs incurred in collecting these amounts, including reasonable attorney's fees and costs.

Lien. If a monetary judgment or award is made in favor of the client, we shall have a lien on the proceeds to the extent of any unpaid fees, disbursements, or other charges.

Termination of Services. You have the right at any time to terminate our services and representation upon written notice to the firm. Such termination shall not, however, relieve the client of the obligation to pay for all services rendered and disbursements and other charges made or incurred on behalf of the client prior to the date of termination.

We reserve the right to withdraw from our representation with your consent or for good cause. Good cause may include your failure to honor the terms of the engagement letter, your failure to pay amounts billed in a timely manner, your failure to cooperate or follow our advice on a material matter, or any fact or circumstance that would, in our view, impair an effective attorney-client relationship or would render our continuing representation unlawful or unethical. If we elect to do so, you agree to take all steps necessary to free us of any obligation to perform further, including the execution of any documents (including forms for substitution of counsel)

Mr. Albert T. Henson, Jr.

May 25, 2016

Page 4

necessary to complete our withdrawal, and we will be entitled to be paid for all services rendered and disbursements and other charges made or incurred on behalf of the client prior to the date of withdrawal.

If you approve of and agree to the terms and conditions of our representation of you as set forth in this letter, please confirm your acceptance of same by signing the enclosed copy in the space provided below and return it to me along with the retainer fee. Upon acceptance, these terms and conditions will apply retroactively to the date we first performed services on your behalf.

This letter will not become effective and we will have no obligation to provide legal services until you sign and return the copy of this letter. We are pleased to have this opportunity to be of service and to work with you.

With best personal regards, I am

Sincerely,

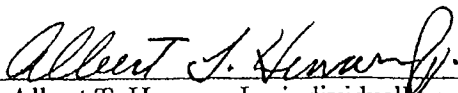
ROSEN, ROSEN & HAGOOD, LLC.



Daniel F. Blanchard, III

I hereby acknowledge and accept the fee arrangement and other terms and conditions as set forth in this letter.

Date: 5-25-16


Mr. Albert T. Henson, Jr., individually and
as personal representative of the Estate of
Ann Page Henson Pittillo

Primary Timekeeper: 60 Daniel F. Blanchard
Thru 12/27/2019

Date	Ref #	Stmt #	Fee Amount	Expense Amount	Advance Amount	Payment Amount	Apply to Stmt #	Bill Total	Balance Due
9634.000H Henson, Jr./Albe									
RE: Richard S. Henson, et al v. Albert T. Henson									
06/10/2016	1	1	2,900.00	2.35				2,902.35	2,902.35
06/17/2016	2	2				2,902.35R			0.00
07/15/2016	3	2	13,447.50	124.81	109.93			13,682.24	13,682.24
07/19/2016	4	3				7,097.65R	2		6,584.59
08/16/2016	5	3	4,840.00	68.36	296.59			5,204.95	11,789.54
08/18/2016	6	4				6,584.59R	2		5,204.95
09/14/2016	7	4	2,580.00	28.70	948.86			3,557.56	8,762.51
10/19/2016	8	5	3,990.00	51.86	205.51			4,247.37	13,009.88
11/17/2016	9	6	1,530.00	10.23				1,540.23	14,550.11
12/15/2016	10	7	10,410.00	46.10	25.00			10,481.10	25,031.21
01/18/2017	11	8	6,690.00	20.16	47.22			6,757.38	31,788.59
02/10/2017	12	9	1,530.00	37.09	1,157.70			2,724.79	34,513.38
03/02/2017	13	10				10,000.00R			24,513.38
03/14/2017	14	10	2,040.00	33.70				2,073.70	26,587.08
04/12/2017	15	11	1,320.00	63.74				1,383.74	27,970.82
05/16/2017	16	12	4,740.00	27.56	139.75			4,907.31	32,878.13
06/12/2017	17	13	11,910.00	64.41	123.78			12,098.19	44,976.32
07/13/2017	18	14	420.00		2,425.70			2,845.70	47,822.02
08/09/2017	19	15	5,700.00	12.20				5,712.20	53,534.22
09/18/2017	20	16	3,600.00	21.22	1,059.44			4,680.66	58,214.88
10/11/2017	21	17	6,750.00	38.40	121.50			6,909.90	65,124.78
11/10/2017	22	18	20,850.00	19.45	2,483.60			23,353.05	88,477.83
12/13/2017	23	19	6,960.00	44.19	1,799.40			8,803.59	97,281.42
01/16/2018	24	20	2,580.00	0.46	27.50			2,607.96	99,889.38
02/09/2018	25	21	870.00					870.00	100,759.38
03/09/2018	26	22	30.00					30.00	100,789.38
04/20/2018	27	23	60.00					60.00	100,849.38
05/11/2018	28	24	3,660.00	197.96				3,857.96	104,707.34
06/15/2018	29	25	420.00	3.36	56.85			480.21	105,187.55
07/24/2018	30	26	3,987.50	17.95	41.01			4,046.46	109,234.01
08/13/2018	31	27	510.00	3.99	76.96			590.95	109,824.96
09/19/2018	32	28	6,900.00	28.57				6,928.57	116,753.53
10/12/2018	33	29	1,260.00	2.10	-9.79			1,252.31	118,005.84
11/28/2018	34	30	1,440.00	14.00				1,454.00	119,459.84
12/14/2018	35	31	11,520.00	104.16	250.00			11,874.16	131,334.00
01/17/2019	36	32	5,730.00	8.20				5,738.20	137,072.20
02/18/2019	37	33	1,230.00					1,230.00	138,302.20
03/13/2019	38	34	900.00					900.00	139,202.20
04/18/2019	39	35	4,987.50	39.63				5,027.13	144,229.33
05/14/2019	40	36	750.00	4.00	50.00			804.00	145,033.33
06/13/2019	41	37	1,902.50					1,902.50	146,935.83
07/16/2019	42	38	505.00	0.50				505.50	147,441.33
08/08/2019	43	39	6,150.00	22.64	24.00			6,196.64	153,637.97
09/16/2019	44	40	1,920.00	0.65	25.84			1,946.49	155,584.46
10/07/2019	45	41	1,350.00					1,350.00	156,934.46
11/15/2019	46	42	1,435.00					1,435.00	158,369.46
12/11/2019	47	43	3,302.50					3,302.50	161,671.96
Subtotal			175,607.50	1,162.70	11,486.35	26,584.59		188,256.55	161,671.96



Date: 11/24/2020

Tabs3 Client Ledger Report
Rosen Hagood, LLC

Page: 2

Primary Timekeeper: 60 Daniel F. Blanchard
Thru 12/27/2019

Date	Ref #	Stmt #	Fee Amount	Expense Amount	Advance Amount	Payment Amount	Apply to Stmt #	Bill Total	Balance Due
Total for Primary Timekeeper 6			175,607.50	1,162.70	11,486.35	26,584.59		188,256.55	161,671.96

ELECTRONICALLY FILED - 2022 Apr 07 11:46 AM - DORCHESTER - COMMON PLEAS - CASE#2020CP1802003

STATE OF SOUTH CAROLINA	)	IN THE PROBATE COURT
	)	
COUNTY OF DORCHESTER	)	
	)	
IN RE: ESTATE OF ANN PAGE PITILLO	)	
	)	
RICHARD SCOTT HENSON, individually	)	Case No.: 2014-ES-18-00592
and as devisee and VANN KENNETH	)	
HENSON, individually and as devisee,	)	
Petitioners,	)	
	)	
v.	)	
	)	ORDER
ALBERT T. HENSON, JR., individually and as	)	
Personal Representative of the Estate of Ann Page	)	
Pittillo,	)	
Respondent,	)	
	)	
IN RE: TRUST EIP CREATED UNDER	)	
THE LAST WILL AND TESTAMENT OF	)	
EUNICE I. PAGE DATED OCTOBER 14, 1992	)	
	)	Case No.: 1994-ES-18-00147-2
RICHARD S. HENSON and VANN	)	
KENNETH HENSON,	)	
Petitioners,	)	
	)	
v.	)	
ALBERT T. HENSON, JR. and JULIAN REID	)	
HENSON,	)	
Respondent,	)	

2019 NO. 25 APR 11:49
CE

Upon motion of Rosen Hagood, LLC and Daniel F. Blanchard, III, Esquire (hereinafter "Movants"), the Court hereby grants the Movants' Motion to Withdraw as Counsel as follows. It is therefore,

ORDERED that Movants are hereby granted leave to withdraw from further representation of Respondent Albert T. Henson, Jr., individually and as Personal Representative of the Estate of Ann Page Pittillo (hereafter "Respondent"), effective immediately, and are hereby relieved as counsel for said party; and

FURTHER ORDERED that Respondent shall have 30 days from the date of entry of this Order to obtain replacement or substitute legal counsel and to have said replacement or substitute counsel file and serve a notice of appearance in these actions. Any hearings or other proceedings in these matters will be continued until such period has lapsed, with the exception of actions

14ME
11/25/19

ROA 0032



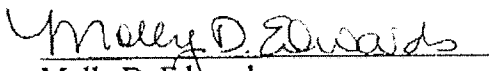
related to the extension of the mortgage, unless replacement or substitute counsel shall file a notice of appearance sooner; and

FURTHER ORDERED that, until further notice from Respondent and/or his replacement or substitute counsel, all notices, orders, or pleadings shall be sent to Respondent as follows:

Albert T. Henson, Jr.
148 Pelzer Drive
Summerville, SC 29485

The Clerk of Court shall note same in the Court's files; and

AND IT IS ORDERED!


Molly D. Edwards
Associate Probate Judge
Dorchester County Probate Court

St. George, South Carolina.

This 25th day of Nov., 2019.

2 UME
11/25/19

1 STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
2 COUNTY OF DORCHESTER) THE FIRST JUDICIAL CIRCUIT
3) CASE NO: 2020-CP-18-2003
4 ROSEN HAGOOD, LLC,)
5 Plaintiff,)
6 vs.)
7)
8 ALBERT T. HENSON, JR.,)
9 Defendant.)
10 _____)
11
12
13
14
15

16 The deposition of ALBERT T. HENSON, JR., taken
17 before Lori Webber, Stenographic Court Reporter and Notary
18 Public, at Rosen Hagood, 151 Meeting Street, Suite 400,
19 Charleston, South Carolina, on Wednesday, March 23, 2022,
20 commencing at 10:29 a.m.
21
22
23
24
25

1 A P P E A R A N C E S:

2 ROSEN HAGOOD

3 By: F. TRUETT NETTLES, II, Esq.

4 151 Meeting Street, Suite 400

5 Charleston, South Carolina 29401

6 (843) 577-6726

7 tnettles@rosenhagood.com

8 For the Plaintiff

9

10 ALBERT T. HENSON, JR.

11 148 Pelzer Drive

12 Summerville, South Carolina 29485

13 (843) 830-6869

14 apitt153709@yahoo.com

15 Pro Se Defendant

16

17 Also present: Daniel F. Blanchard, III, Esq.

18

19

20

21

22

23

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32

1 time.

2 MR. NETTLES: Number 1.

3 (Whereupon, Plaintiff's 1 was received
4 and marked for identification.)

5 BY MR. NETTLES:

6 Q I'm gonna hand you a letter from Rosen Hagood
7 to you dated May 25, 2016. And for this deposition, we've
8 marked this as Plaintiff's Exhibit 1.

9 A Okay.

10:43AM 10 Q Do you recognize that letter?

11 A Yes, I think so. I mean, unless something's
12 been changed. It looks familiar. I mean, I would imagine
13 it's -- it's got my signature on it.

14 Q All right. Is this your agreement to have
15 Rosen Hagood represent you in the estate of Ann Page
16 Henson Pittillo in the trust of Eunice I. Page? Do you
17 understand that's what this is?

18 A I understand that, but I don't -- there was
19 confusion on that, because Mr. Blanchard told me he didn't
10:44AM 20 represent me in all of it after many, many, many, many
21 years.

22 Q Which part did he not represent you in?

23 A I have no idea; I don't know. He just told me
24 that he wasn't, you know, attorney over both of these, you
25 know. So -- and that was at some point, and then it

1 seemed like he was; but I thought he was all along.

2 Q Look on the first page. In the middle it says
3 "Scope of Services."

4 A First page, "Scope of services."

5 Q Would you read that out loud for us.

6 A Can I read it through first?

7 Q Sure. Have you read just that paragraph?

8 A I'm trying to go back and read one part of that
9 paragraph. All right, sir.

10:46AM 10 Q Does the representation agreement say that
11 Rosen Hagood will represent you in defending you
12 individually and in your capacity as personal
13 representative of the estate of Ann Page Henson Pittillo?

14 A Yes, sir. That was my understanding.

15 Q Is he also representing you in some actions
16 involving your brothers Richard Henson and Van Henson in
17 the trust of Eunice I. Page? Did Mr. Blanchard represent
18 you in that, also?

19 A Initially, yes.

10:48AM 20 Q On page 2 at the bottom -- this letter, by the
21 way, is to you from Frank Blanchard. It's signed by both
22 of y'all. On the bottom of page 2 it says --

23 A Excuse me. Is this one that I can keep?

24 Q Yes.

25 A Okay. So this one up here --

1 MR. BLANCHARD: Is that the original or
2 a copy?

3 MR. NETTLES: It's a copy.

4 MR. BLANCHARD: Okay.

5 THE WITNESS: Okay. And now second
6 page?

7 BY MR. NETTLES:

8 Q Yeah. Down at the bottom, did you agree to pay
9 Frank Blanchard \$300 per hour for legal representation?

10:48AM 10 A Yes, sir.

11 Q On page 2 does it say when talking about fees,
12 disbursements, and other charges, that this law firm, now
13 Rosen Hagood, will advance costs in the case for like
14 court costs and depositions and things like that?

15 A Where is that?

16 Q It's in that first paragraph.

17 A Up at the top?

18 Q Well all of that is about fees and
19 disbursements. First of all, you paid some cash up front
10:50AM 20 to retain this firm; right?

21 A That's what it says here.

22 Q Well, did you?

23 A Yes, sir.

24 Q And did you get bills from this law firm on a
25 regular basis?

1 A Yes, sir.

2 Q And did you pay those legal fees on a monthly
3 basis?

4 A I don't know whether it was monthly, but I did
5 pay several bills.

6 Q Do you know how much you paid in all?

7 A I don't remember.

8 Q Do you remember when you stopped paying?

9 A Yes, sir.

10:50AM 10 Q When was that?

11 A I'm just trying to think through. I really
12 can't tell you the date, you know, what month or whatever
13 that was.

14 Q Okay. We'll come back to that, because I've
15 got some discovery things to talk about.

16 A Okay.

17 Q Look on page 3 in the second paragraph. The
18 third sentence.

19 A "You agree"?

10:51AM 20 Q "You agree to promptly pay or reimburse us for
21 all reasonable and necessary disbursements and other
22 charges for investigating, preparing, and presenting your
23 case and will remain responsible for payment or
24 reimbursements of these disbursements and charges,
25 whatever may be the ultimate outcome of the matter." Did

1 A I sought legal advice on everything I could. I
2 mean, I was trying to get attorneys to take whatever part
3 or all of it that they would take. Many --

4 Q I just wanna clarify, make sure that you and I
5 agree on these facts.

6 A Okay.

7 Q That you did not terminate Rosen Hagood as your
8 law firm.

9 A No, sir.

11:00AM 10 Q They continued to represent you until the Court
11 relieved them.

12 A They canceled me is what happened; okay?

13 Q Yes.

14 A Rosen Hagood told me that they weren't gonna
15 represent me; okay?

16 Q Okay.

17 A And I tried to get counsel as hard and fast as
18 I could.

19 Q Did you pay Rosen Hagood for the legal services
11:01AM 20 they provided to you up to the point when they withdrew
21 and the Court relieved them?

22 A There might have been some time in there. I
23 don't know the dates that well. I can't tell you for
24 sure. There may have been some time in between, but I
25 don't know how much.

1 Q Now look at the top of page 4. That's a
2 continuation of the discussion about termination.

3 A "If you approve"?

4 Q No, no.

5 A "Necessary"?

6 Q "And we will be entitled to be paid for all
7 services rendered and disbursements and other charges made
8 or incurred on behalf of the client prior to the date of
9 withdrawal." So the question is: Have you paid Rosen

11:01AM 10 Hagood for all services rendered and disbursements they
11 made up until the time they were relieved as your counsel?

12 A Say it just one more time, please.

13 Q Did you pay all the fees and charges from Rosen
14 Hagood up until the point where the Court relieved 'em?

15 A No, sir.

16 Q So there is money in there that you owe them?

17 A No, sir.

18 Q Why not?

19 A Because of the representation.

11:02AM 20 Q What representation?

21 A Or lack thereof.

22 Q When that representation didn't happen to your
23 satisfaction, did you fire Rosen Hagood?

24 A No, sir; I was trying to get somebody else, and
25 he said he quit and then he said he's quitting again and

1 A Oh, it existed. You know, it did exist.

2 Q But you don't have a copy of it; right?

3 A Well, you never know. It could still show; but
4 the fact of the matter is I know that it was, and I know
5 that I had it.

6 Q Did Frank ask you to give him a copy of it?

7 A I would have loved to have given him a copy of
8 it.

9 Q Did you give him a copy of it?

11:29AM 10 A No.

11 Q Was it ever in your possession?

12 A I'm certain it was.

13 Q And you blame Frank Blanchard because you
14 haven't been able to find it?

15 A That would be a real stretch; no.

16 Q It sure would.

17 A I don't.

18 Q Have you reviewed the bills that were sent to
19 you by the Rosen Hagood Law Firm?

11:29AM 20 A Say that again, please.

21 Q Have you reviewed the bills and statements that
22 were sent to you from the Rosen Hagood Law Firm?

23 A I looked at some of 'em, yes, but not all of
24 'em.

25 Q Well I was gonna ask you what in those bills do

1 you think you do not owe.

2 A I haven't looked at 'em in a long time, the
3 ones that I did look at I don't -- I don't really know. I
4 don't know; I'd have to go back and look at each and every
5 one.

6 Q Are you gonna do that before trial?

7 A If I have to, I guess I will.

8 Q Today do you know what part of the outstanding
9 bills that you think you do not owe to Rosen Hagood?

11:30AM 10 A I don't. I just don't.

11 Q In paragraph 7 of the answer that you filed --
12 do you not have a copy of that?

13 A No, sir.

14 Q Let me see if I've got one here. We made some
15 copies, I thought. Hold on.

16 (Whereupon, Plaintiff's 3 was received
17 and marked for identification.)

18 BY MR. NETTLES:

19 Q I just handed you a copy of the answer that you
11:31AM 20 filed in this lawsuit. It's marked Plaintiff's Exhibit 3.

21 A Yes, sir.

22 Q And it says in paragraph 7 on page 2 that you
23 made the last payment to Rosen Hagood on March 2, 2017.

24 A I don't remember.

25 Q Well you wrote this, didn't you?

1 was some of the things that he had jotted down when we
2 talked -- or he talked to other people, some of the notes
3 when we were together, some of those things. I think they
4 were all handwritten by him, his handwritten notes that he
5 kept.

6 Q Did you get any Rosen Hagood files or files
7 maintained or created by Frank Blanchard? Did you get any
8 of those files from any of your other lawyers?

9 A I don't know what you're referring to, really.

12:08PM 10 Just ask me one more time.

11 Q Well, did the lawyers Duffy & Young, did they
12 get any of these files?

13 A You know what, I think they may have looked at
14 'em, yeah.

15 Q Did you sign a settlement agreement agreeing
16 that 605 North Main would sell at a certain price and the
17 mortgage would be paid off and that you and your two
18 brothers would split the remaining money? Did you ever
19 sign an agreement like that?

12:09PM 20 A Well I could have, but I don't remember it.
21 I'll put it like that.

22 Q Well did you agree to that?

23 A What was going on that day in that courtroom is
24 hard to explain. But there was a lot of stuff. And it
25 was more confusion than I've ever seen. And people waving

1 papers over their head and carrying on and getting caught
2 bald-face not telling the truth. It was the biggest and
3 most-bizarre thing I've ever been in. And I thought we
4 had an understanding of things, but it was way, way
5 different than that. So I don't know really any more than
6 that. It was just like I can't -- it's hard to describe.
7 That's all I can say.

8 Q Did you agree?

9 A I don't know if I did or not. That's my
12:10PM 10 question and final answer; I don't know. I really don't
11 know.

12 Q If you remember between now and the trial date,
13 do you agree that you'll tell me "Oh, now I remember I did
14 agree or did not agree"?

15 A I'd have to see it; but I'm telling you, it was
16 chaos and you wouldn't believe it. But if you have a
17 copy, I'll take it.

18 MR. NETTLES: We're gonna take a little
19 recess and I'm gonna talk with Mr. Blanchard, and then
12:11PM 20 we're gonna come back together and you are welcome to say
21 anything else that you want. And in the meanwhile, if you
22 need a Coke or some more water or --

23 THE WITNESS: How long do you think
24 you'll be?

25 MR. NETTLES: Just 10 minutes before we

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF DORCHESTER	)	
Rosen Hagood, LLC,	)	
	)	C.A. No.: 2020-CP-18-02003
Plaintiff,	)	
	)	DEFENDANT'S RESPONSE TO
v.	)	PLAINTIFF'S REQUEST TO ADMIT
	)	THE GENUINENESS OF DOCUMENTS
Albert T. Henson, Jr.,	)	
	)	
Defendant.	)	

TO: F. TRUETT NETTLES, II, ESQ. ATTORNEY FOR PLAINTIFF ROSEN HAGOOD, LLC.

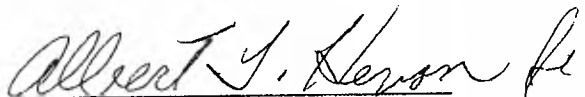
REQUEST NO. 1:

A legal representation agreement dated May 25, 2016 signed by Daniel F. Blanchard, III, on behalf of the Plaintiff and by the Defendant, Albert T. Henson, Jr.

RESPONSE:

Admitted.

Respectfully submitted,



Albert T. Henson, Jr.
148 Pelzer Drive
Summerville, SC 29485
Phone: (843) 830-6869
Email: apitt153709@yahoo.com

Pro Se Defendant Albert T. Henson, Jr.

March 10, 2021



STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

IN THE COURT OF COMMON PLEAS

Rosen Hagood, LLC,
Plaintiff,

C.A. No.: 2020-CP-18-02003

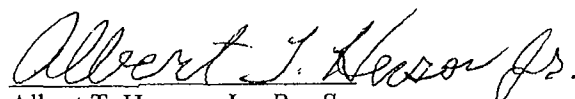
v.

CERTIFICATE OF SERVICE

Albert T. Henson, Jr.
Defendant.

I, Albert T. Henson, Jr., do hereby certify that I have served a true copy of
DEFENDANT'S RESPONSE TO PLAINTIFF'S REQUEST TO ADMIT THE
GENUINENESS OF DOCUMENTS upon the following person(s):

Via U.S. Mail Only: F. Truett Nettles, II, Esq.
Rosen Hagood, LLC
P O Box 893
Charleston, SC 29402


Albert T. Henson, Jr., *Pro Se*

Summerville, South Carolina

March 10, 2021

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2020-CP-18-2003
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	
vs.	)	CERTIFICATE OF MAILING
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
	)	

On behalf of Rosen Hagood, LLC, the Plaintiff in the above-captioned matter, I hereby certify that I am an employee of Rosen Hagood, LLC, and that I have served a copy of the below-noted documents upon the addressed below-named by placing the same in the United States Mail, proper First Class pre-paid postage affixed thereto and via electronic communication, on this 7th day of April 2022.

Documents: 1. Plaintiff's Motion for Summary Judgment
 2. Affidavit of Daniel F. Blanchard, III, Esq. with three exhibits
 3. Deposition testimony of the Defendant
 4. Defendant's Admission as to the Genuineness of the representation letter

Address: Albert T. Henson, Jr.
 148 Pelzer Drive
 Summerville, SC 29485

Albert T. Henson, Jr.
 1131 Lazy Lane Court
 Mount Pleasant, SC 29464

Email: apitt153709@yahoo.com

Debra L. Hill
 Legal Assistant to F. Truett Nettles, II
 Rosen Hagood, LLC
 151 Meeting Street, Suite 400
 Charleston, SC 29401
 (843) 577-6726 (o)

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

ROSEN HAGOOD, LLC,

IN THE COURT OF COMMON PLEAS
FOR THE FIRST JUDICIAL CIRCUIT
CASE NO.: 2020-CP-18-2003

Plaintiff,

vs.

ALBERT T. HENSON, JR.,

Defendant.

FILED-RECORD 71

2022 MAY 31 PM 4: 59

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

DEFENDANT'S OPPOSITION TO MOTION
FOR SUMMARY JUDGEMENT

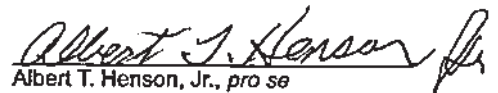
Pursuant to Rule 56 of the South Carolina Rules for Civil Procedure, Defendant, Albert T. Henson, Jr., appearing *pro se*, submits this opposition to the pending Motion for Summary Judgement, on file herein, to demonstrate to the Court that there is a genuine issue of material fact in this case that precludes the entry of a judgement as a matter of law.

This opposition is based upon and supported by the following affidavit and exhibits attached hereto, and any argument that the Court may allow at the time of hearing.

1. Affidavit of Defendant - Exhibit 1
2. Deposition Testimony of the Defendant - Exhibit A
3. Bill from Duggan Wynn Law Firm, LLC - Exhibit B
4. Email from Brian Duffy - Exhibit C

I have had difficulty getting counsel to appear with me at the hearing for the Motion for Summary Judgement. For this reason, I am requesting an extension of 10 days for this hearing.

May 31, 2022
Summerville, South Carolina


Albert T. Henson, Jr., *pro se*
148 Pelzer Drive
Summerville, South Carolina 29485
Phone: (843) 830-6869
Email: apitt153709@yahoo.com

Albert T. Henson, Jr., *pro se*

Plaintiff,

vs.

ALBERT T. HENSON, JR.,

Defendant.

FILED-RECORDED

2022 MAY 31 PM 4:59

AFFIDAVIT OF ALBERT T. HENSON, JR.

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

The undersigned Affiant, being duly sworn, deposes and says that:

1. I am a resident of the state of South Carolina. I have personal knowledge of the facts herein, and if called as a witness, could testify completely thereto. I am the *pro se* Defendant.
2. I hired Daniel F. Blanchard, attorney for Plaintiff law firm, Rosen Hagood, LLC, on May 25, 2016.
3. I lost confidence in Mr. Blanchard's ability to serve my best interest and in his loyalty to me when he told me that the opposing counsel, Barry Baker, was his "boss's best friend." In my deposition I state the following regarding payment to Rosen Hagood, LLC: "I was already really distraught in what was going on. But I know that I quit when Mr. Blanchard told me that Barry Baker was his boss's best friend. and that's what really stirred me up. I mean, it got me upset; I didn't know what to do. And I was looking continually for..." Please see attached Exhibit A (page 20, lines 2-7).
4. I started to realize the two law firms, Mr. Blanchard's firm and Mr. Baker's firm, were too friendly and that Mr. Blanchard's boss's relationship with Mr. Baker was impacting his decisions regarding my case. My last payment to Rosen Hagood, LLC was March 2, 2017. On two separate occasions, Mr. Blanchard told me that the partners did not want him to work on the case anymore. He told me that I would need to make more payments or he would be quitting. I was determined to find other counsel, but I was unsuccessful in my search until August of 2018.
5. In August of 2018, I hired Jourdan Page with Duggan Wynn Law Firm, LLC to review the case, and she agreed to take the case. After speaking with Mr. Blanchard, she told me that he told her he was still in charge of the case and was not leaving. She was no longer interested in taking the case. I paid her \$740 for her services. (Exhibit B)
6. Mr. Blanchard withdrew from my case in November 2019, over a year after speaking with Ms. Page. I was represented by other legal counsel at the final hearing before the presiding Probate Judge in the underlying trust case, and the Court divided the corpus of the trust equally between me and my two brothers. The Plaintiff states that I did not object or appeal to that ruling. However, I had telephone conversations or in person meetings with all three of my attorneys beginning the following day. All of the counsel knew of my questions and opposition to the settlement. I asked each one about appealing the ruling. They all told me that it was unappealable. I have attached a follow-up email from Brian Duffy in Exhibit C.

FURTHER AFFIANT SAYETH NOT.

Exhibit
1

SWORN to and subscribed before me
this 31 day of May, 2022.

Albert T. Henson, Jr.
Albert T. Henson, Jr.

William Rife (L.S.)
Notary Public for South Carolina

Printed name: WILLIAM RIFE

My Commission Expires: 01/24/2032



FILED-RECORDED
2022 MAY 31 PM 5:01
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Deposition of Albert T. Henson, Jr.

5 (17 - 20)

Page 17

Page 18

FILED-RECORDED

2022 MAY 31 PM 4:59

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

1 you agree to that?
2 A That's what it says in here, and I signed this.
3 Q Right.
4 A So yes.
5 Q So you did agree.
6 A Yes.
7 Q Now go to the next paragraph, the third
8 sentence. It says "Our monthly statements submitted for
9 our legal services are due upon receipt."
10:52AM 10 A Yes, sir.
11 Q Did you agree to that?
12 A Yes, sir.
13 Q Have you paid Rosen Hagood all of the money
14 they have billed you for their legal services?
15 A I don't even know what the bills were, to be
16 honest with you. I don't know the total bills that y'all
17 had.
18 Q Well, do you have any documents that would tell
19 you what you do or do not owe to Rosen Hagood?
10:53AM 20 A I was sent bills, yes.
21 Q Okay. Did you ever dispute those bills?
22 A Let me just stop and think.
23 Q Okay. Have you paid Rosen Hagood for all the
24 services that they've rendered to you?
25 A I would say that -- that I wasn't getting what

1 I bargained for. In other words, I don't feel like I was
2 getting -- you know, when I quit paying, it was because of
3 things that were going on. And it was, you know -- I'll
4 just leave it there.
5 Q Did you ever ask the Court to terminate them as
6 your attorney?
7 A Mr. Blanchard told me he was going to quit, and
8 I said "Okay." I mean, it wasn't the happiest thing I had
9 heard. I was hoping we could get what was going on
10:55AM 10 straightened out, and he said he was leaving. And I was
11 already looking for counsel, and I continued to look for
12 counsel. And he still was doing some things, but not what
13 I wanted and -- anyway...
14 Q Did you ever move before the Court yourself to
15 terminate this law firm as your legal counsel?
16 A No, sir; I was trying to get counsel, you know,
17 lined up. But he'd already said he was leaving. He said
18 he wasn't gonna do any more on it; and that was, you know
19 --
10:55AM 20 Q Did Mr. Blanchard get an order from the Court
21 relieving him as your attorney?
22 A Yes, sir. But two times before that he told me
23 he quit and he wasn't going to represent me, that the firm
24 didn't want him working for me. And I said the second
25 time I was fortunate enough to get somebody; and she

Page 19

Page 20

1 talked to Mr. Blanchard, and he told her -- from what she
2 told me -- was that he was still in charge of this case
3 and basically that he wasn't going anywhere. But he'd
4 already told me twice that he was leaving. So I was
5 planning and trying to do that. I was trying to get
6 somebody else in there, and she was ready to go. I paid
7 her to study the things that I had and then --
8 Q After Mr. Blanchard was relieved as your
9 attorney by the order of the Court --
10:56AM 10 A Uh-huh (witness indicated an affirmative
11 response).
12 Q -- why didn't that person then begin to
13 represent you?
14 A Well maybe they had other things to do; I don't
15 know. They said that they weren't gonna do it. I think
16 it was because he -- Mr. Blanchard and these attorneys had
17 a lengthy conversation approaching an hour. And I think
18 that he persuaded them not to get involved with it or that
19 he was still in charge of it. That's the way they told
10:57AM 20 me.
21 Q Who told you that?
22 A Attorney Page.
23 Q Have you paid every statement or bill sent to
24 you by Rosen Hagood?
25 A No, sir; I have not paid every statement that

1 y'all sent me. I quit paying when -- I know for sure, if
2 it wasn't before then, I was already really distraught in
3 what was going on. But I know that I quit when
4 Mr. Blanchard told me that Barry Baker was his boss's best
5 friend, and that's what really stirred me up. I mean, it
6 got me upset; I didn't know what to do. And I was looking
7 continually for --
8 Q Look on page 3. At the bottom in bold print it
9 says "Termination of Services."
10:58AM 10 A Yeah.
11 Q It says "You have the right at any time to
12 terminate our services and representation upon written
13 notice to the firm."
14 A Right.
15 Q Did you do that?
16 A No, sir; y'all terminated first. And I was
17 trying to catch up and get another attorney.
18 Q Well when you stopped making payments --
19 A Uh-huh (witness indicated an affirmative
10:58AM 20 response).
21 Q -- why didn't you terminate the law firm if you
22 didn't wanna pay them for the legal work they were doing?
23 A Well at different times there was next to
24 nothing going on; okay? I would have conversations, and
25 that was it.

Exhibit
A



Duggan Wynn Law Firm, LLC

Attorneys and Counselors at Law

FILED-RECORDED

2022 MAY 31 PM 4: 59

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Duggan Wynn Law Firm, LLC
44 Markfield Drive, Suite E
Charleston, SC 29407
843-414-7730
www.dugganlawfirm.com

September 17, 2018

Al Henson
148 Pelzer Dr.
Summerville, SC 29485

Invoice Number: 6659

Invoice Period: 08-20-2018 - 12-03-2018

RE: Estate Administration of Eunice I. Page & Ann P. Page 1 (1991-1)

Time Details

Date	Professional	Description	Hours	Rate	Amount
08-20-2018	Jourdan T. Page	Al Henson - initial conference with client.	0.50	185.00	92.50
08-21-2018	Jourdan T. Page	Al Henson - deed search; Conference with James Duggan; Telephone call with client.	0.80	185.00	148.00
08-22-2018	Jourdan T. Page	Al Henson - consultation meeting with James Duggan.	1.00	185.00	No Charge
08-22-2018	Jourdan T. Page	Al Henson - Telephone call with Frank Blanchard	1.00	185.00	185.00
08-23-2018	Jourdan T. Page	Al Henson - Telephone call with client.	0.40	185.00	74.00
08-24-2018	Jourdan T. Page	Review probate court file for Estate of Eunice I. Page	1.00	185.00	185.00
08-27-2018	Jourdan T. Page	Telephone call with Al.	0.30	185.00	55.50
			Total		740.00

Time Summary

Professional	Hours	Rate	Amount
Jourdan T. Page	5.00	148.00	740.00
Total			740.00

Expenses

Date	Description	Qty	Amount
12-03-2018	3% Card Pmt. Svc. Chg.	1	22.20
Total Expenses			22.20

Invoice Number: 6659

We appreciate your business!

Page 1 of 3

Exhibit
B

ROA 0053

Total for this Invoice	762.20
Previous Balance	(762.20)
Total Amount to Pay as of 03-18-2022	0.00

FILED-RECORDED
2022 MAY 31 PM 5:00
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Client Statement of Account

As of 03-18-2022

Open Invoices and Credits

Date	Transaction	Matter	Amount	Applied	Balance
------	-------------	--------	--------	---------	---------

There are no open Invoices or Credits

FILED-RECORDED
2022 MAY 31 PM 5:00
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

RE: Henson v. HENSON

FILED-RECORDED

From: Brian Duffy (bduffy@duffyandyoung.com)

2022 MAY 31 PM 5: 00

To: apitt153709@yahoo.com

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Date: Wednesday, March 18, 2020, 02:06 PM EDT

Hello Al.

I am following up on our most recent discussion. I addressed your concerns on the loan issue and understand that the loan was factored into the property valuation and your respective shares of the value, and that the issue was addressed directly the day of the settlement.

I do not have the transcript yet, but it appears that the agreement is clear and was set in stone on the record after significant negotiation. I do not think you can change any of that – at least not without the agreement of both of your brothers.

I do think you have some good options and, of note, a resolution that avoided a longer and more expensive battle.

Best,

Brian

Brian C. Duffy, Esq. | 843.720.2044 | www.duffyandyoung.com

Exhibit
C

FILED-RECORDED

2022 MAY 31 PM 5:00

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Plaintiff,

CERTIFICATE OF SERVICE

vs.

ALBERT T. HENSON, JR.,

Defendant.

I, Albert T. Henson, Jr., do hereby certify that I have served a true copy of DEFENDANT'S OPPOSITION TO MOTION FOR SUMMARY JUDGEMENT upon the following person(s):

Via U.S. Mail:
F. Truett Nettles, II, Esq.
Rosen Hagood, LLC
P O Box 893
Charleston, SC 29402 Summerville, South Carolina

Via Email: tnettlles@rosenhagood.com

May 31, 2022
Summerville, South Carolina


Albert T. Henson, Jr., pro se

ROA 0057

Certificate of Electronic Notification

Recipients

Maite Murphy - Notification transmitted on 06-30-2022 04:53:31 PM.

Forrest Nettles - Notification transmitted on 06-30-2022 04:53:31 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2020CP1802003

Official File Stamp: 06-30-2022 04:53:05 PM

Court: CIRCUIT COURT

Common Pleas

Dorchester

Case Caption: Rosen Hagood Llc VS Albert T Henson Jr

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Filed by or on behalf of: Becky Stevens

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The following people were served electronically:

Forrest Truett Nettles, II for Rosen Hagood Llc

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Albert T Henson, Jr for Albert T Henson, Jr

Albert T Henson, Jr for Albert T Henson, Jr

Deposition of Albert T. Henson, Jr.

1 (1 - 4)

Page 1

Page 2

1 STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS

2 COUNTY OF DORCHESTER) THE FIRST JUDICIAL CIRCUIT

3) CASE NO: 2020-CP-18-2003

4 ROSEN HAGOOD, LLC,)

5 Plaintiff.)

6 vs.)

7)

8 ALBERT T. HENSON, JR.,)

9 Defendant.)

10 _____)

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16 The deposition of ALBERT T. HENSON, JR., taken

17 before Lori Webber, Stenographic Court Reporter and Notary

18 Public, at Rosen Hagood, 151 Meeting Street, Suite 400,

19 Charleston, South Carolina, on Wednesday, March 23, 2022,

20 commencing at 10:29 a.m.

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23

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25

1 APPEARANCES:

2 ROSEN HAGOOD

By: F. TRUETT NETTLES, II, Esq.

3 151 Meeting Street, Suite 400

Charleston, South Carolina 29401

(843) 577-6726

4 tnetles@rosenhagood.com

5 For the Plaintiff

6

ALBERT T. HENSON, JR.

7 148 Pelzer Drive

Summerville, South Carolina 29485

(843) 830-6869

8 apitu153709@yahoo.com

9 Pro Se Defendant

10

Also present: Daniel F. Blanchard, III, Esq.

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Page 17

1 you agree to that?

2 A That's what it says in here, and I signed this.

3 Q Right.

4 A So yes.

5 Q So you did agree.

6 A Yes.

7 Q Now go to the next paragraph, the third

8 sentence. It says "Our monthly statements submitted for

9 our legal services are due upon receipt."

10:52AM 10 A Yes, sir.

11 Q Did you agree to that?

12 A Yes, sir.

13 Q Have you paid Rosen Hagood all of the money

14 they have billed you for their legal services?

15 A I don't even know what the bills were, to be

16 honest with you. I don't know the total bills that y'all

17 had.

18 Q Well, do you have any documents that would tell

19 you what you do or do not owe to Rosen Hagood?

10:53AM 20 A I was sent bills, yes.

21 Q Okay. Did you ever dispute those bills?

22 A Let me just stop and think.

23 Q Okay. Have you paid Rosen Hagood for all the

24 services that they've rendered to you?

25 A I would say that -- that I wasn't getting what

Page 19

1 talked to Mr. Blanchard, and he told her -- from what she

2 told me -- was that he was still in charge of this case

3 and basically that he wasn't going anywhere. But he'd

4 already told me twice that he was leaving. So I was

5 planning and trying to do that. I was trying to get

6 somebody else in there, and she was ready to go. I paid

7 her to study the things that I had and then --

8 Q After Mr. Blanchard was relieved as your

9 attorney by, the order of the Court --

10:56AM 10 A Uh-huh (witness indicated an affirmative

11 response).

12 Q -- why didn't that person then begin to

13 represent you?

14 A Well maybe they had other things to do; I don't

15 know. They said that they weren't gonna do it. I think

16 it was because he -- Mr. Blanchard and these attorneys had

17 a lengthy conversation approaching an hour. And I think

18 that he persuaded them not to get involved with it or that

19 he was still in charge of it. That's the way they told

10:57AM 20 me.

21 Q Who told you that?

22 A Attorney Page.

23 Q Have you paid every statement or bill sent to

24 you by Rosen Hagood?

25 A No, sir; I have not paid every statement that

Page 18

1 I bargained for. In other words, I don't feel like I was

2 getting -- you know, when I quit paying, it was because of

3 things that were going on. And it was, you know -- I'll

4 just leave it there.

5 Q Did you ever ask the Court to terminate them as

6 your attorney?

7 A Mr. Blanchard told me he was going to quit, and

8 I said "Okay." I mean, it wasn't the happiest thing I had

9 heard. I was hoping we could get what was going on

10:55AM 10 straightened out, and he said he was leaving. And I was

11 already looking for counsel, and I continued to look for

12 counsel. And he still was doing some things, but not what

13 I wanted and -- anyway...

14 Q Did you ever move before the Court yourself to

15 terminate this law firm as your legal counsel?

16 A No, sir; I was trying to get counsel, you know,

17 lined up. But he'd already said he was leaving. He said

18 he wasn't gonna do any more on it; and that was, you know

19 --

10:55AM 20 Q Did Mr. Blanchard get an order from the Court

21 relieving him as your attorney?

22 A Yes, sir. But two times before that he told me

23 he quit and he wasn't going to represent me, that the firm

24 didn't want him working for me. And I said the second

25 time I was fortunate enough to get somebody; and she

Page 20

1 y'all sent me. I quit paying when -- I know for sure, if

2 it wasn't before then, I was already really distraught in

3 what was going on. But I know that I quit when

4 Mr. Blanchard told me that Barry Baker was his boss's best

5 friend, and that's what really stirred me up. I mean, it

6 got me upset; I didn't know what to do. And I was looking

7 continually for --

8 Q Look on page 3. At the bottom in bold print it

9 says "Termination of Services."

10:58AM 10 A Yeah.

11 Q It says "You have the right at any time to

12 terminate our services and representation upon written

13 notice to the firm."

14 A Right.

15 Q Did you do that?

16 A No, sir; y'all terminated first. And I was

17 trying to catch up and get another attorney.

18 Q Well when you stopped making payments --

19 A Uh-huh (witness indicated an affirmative

10:58AM 20 response).

21 Q -- why didn't you terminate the law firm if you

22 didn't wanna pay them for the legal work they were doing?

23 A Well at different times there was next to

24 nothing going on; okay? I would have conversations, and

25 that was it.

1 STATE OF SOUTH CAROLINA)
2 COUNTY OF DORCHESTER) COURT OF COMMON PLEAS NONJURY

3
4 ROSEN HAGOOD, LLC,) TRANSCRIPT
5 PLAINTIFF,) OF
6 VS.) RECORD
7 ALBERT T. HENSON, JR.,) 2020-CP-18-2003
8 DEFENDANT.)

9
10 June 1st, 2022

11
12 B E F O R E:

13 THE HONORABLE EDGAR W. DICKSON, Judge.

14
15 A P P E A R A N C E S:

16 F. TRUETT NETTLES, II
17 ESQ.
Attorney for the Plaintiff

18 ALBERT T. HENSON, JR.
19 Pro Se

20
21
22 Transcribed by PAMELA E. GREEN, from
23 webEx Recording Only
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I N D E X O F W I T N E S S E S

(WHEREUPON, there were no exhibits marked or testimony taken during this hearing.

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P R O C E E D I N G S

THE CLERK: Judge, the next one up would be Rosen Hagood, LLC versus Albert Henson. I believe Mr. Nettles is here on behalf of the plaintiff and there are two motions by the plaintiff, a motion to compel discovery, and a motion for summary judgment.

THE COURT: Okay. And is, is Mr. Henson here?

MR. HENSON: Yes, sir.

MR. NETTLES: Yes, he is, Your Honor.

THE COURT: Okay. And---

MR. NETTLES: I don't know whose -- you're not his attorney?

MS. BUXTON: No, I'm not his attorney. I'm Sara Buxton.

THE COURT: Okay. And --.

THE CLERK: She'll have to move over.

MS. BUXTON: I can move over here.

THE COURT: Okay.

MR. HENSON: You've met and -- met her?

MS. BUXTON: Yeah, we met.

MR. NETTLES: Yeah.

MR. HENSON: Okay. Yeah.

THE COURT: Okay. And you're, you're Mr. Henson?

MR. HENSON: Yes, sir.

1 THE COURT: Okay. And, Mr. Henson, do you have an
2 attorney representing you?

3 MR. HENSON: I wouldn't -- no, sir.

4 THE COURT: Is there -- is -- I mean are you prepared
5 to go forward?

6 I've got two judgments -- I mean, excuse me, two
7 motions that Mr. Nettles has filed on behalf of the
8 plaintiff, a motion to compel some discovery. Apparently
9 some documents were served on you that you needed to answer.
10 And then another one requesting summary judgment in this
11 matter.

12 Have -- are you prepared to go forward with this?

13 (WHEREUPON, there was no response.)

14 THE COURT: Mr., Mr. Henson?

15 MR. HENSON: I'd like to get counsel, Your Honor. If I
16 can have some more time to get counsel.

17 THE COURT: Well now the, the case was filed -- it's a
18 two year old case right now.

19 MR. HENSON: Yes, sir.

20 THE COURT: So why haven't you gotten an attorney
21 before now?

22 MR. HENSON: I found it to be nearly impossible to get
23 an attorney to go against another attorney especially in a
24 tight community like Charleston, Broad Street, Meeting, and
25 those streets. And, and it's just been nearly impossible.

1 It's a lot and a smaller firm really -- can't really
2 handle it because it's so much paperwork. But the -- I'm
3 nervous as a cat and I apologize and I -- I'm, I'm sorry I
4 didn't get everything in -- done just right. It's just been
5 exhausting for me to have to try to do this paperwork. I
6 can't -- I'm not really capable.

7 So I, I -- where was I?

8 I forgot now. I was --.

9 THE COURT: Well, well --.

10 MR. HENSON: Yeah, you -- could you ask me the question
11 again?

12 THE COURT: Well, I was just wondering -- I wanted to
13 know why you haven't hired an attorney. This case is
14 essentially two years old and, you know, you've had plenty
15 of time to hire an attorney.

16 MR. HENSON: Yes, sir, I've talked to probably -- many,
17 many attorneys. I've talked to 21 that I could think of off
18 the top of my head that I'd talked to. And some of those
19 attorneys have -- I mean it's a small community like I said.

20 They don't want to go anywhere near or against Frank or
21 whatever and I don't either. But it's, it's just the --
22 what's here as to what I've got to deal with.

23 So, I, I can think of, if I had a little more time,
24 probably, you know, 30 or, or more that I've talked to at
25 different times and, and it's a, it's a number of things.

1 A lot of them know Frank and they don't want to get
2 involved with it. Other ones are -- I just, I just -- it's
3 just pretty much that they know each other and I've had
4 Frank talk people out of it. I've seen him get involved
5 with it and he's had several of them went up 10, I don't
6 know, 10, 15,000 on a retainer to get their services.

7 And there was a lot of conversation I think going back
8 and forth just because of the same scenario seemed to
9 appear. And I've had attorneys tell me what Frank said and,
10 and such and it made it very difficult to secure
11 representation at all cause a lot of them just said no, they
12 didn't want to get involved with it. Some said, like I
13 said, considerably more money.

14 They might have a 10 or \$15,000 retainer already and
15 then wanted another 5, 10, 15,000 more added to it. And one
16 guy just told me, after I talked to him, and he said that --
17 he, he -- I told, I told each and every one of them if they
18 wanted to contact Frank, I'm, I'm not gonna say no but
19 the -- well, he just said well, 25,000 to start with.

20 THE COURT: Yeah.

21 MR. HENSON: Another guy said do you have a hundred
22 grand, you know, to, to start this thing.

23 So, it was a -- it was then -- I, I feel like it was
24 interference that, you know, trying to keep me from doing
25 it. I'd talk to some and they'd listen to the whole story

1 and they say well, Frank's -- you know, I went to school
2 with Frank, you know, and -- or they'll let me call Frank
3 and then, then it would be next.

4 So, it's been a number of people that I've talked to
5 and I've tried desperately. I have talked to people this
6 week -- this past week. I had Mrs. Page, Jourdan Page, and
7 Frank had told me twice that he was gonna quit, that the
8 firm didn't want him to work on it as such. He never told
9 me he was a partner. The first time I heard that was when
10 Mr. Nettles told me in a deposition. And then I don't know
11 when he's become one or if he's always been one. I, I don't
12 know. He never said.

13 But Jourdan Page came in and I talked to her because
14 Mr. Blanchard was gonna get off of the case. And I asked
15 her, I said, would you be interested in it. She said yes
16 and so she did some study. I know she called Mr. Blanchard,
17 Blanchard and talked to him and he, he talked to her for a,
18 for a I think an hour or more. Something like an hour. And
19 she -- when I talked to her the next time, she told me that
20 he was -- he said he was still in charge of that case and he
21 wasn't going anywhere.

22 THE COURT: Okay. Well, Mr. Henson, I don't mean to
23 interrupt but it sounds to me like you have not been able to
24 get anybody in a good while and, and it doesn't appear, from
25 what your -- you've told me, that you're gonna be -- likely

1 to be able to get one.

2 MR. HENSON: I think it's pretty -- I mean even
3 yesterday, like I said, I, I talked to an attorney that's --
4 that may be of assistance as well. So, I talked to another
5 one a few days before that.

6 I -- I've got another one offered that to, to help me
7 but he's not -- I mean it's not his expertise and I, and I
8 could go back to him at this point and ask him to, to help
9 me --

10 THE COURT: Okay.

11 MR. HENSON: -- if he would.

12 THE COURT: All right. Well --

13 MR. HENSON: After I -- if, if I don't -- I feel like
14 if I don't get a jury trial I'm not gonna have a chance --

15 THE COURT: Okay. Okay. And what you wanting a
16 jury---

17 MR. HENSON: -- in this case.

18 THE COURT: And you want a jury trial, right?

19 MR. HENSON: Well, Your Honor, unless that's suicide.

20 I know -- I don't -- I mean I don't know the difference
21 really what I'm saying but I think -- I want to go to a jury
22 trial and have a chance to get this stuff in order. There's
23 so much information that I want to submit and it takes a
24 long time to research it. You asked me about the, the
25 documents.

1 If I can elaborate just a little bit on, on some of the
2 --?

3 THE COURT: well, before, before you start elaborating
4 on that, if you don't mind, what I'm gonna do is I -- this
5 is the plaintiff's motions. I'm gonna let him -- I'm gonna
6 hear from him about the motions and then I'll let you
7 respond to that and then I'll tell you what I'm gonna do
8 after that.

9 okay?

10 MR. HENSON: All right. Yes, sir.

11 THE COURT: All right. Mr. Nettles, I, I'll be glad---

12 MR. NETTLES: Yes, sir.

13 THE COURT: ---to hear from you. This is
14 2020-CP-18-02003, Rosen Hagood, LLC versus Albert T. Henson.
15 There's a motion to compel discovery and another motion for
16 summary judgment.

17 Is that correct?

18 MR. NETTLES: Yes, sir, I'd like to ask if we could
19 reverse the order there. If the Court is to grant the
20 plaintiff a summary judgment, then the motion to compel
21 discovery's moot. If it---

22 THE COURT: Okay.

23 MR. NETTLES: ---were denied, we do have other
24 discovery to be done.

25 THE COURT: Okay.

1 MR. NETTLES: You, about six weeks ago, and you allowed
2 him to have time. He did give us a few pieces of
3 information, but he said he has more, and he hasn't given it
4 to us. But I, I don't want to get into the motion to compel
5 discovery if -- depending on what the Court rules on our
6 summary judgment motion.

7 THE COURT: Okay.

8 MR. NETTLES: So, if I might?

9 This is an action for unpaid legal fees. Mr. Henson
10 was involved in litigation in Probate Court over the trust
11 created by his grandmother and the opposing parties were his
12 two brothers. Frank Blanchard and the Rosen Hagood firm
13 represented Mr. Henson for a few years and finally Frank
14 Blanchard was relieved by the probate judge back in
15 November, 2019. At that time there was \$161,671.96 of
16 unpaid legal bills for services rendered.

17 In the defendant's answer, he says he, he wasn't happy
18 with the work they did for him and he did -- he thought they
19 were biased or that they were too cozy with opposing
20 counsel. He also raises Statute of Limitations. But it,
21 it -- it just doesn't happen.

22 I mean he was relieved as counsel in November, 2019.
23 This lawsuit was filed for unpaid fees in December, 2020.

24 In his deposition, the defendant -- and I gave the
25 Court copies of the deposition pages along with our motion

1 for summary judgment. He admitted that he had a, a contract
2 for representation with Rosen Hagood. He also admitted that
3 the cont -- the contract says that he agreed to pay legal
4 fees whatever the income would be -- the outcome would be.
5 In other words, this is not a contingency fee.

6 The defendant, if he was not happy with the legal
7 services rendered by the plaintiff, he had a right to
8 terminate the attorney/client relationship at anytime with
9 or without cost and he admitted in his deposition that he
10 never terminated Rosen Hagood.

11 I asked him in the deposition, on Page 39 and 40, do
12 you admit you owe money and -- or how much. Do you deny and
13 he said I don't know. The affidavit of our -- Attorney
14 Frank Blanchard just set forth what he did, what the
15 contract said, what the legal things are -- the legal
16 charges are all about.

17 We are also asking for interest on the unpaid fees.
18 The contract provides for that. A copy of the contract is
19 attached to Frank's affidavit.

20 We're also asking for attorney's fees and court costs
21 and I have calculated all those. The interest, since the
22 last bill was sent or 30 days after the last bill was sent
23 to Mr. Henson, is that principal balance of 161,671.96.
24 Interest at the statutory rate of 8.75 percent, because this
25 is a liquidated claim, and the interest is simple interest,

1 it's not compounded, \$57,083.46 and---

2 THE COURT: Hold -- 57,000 what?

3 MR. NETTLES: \$83.46. That's just 8.75 percent per
4 annum on---

5 THE COURT: Okay.

6 MR. NETTLES: ---the numbers of years its been.

7 THE COURT: Right.

8 MR. NETTLES: I kept my attorney's time and I have an
9 affidavit which I will hand up to the Court today or I'll
10 file it electronically later today and---

11 THE COURT: All right.

12 MR. NETTLES: ---it gives all of the times that I have
13 spent in this lawsuit, which includes depositions and
14 discovery, and we did a five hour mediation about three or
15 four weeks ago. We also have costs for the deposition and
16 for the mediator, \$1,904.00.

17 So we're moving for summary judgment today for
18 \$243,324.31 and those are liquidated. The defendant, I will
19 say this, in his affidavit, he sent me an affidavit by email
20 yesterday afternoon and I, I assume he got it filed. I
21 think it was clocked in around 5:02 here in the Court.

22 But Rule 56(c) says if he's gonna put in an affidavit,
23 it has to be two days prior to the hearing and he did not do
24 that. I don't know that the Court has a notarized affidavit
25 from the defendant at all. And when you look -- if the, the

1 Court wants to go ahead and look at it despite his
2 noncompliance with the rules, he says I'm not happy with the
3 results in this case. I lost confidence in my client.

4 But he could have terminated the plaintiff law firm
5 anytime he wanted to under the contract and he didn't do
6 that and I would -- and the last thing I want to say, judge,
7 it may be that he has talked to several attorneys and they
8 look at the facts of the case and they say sorry, we --
9 there's really not anything we can do for you because, you
10 know, you got a settlement in the probate case on his
11 grandmother's trust. He got a third and each of his two
12 brothers got a third and that case is over and it is not
13 been appealed. And now he doesn't want to pay the
14 attorney's fees that accrued, that accrued over two and a
15 half years of litigation.

16 So, we move for a summary judgment. There's no -- he
17 has not raised a material fact. Certainly not a question of
18 law.

19 Thank you, Your Honor.

20 THE COURT: Thank you, sir.

21 Mr. Henson, I'll be happy to hear from you in response.

22 MR. HENSON: All right, sir. I feel like there is a
23 material situation here.

24 I, I do believe there's very serious things that have
25 happened and, and went on during the course of time. And

1 when -- Mr. Blanchard, we had a, a three week call with the,
2 with the judges up here and, and with opposing counsel. And
3 I asked him if I could sit in because I'd lost confidence.
4 I was worried about what he was gonna say or do.

5 And I told him, I said, I won't interrupt. I won't
6 even say a word. I'll just listen and I did. But he did
7 what I asked him to do and the judge went along with it.
8 But he told me that it was no way and, and, you know, he
9 just wasn't gonna do anything with it. And I told him I
10 said, Frank, would you please do this and he said --
11 reluctantly he did and it, and it went fine. It went real
12 good. Everything we could ask for at that point.

13 And he told me, he said what are you a spy and I said a
14 spy. I said it's common sense. I said this is in my best
15 interest just like so many other things.

16 The cc -- we had a situation with a lender and Frank
17 was allowing the other side just to beat me up all the time
18 with stuff that wasn't factually true and I told him, I
19 said, Frank, this is not accurate. What is wrong.

20 Well, eventually they were marking me about the amount
21 of interest on a loan that was -- that I got to, to save the
22 property and nobody else paid anything. Nobody else did
23 anything and I'm the only one that could get that large a
24 sum of money that quickly. So, I did it and whatnot.

25 So they then balked to me and the other attorney's been

1 telling other attorneys I've tried to get the same thing and
2 I've straightened one of them out on the details cause he
3 had them wrong and Mr. Baker was telling him incorrectly.

4 This is -- this kind of upset and interference. This
5 is almost more than anybody could believe to be honest with
6 you.

7 I told him that, that I would like for him to do it.
8 He did it and it worked perfectly. But, after that, we were
9 walking out of his office and we put some files, the notes
10 that he had taken down. I've requested those from
11 Mr. Nettles and whatnot and now I realize I haven't done it
12 in writing. But I asked he and Frank, when we were at the
13 deposition, for those records outside of his office.

14 The other -- another part of this thing was the -- and
15 I jump around sometimes and I'm sorry. I just can't do any
16 better I don't think.

17 But let me go back to in the office. When I came out
18 of his office, and I listened to what the judge had to say,
19 and, and it was -- and it worked perfect.

20 When we left out, we put some papers in the file
21 cabinet he had right outside of his office and we were
22 walking out. I said Frank, what in the heck is going on.
23 This is obviously in my best interest and he said, and he
24 said -- he whispered it too. He said Al, Barry Baker is my
25 boss's best friend and I mean I was like my -- I mean it's

1 just I like stopped in my tracks.

2 I said I can't even believe he told me that something
3 like that and, and then -- but he did. He said that that
4 was his boss's best friend. I said you've got to be joking
5 me. I said you're not doing what's in my best interest.

6 So, I tried to get other counsel as hard as I could but
7 then there was -- all of them around Broad Street, and
8 Meeting, and whatnot, they're gonna get in touch with them
9 because nobody wants to go against another attorney like
10 that. So you got to get somebody out of town I guess.

11 I, I don't know. I have talked to some. It looks
12 promising and more promising than anything I've had in a
13 while now. But I -- Your Honor, can, can Ms. Buxton speak a
14 minute?

15 THE COURT: Is she an attorney?

16 MR. HENSON: No, sir.

17 THE COURT: What, what would she -- I, I -- and tell me
18 what would she add to this conversation?

19 I'm just kind of curious.

20 MR. HENSON: She knows the details probably better than
21 I do. She went to a lot of the -- most of the meetings with
22 Frank and Frank would kind of mark it, you know. You don't
23 want to come here and he did that the other day. It's
24 negotiations we had like Al, (indiscernible) you're here.

25 That, that -- I want somebody to verify what the hangs

1 been going on in there. Like on one occasion Frank, he
2 kept, he kept telling me to, to -- I, I didn't have to make
3 the payments on my mother's house because they'd gone past
4 three years. I said Frank, first off, I don't think they
5 did anything wrong at the bank. I don't, I don't see where
6 they -- there's any reason to do something like that and I
7 said I don't know if that's right or not.

8 I said I thought about that three year, year rule but I
9 don't think it applies. And Frank told me that for a year
10 or two, every time we'd get together at a meeting. And then
11 finally we questioned him one day and said Frank, we don't
12 know about that. That's just -- it was scary to me to do
13 something like that.

14 And he went in there and he looked in a law book he's
15 got back there, kind of a small one, a couple inches thick,
16 and he flipped through it and said no, you can't do that. I
17 said Frank, you're scaring me with this stuff.

18 The long story short, we tried every way possible. I
19 think we've got somebody. But, you know, Your Honor, until
20 you got them in the bag you don't know.

21 Now if---

22 THE COURT: Amen.

23 MR. HENSON: If she can speak, she, she typed some of
24 this stuff. I did some things as well, and, and if she can
25 speak, she understands the, you know, what's written

1 probably better than I do.

2 THE COURT: Well---

3 MR. HENSON: And let me, let me -- and the, and the
4 files, the files that they were talking about. I've asked
5 for the files from, from these guys and, and I don't guess,
6 unless I send it certified or something, I'm gonna get them.

7 But there was some important notes that we took in his
8 office and out -- and, and he kept putting them in there and
9 it wasn't part of it. But we had Court -- the, the
10 documents, that's in big boxes, a lot of it, and---

11 THE COURT: Well---

12 MR. HENSON: ---when I -- when Frank pulled out, I
13 asked him if I could have my, my records for the other
14 attorneys I'd be talking to. He wouldn't give them to me.

15 I said well, Frank, I said, I can't get another
16 attorney without these documents and I said they're gonna
17 have to see them and he said no and it -- a period of time
18 went on and then, finally, I, I asked him, I said, Frank, I
19 need those records horrible bad.

20 I said -- well, I said I'll pay for a copy to be made
21 if you'll let me take them down there or if they can come
22 pick it up or if I have to pay for a courier or whatever I
23 want these records. I need these records. And he said, he
24 said we can't do that.

25 And so it went on for a -- some period of time and I

1 said, look, Frank, there's no reason why we can't get this
2 done. I said I got to have them. They're my records. I
3 need them. Well, Frank, he didn't give them to me. But he
4 did let me make a copy of them and he kept the other set.

5 Now, he had all the records all this time for a very
6 long period of time and he didn't seem to want any of them.
7 So, he calls me and he said I want you to come get these
8 records out of here. I said all right, all right, Your
9 Honor, do you -- I mean, I mean I'm sorry, Your Honor.

10 I said Frank, I said so you're gonna let me have them
11 now after I spent several thousand dollars getting these
12 things copied and he said yeah, we don't want them and
13 whatnot.

14 THE COURT: All right. Well, Mr. Henson, let me, let
15 me just ask you a question. I'm, I'm just gonna ask you a
16 question.

17 Did you, did you see the bill that you received from
18 Rosen Hagood from, from Mr. Blanchard?

19 MR. HENSON: Yes, sir.

20 THE COURT: Did you review that?
21 Sir?

22 MR. HENSON: Sir?

23 THE COURT: Did you review that bill?

24 MR. HENSON: Yes, sir, I did at the time.

25 THE COURT: Okay. Do you recall anything on that bill

1 that was inaccurate?

2 MR. HENSON: I think a lot of times we'd go into the --
3 we'd go into -- have a meeting with Frank and he bring up
4 the same stuff and I couldn't get to the things I wanted to
5 like my mother's bank records and whatnot that proved what I
6 was saying.

7 Anything that would prove me right, and the other side
8 wrong, if it was anything material, he just didn't want to
9 mess with it and it's -- it just sound crazy but that's what
10 was going on and it's driving me up the wall.

11 THE COURT: Okay. All right. All right. Thank you.
12 Thank you, Mr. Henson.

13 MR. HENSON: Can, can Ms. Sara talk now?

14 THE COURT: She -- she's really not a party to the
15 action and she's---

16 MR. HENSON: She's knows---

17 THE COURT: Huh?

18 MR. HENSON: She knows the -- she knows all the
19 different workings better than I do.

20 THE COURT: Yeah. Well -- and, and I'm not really
21 denying that. I don't know but she---

22 MR. HENSON: Okay.

23 THE COURT: She's not a party. So, she's not, not
24 gonna be able to say anything.

25 Okay. All right. Mr. Nettles, anything you would like

1 to add or reply?

2 MR. NETTLES: If Your Court wants to read the pages of
3 the deposition of Mr. Henson that I gave you --

4 THE COURT: Uh-huh. (Affirmative).

5 MR. NETTLES: -- I asked him what part or if any of
6 this bill do you not owe and he said I don't know.

7 MR. HENSON: Oh.

8 MR. NETTLES: And he admitted to saying that I would
9 pay this fee as according to the contract regardless of the
10 outcome of the case and the case, after we were relieved as
11 attorneys, the case was settled. And it has not been
12 appealed.

13 So, this, this thing is really over.

14 THE COURT: All right. All right.

15 MR. HENSON: Your Honor, I, I did not tell him that.

16 Okay. I -- if, if -- unless I'm just completely out
17 of -- I was very deliriously tired but that's not any reason
18 to made a mis -- made a mistake. I---

19 THE COURT: Yes, sir.

20 MR. HENSON: Anyway, it's just -- I, I, I paid Frank
21 \$26,500 initially. But when I found out that he wasn't
22 doing what was in my best interest, I had a problem with
23 that.

24 We talked about it and, on two occasions, he said he
25 was gonna withdraw and I, I went ahead and looked for

1 counsel both times. And then when I found one, he
2 interfered with that and then, then backed out.

3 I mean it, it -- what are you suppose to do?

4 Now, I talked to several other ones down Broad Street
5 and the same thing and, anyway, let me just say this---

6 MR. NETTLES: I would just like to point out to the
7 Court that---

8 MR. HENSON: Wait. I want to finish this.

9 MR. NETTLES: ---Ms. Buxton is writing things on a
10 paper and giving him to, to Mr. Henson to read to you.

11 MR. HENSON: All right.

12 MR. NETTLES: I just think that's improper.

13 MR. HENSON: Well, we'll -- let me ask you one thing
14 about proper.

15 The last time when we had the Zoom hearing and you're
16 talking to our judge here, and I'm not privy to anything,
17 and you're talking before the thing started, it seems like
18 that's not exactly right either because I was listening to
19 y'all talk. Y'all couldn't see me.

20 So, all I'm saying is that, you know, I don't think
21 that that's real kosher either doggonit. You shouldn't have
22 been talking to him about the details of this doggone case
23 in that kind of circumstance.

24 MR. NETTLES: The judge knows that I don't talk to him
25 ex parte about the merits of the case.

1 MR. HENSON: You -- well, you---

2 MR. NETTLES: And he wouldn't do it anyway.

3 MR. HENSON: well, you took -- I don't -- I didn't say
4 he would do it. I'm saying that you---

5 THE OFFICER: Sir. Sir.

6 THE COURT: Okay. Gentlemen, whoa, whoa.

7 THE OFFICER: Whoa.

8 THE COURT: Mr. Henson?

9 MR. HENSON: Yes, sir.

10 THE COURT: Okay. Let me tell you what I'm gonna do.
11 okay?

12 MR. HENSON: All right, sir.

13 THE COURT: Y'all, y'all submitted stuff for me to look
14 at. I'm gonna read the stuff that I've got on the summary
15 judgment motion, okay, and then I'm gonna rule on that.

16 That will either take care of the motion to compel or
17 you will come back for the motion to compel. But I've heard
18 all I'm gonna hear right now.

19 okay?

20 MR. HENSON: All right, sir.

21 THE COURT: All right.

22 MR. HENSON: I didn't really fully understand what you
23 told me.

24 THE COURT: Okay. well, what, what I'm gonna do is I'm
25 going to -- y'all have -- Mr. Nettles has argued the summary

1 judgment motion. You've told me the reason that you didn't
2 like Ms. Blanchard's services. I'm going to read through
3 the file and make a decision on the summary judgment motion.

4 MR. HENSON: Yes, sir.

5 THE COURT: Depending on how I rule on that, it can
6 affect whether y'all will have to come back on the motion to
7 compel or not.

8 Okay?

9 MR. HENSON: I got a lot more---

10 THE COURT: Thank you.

11 MR. HENSON: ---I wanted to share, Your Honor.

12 THE COURT: I -- and I appreciate that.

13 Okay. Thank y'all.

14 MR. HENSON: Thank you so much.

15 MR. NETTLES: Thank you, Your Honor.

16 THE COURT: Yes, sir.

17 MR. HENSON: And, and congratulations. I just wanted
18 to tell---

19 THE COURT: Thank you, sir.

20

21 * * *END OF REQUESTED TRANSCRIPT OF RECORD* * *

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C E R T I F I C A T E

I, Pamela E. Green, Official Court Reporter for the State of South Carolina, do hereby certify that the foregoing is a true, accurate and complete Transcript of Record of the proceedings had and evidence introduced in the trial of the captioned case, relative to appeal, in the Court of Common Pleas Nonjury for Dorchester County, South Carolina, on the 1st day of June, 2022.

I do further certify that I am neither of kin, counsel nor interest to any party hereto.

October 26th, 2022



PAMELA E. GREEN, Court Reporter

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2020-CP-18-2003
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	PLAINTIFF'S REQUEST TO
	)	ADMIT THE GENUINENESS OF
vs.	)	DOCUMENTS TO DEFENDANT
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
	)	

TO: ALBERT T. HENSON, JR., DEFENDANT:

Pursuant to Rule 36 of the South Carolina Rules of Civil Procedure, the Plaintiff hereby requests that the Defendant to admit as to the genuineness and authenticity of the document attached hereto and listed below:

1. A legal representation agreement dated May 25, 2016 signed by Daniel F. Blanchard, III, on behalf of the Plaintiff and by the Defendant, Albert T. Henson, Jr.

The genuineness and authenticity of this document will be admitted unless the Defendant serves upon the below signed counsel a written Answer or Objection addressed to each specific item contained herein. If an objection is made, the reasons therefore shall be stated. If the responding parties deny any of the above requests for admission, such denial must be specific and must fairly meet the substance of the Request for Admissions. If the responding parties cannot admit or deny the matter, for lack of information or any other reason, those parties must set forth in detail the reasons why the responding parties cannot admit or deny the requested admission of fact and, further, set forth what efforts or actions the responding parties have undertaken to obtain the necessary information to meaningfully respond to the requested information.

In the case of a failure to admit or denial of a request for admission, if the requesting party thereafter proves the genuineness of the document or truth of the requested fact, the requesting party will apply to the trial court for the expenses incurred by that party, including attorney's fees, in the proof of such document or fact pursuant to Rule 37 (c) of the Federal Rules of Civil Procedure.

A handwritten signature in blue ink, appearing to read "F. Truett Nettles, II", is written over a horizontal line.

F. Truett Nettles, II, Esq.
Rosen Hagood, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
(843) 577-6726
(843) 724-8036 (fax)
tnettles@rosenhagood.com

Attorney for the Plaintiff

February 12, 2021
Charleston, South Carolina

May 25, 2016

Mr. Albert T. Henson, Jr.
148 Pelzer Drive
Summerville, SC 29485

Re: Estate of Ann Page Henson Pittillo and Trust of Eunice I. Page

Dear Al:

We are pleased to have the opportunity to be of service to you in the above matter. We look forward to working with you and will do our best to provide the highest quality legal services in a responsive, efficient manner.

Fundamental to a sound relationship is a clear understanding of the terms and conditions upon which we will be providing legal services. Accordingly, the purpose of this letter is to clarify and confirm these terms and conditions.

Scope of Services. You have asked us to represent you in defending you individually and/or in your capacity as personal representative of the Estate of Ann Page Henson Pittillo against claims being pursued in the Dorchester County Probate Court by Richard S. Henson and Vann K. Henson involving the Estate of Ann Page Henson Pittillo and the Trust of Eunice I. Page, including claims alleging that the will of Ann Page Henson Pittillo is invalid and claims alleging that the Trust of Eunice I. Page is the owner of certain real property located at 605 N. Main Street, Summerville, South Carolina.

Limitations on Obligation. You acknowledge that we are not your general counsel and that our acceptance of this engagement does not involve an undertaking to represent you in any matter other than that described herein-above.

Additional Services. While this letter is intended to deal with the specific legal services described above, these terms and conditions will also apply to any additional legal services that we may agree to provide that are outside the initial scope of our representation.

Staffing. I will be the attorney primarily responsible for the representation with assistance from other attorneys and paralegals in our practice group as appropriate from time to time. We intend to provide quality legal services in an efficient, economical manner. This sometimes necessitates involving other firm attorneys with the requisite expertise, and paralegals, who are not attorneys but are experienced in the preparation of documents and the completion of various tasks. When questions or comments arise about our services, staffing, billings, or other aspects of our representation, please contact me directly. It is important that you are satisfied with our services and responsiveness at all times.

Mr. Albert T. Henson, Jr.

May 25, 2016

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Responsibilities. In reliance upon information and guidance provided by you, we will provide legal counsel and assistance to you in accordance with this letter, keep you reasonably informed of progress and developments, and respond to your inquiries.

To enable us effectively to render these services, you agree to cooperate fully with us in all matters relating to the preparation and presentation of its case, to fully and accurately disclose to us all facts that may be relevant to the matter or that we may otherwise request, and to keep us apprised of developments relating to the matter. You will also be reasonably available to attend meetings and telephone conferences. In addition, you will be responsible for advising us whether any document we have prepared or received and sent to you for your approval or review reflects the principal terms of your proposed agreement or other expectations, as the case may be.

Either at the beginning or during the course of our representation, we may express our opinions or beliefs concerning the matter or various courses of action and the results that might be anticipated. Any such statement made by any member or employee of our firm is intended to be an expression of opinion only, based on information available to us at the time, and must not be construed by you as a promise, guarantee, or warranty of any particular result. No guarantees are possible in matters such as this.

Fees, Disbursements, and Other Charges. Contemporaneous with its acceptance of this agreement, you agree to deposit with Rosen, Rosen & Hagood, LLC an advance or retainer fee of \$10,000.00, which will be credited towards our fees and expenses in connection with our representation in this matter. The advance will be deposited in our general funds or escrow. We will charge our fees and expenses against the advance and credit them on our billing statements. In the event our fees or expenses exceed the advance deposited with us, we will bill you for the excess. Any unused portion of the deposit will be returned to you at the conclusion of our services.

The representation will be handled on an hourly fee basis and you agree to pay for legal services on an hourly fee basis. Our fees will be based on the amount of time spent by attorneys and paralegals on your matter. Each lawyer and paralegal has an hourly billing rate based generally on his or her experience and any special expertise. The rate multiplied by the time spent on your behalf, measured in tenths of an hour, will be evaluated by the billing attorney as the basis for determining the fee.

My billing rate in this matter will be \$300.00 an hour. Time devoted by our associate attorneys will be at billing rates of \$200.00 an hour and paralegals will be at billing rates of \$125.00 an hour. These rates are adjusted from time to time generally to reflect increased experience and special expertise of the attorneys and paralegals and inflationary cost increases affecting our practice, and the adjusted rates will apply to all services performed thereafter. We will send you advance notification of any adjustment to the billing rates.

Other factors may be considered in determining our fees, including the novelty and

Mr. Albert T. Henson, Jr.

May 25, 2016

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difficulty of the questions involved; the skill requisite to perform the services properly; the experience, reputation, and ability of those performing the services; the time limitations imposed by the client or the circumstances; the amount involved and results obtained; and any other factors that may be relevant under applicable rules of professional conduct. However, these factors will not result in our fees exceeding the indicated amounts based on our hourly rates without prior discussion with you.

In addition to our fees, we will expect payment for disbursements and other charges incurred on your behalf. You authorize us to incur all reasonable costs and to retain any investigators, consultants, or experts necessary in our judgment to investigate, evaluate, or pursue claims in this matter. You agree to promptly pay or reimburse us for all reasonable and necessary disbursements and other charges for investigating, preparing, and presenting your case and will remain responsible for payment or reimbursement of these disbursements and charges whatever may be the ultimate outcome of the matter. Disbursements and charges include fees and expenses of others (such as experts, investigators, witnesses, consultants, and court reporters), photocopying, messenger and delivery service, air freight, computerized research, videotape recording, travel (including mileage, parking, airfare, lodging, meals, and ground transportation), copy charges, record retrieval charges, court costs, filing fees, and other miscellaneous expenses associated with the pursuit of your claims.

Each month we will furnish the client with a statement describing our services rendered and separately showing disbursements and other charges in a format and with such detail as the client and we may agree. There often is an unavoidable delay in reporting disbursements and other charges, and therefore not all disbursements and charges may be billed at the same time as the related legal services. Our monthly statements submitted for our legal services are due upon receipt. If your account becomes delinquent for more than sixty (60) days, we may move to be relieved as counsel. If you fail to pay all amounts owed, then you agree to reimburse us for all costs incurred in collecting these amounts, including reasonable attorney's fees and costs.

Lien. If a monetary judgment or award is made in favor of the client, we shall have a lien on the proceeds to the extent of any unpaid fees, disbursements, or other charges.

Termination of Services. You have the right at any time to terminate our services and representation upon written notice to the firm. Such termination shall not, however, relieve the client of the obligation to pay for all services rendered and disbursements and other charges made or incurred on behalf of the client prior to the date of termination.

We reserve the right to withdraw from our representation with your consent or for good cause. Good cause may include your failure to honor the terms of the engagement letter, your failure to pay amounts billed in a timely manner, your failure to cooperate or follow our advice on a material matter, or any fact or circumstance that would, in our view, impair an effective attorney-client relationship or would render our continuing representation unlawful or unethical. If we elect to do so, you agree to take all steps necessary to free us of any obligation to perform further, including the execution of any documents (including forms for substitution of counsel)

Mr. Albert T. Henson, Jr.

May 25, 2016

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necessary to complete our withdrawal, and we will be entitled to be paid for all services rendered and disbursements and other charges made or incurred on behalf of the client prior to the date of withdrawal.

If you approve of and agree to the terms and conditions of our representation of you as set forth in this letter, please confirm your acceptance of same by signing the enclosed copy in the space provided below and return it to me along with the retainer fee. Upon acceptance, these terms and conditions will apply retroactively to the date we first performed services on your behalf.

This letter will not become effective and we will have no obligation to provide legal services until you sign and return the copy of this letter. We are pleased to have this opportunity to be of service and to work with you.

With best personal regards, I am

Sincerely,

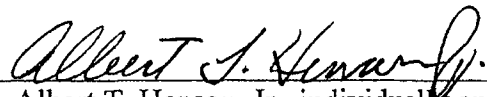
ROSEN, ROSEN & HAGOOD, LLC.



Daniel F. Blanchard, III

I hereby acknowledge and accept the fee arrangement and other terms and conditions as set forth in this letter.

Date: 5-25-16



Mr. Albert T. Henson, Jr., individually and
as personal representative of the Estate of
Ann Page Henson Pittillo

Detail Transaction File List
Rosen Hagood, LLC

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	03/04/2019	LEM	A	125.00	0.20	0.20	25.00	Conference with DFB; t/c with Probate Court	ARCH
9634.000	03/05/2019	LEM	A	125.00	0.10	0.10	12.50	Voicemail from client; email DFB	ARCH
9634.000	10/24/2019	LEM	A	125.00	0.20	0.20	25.00	Conference with Frank Blanchard; email Dorchester County Probate Court	ARCH
9634.000	11/06/2019	LEM	A	125.00	0.30	0.30	37.50	E-mails with Frank Blanchard; call client; t/c with client	ARCH
9634.000	11/21/2019	LEM	A	125.00	0.20	0.20	25.00	Voicemail from client; confer with Frank Blanchard; t/c with client	ARCH
9634.000	12/10/2019	LEM	A	125.00	0.20	0.20	25.00	Telephone call with ProCopy; confer with Frank Blanchard; email ProCopy	ARCH
Subtotal for Timekeeper LE									
				Billable	1.20	1.20	150.00	L. Ensley Mahoney	
9634.000	05/13/2016	DFB	A	300.00	0.80	0.80	240.00	Telephone conference with Al Henson; Review memoranda from Wooten and Hill re case summary (re Al Henson)	ARCH
9634.000	05/17/2016	DFB	A	300.00	3.30	3.30	990.00	Conference with Al Henson (re Al Henson)	ARCH
9634.000	05/18/2016	DFB	A	300.00	0.10	0.10	30.00	Telephone conference with Jimmie Reeves (message) (re Al Henson)	ARCH
9634.000	05/19/2016	DFB	A	300.00	1.00	1.00	300.00	Telephone conference with Al Henson (2x); PC with Jimmie Reeves (message); PC with J. Reeves (re Al Henson)	ARCH
9634.000	05/23/2016	DFB	A	300.00	0.20	0.20	60.00	Telephone conference with Al Henson (re Al Henson)	ARCH
9634.000	05/24/2016	DFB	A	300.00	1.00	1.00	300.00	Telephone conference with Al Henson (re Al Henson)	ARCH
9634.000	05/25/2016	DFB	A	350.00	0.50	0.50	175.00	Conference with Al Henson	ARCH
9634.000	05/26/2016	DFB	A	350.00	1.20	1.20	420.00	Telephone conference with Al Henson; Prepare LT Jimmy Reeves requesting file; Prepare email to J. Reeves; Prepare letters to Judge Blunt re notices of appearance in both cases; Prepare notices of appearance for both cases	ARCH
9634.000	05/27/2016	DFB	A	350.00	1.00	1.00	350.00	Receipt/review payment receipt and other documents from Al Henson; PC with Barry Baker; PC with Trudy Robertson (voicemail); Prepare LT Judge Blunt re postponement of hearing; PC with Judge Blunt's assistant (Melissa Burns)	ARCH
9634.000	05/31/2016	DFB	A	350.00	0.10	0.10	35.00	Telephone conference with probate court re hearing date	ARCH
9634.000	05/31/2016	DFB	A				2.35	Postage to date	ARCH
9634.000	06/02/2016	DFB	A	350.00	0.80	0.80	280.00	Receipt/review voice mail from Gail in probate court; PC with Gail in probate court; Prepare motion for continuance of hearing; Prepare proposed order; Prepare LT Judge	ARCH

ROA 0093

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							Blunt	
9634.000	06/02/2016	DFB	A	0.220			6.60 In house photocopies/scans to date	ARCH
9634.000	06/06/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review LF Trudy Robertson	ARCH
9634.000	06/07/2016	DFB	A	300.00	0.90	0.90	270.00 Receipt/review LF B. Baker; PC with Al Henson; Prepare and draft letter to Judge Blunt re continuance of hearing	ARCH
9634.000	06/08/2016	DFB	A	300.00	2.00	2.00	600.00 PC with Melissa Burns in court's office; Email letter to Judge Blunt; Review emails from Judge Edwards; Review emails from Robertson and Baker; PC with Judge Edwards and other counsel re request for continuance of hearing; PC with Al Henson; PC with Jimmie Reeves; Review LF Trudy Robertson	ARCH
9634.000	06/08/2016	DFB	A	0.220			6.60 In house photocopies/scans to date	ARCH
9634.000	06/13/2016	DFB	A	300.00	1.20	1.20	360.00 Revise and execute subpoenas for Scott and Ken Henson to attend hearing; Revise and sign letter to T. Robertson; Review files from Jimmy Reeves; Review emails from T. Robertson	ARCH
9634.000	06/13/2016	DFB	A	0.220			4.62 In house photocopies/scans to date	ARCH
9634.000	06/14/2016	DFB	A	300.00	0.40	0.40	120.00 Telephone conference with Al Henson; Prepare email to Jimmy Reeves; Review email from Reeves; Review email from T. Robertson; Prepare email to Robertson	ARCH
9634.000	06/14/2016	DFB	A	0.220			233.64 In house photocopies/scans to date -	ARCH
9634.000	06/15/2016	DFB	A	300.00	3.00	3.00	900.00 Prepare and draft affidavit for Al Henson; Review documents from Jimmy Reeves' file to prepare affidavit; Review email from Barry Baker's office	ARCH
9634.000	06/16/2016	DFB	A	300.00	6.00	6.00	1,800.00 Conference with Al Henson re affidavit, hearing, etc.; Prepare and revise Al Henson affidavit; PC with Al Henson; PC with Jim Wright; Prepare affidavit for Jim Wright; Prepare email to Jim Wright; Review email from Wright; Prepare email to Jimmy Reeves; Review email from Reeves; Legal research and preparation of memorandum of law in opposition to petitioners' motion for appointment of special fiduciary	ARCH
9634.000	06/16/2016	DFB	A				48.91 ProLegal, Invoice #CHS143939	ARCH
9634.000	06/16/2016	DFB	A	0.220			205.70 06/15/2016, Outside copy charges (Frank Blanchard)	ARCH
9634.000	06/17/2016	DFB	A	300.00	7.00	7.00	2,100.00 In house photocopies/scans to date - (No charge)	ARCH
							Conference with Al Henson at office;	ARCH

ROA 0094

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							PC with Roxie Wright; Review VM from Roxie Wright; PC with Sharon Burbage (voicemail); PC with Sharon Burbage (2X); Travel to/from Summerville to meet with Jim Wright; Meeting with Jim Wright, Al Henson, and Sally Buxton; Prepare affidavit for Sharon Burbage; Prepare affidavit for Mr. Lee; Prepare and revise memorandum of law in opposition to Petitioners' motion for interim trustee; Prepare email to T. Robertson re mediation date	
9634.000	06/20/2016	DFB	A	300.00	1.50	1.50	450.00 Telephone conference with Sharon Burbage; PC with Al Henson; Revise/update memorandum in opposition to petitioners' motion for appointment of interim trustee; Review voice mail from A. Henson; Prepare letter to attorney Kirk; Review email from Barry	ARCH
9634.000	06/20/2016	DFB	A	0.220			2.64 In house photocopies/scans to date	ARCH
9634.000	06/24/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review emails from Barry Baker and his assistant	ARCH
9634.000	06/24/2016	DFB	A	0.220			114.40 In house photocopies/scans to date - (No charge)	ARCH
9634.000	06/27/2016	DFB	A	300.00	7.00	7.00	2,100.00 Conference with Al Henson and Sally Buxton to prepare for hearing, etc.; Revise affidavit of Al Henson; Prepare affidavits for Kane Wright, David Whitfield, and Glenn Little; Revise affidavit for Lee Agnew; Prepare for hearing; Review email from T. Robertson; Prepare email to Judge M. Edwards with attachments; Prepare and finalize memorandum in opposition to motion for appointment of special fiduciary	ARCH
9634.000	06/27/2016	DFB	A	0.220			9.02 In house photocopies/scans to date	ARCH
9634.000	06/28/2016	DFB	A	300.00	5.50	5.50	1,650.00 Prepare for motion hearing; Prepare potential exhibits; PC with Al Henson; Prepare outline/questions for hearing	ARCH
9634.000	06/28/2016	DFB	A	0.540			27.32 Tyler Malone, 06/17/2016, Reimbursement for mileage to 400 N Cedar Street in Summerville, SC for pick up on 06/09/2016 (Frank Blanchard)	ARCH
9634.000	06/28/2016	DFB	A	0.540			33.70 Tyler Malone, 06/24/2016, Reimbursement for mileage to 3258 West 5th North Street for affidavit on 06/22/2016 (Frank Blanchard)	ARCH
9634.000	06/28/2016	DFB	A	0.220			57.64 In house photocopies/scans to date	ARCH
9634.000	06/28/2016	DFB	A	0.500			16.00 In house color photocopies to date	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	06/29/2016	DFB	A	300.00	7.00	7.00	2,100.00	Receipt/review reply memorandum filed by Trudy Robertson; Review cases cited by Robertson in reply memorandum; Legal research for cases to respond to T. Robertson's arguments re Dead Mans Statute, hearsay rule, and consideration of motion based solely on pleadings; Revise outline for hearing; Travel to/from hearing in St. George; Attend hearing before Judge M. Edwards; Conf with client	ARCH
9634.000	06/30/2016	DFB	A	300.00	0.60	0.60	180.00	Receipt/review emails from T. Robertson and Butch Watson; Prepare email to Watson re mediation; Prepare LT client; Conf with law clerk (Caroline Myers) re legal research assignment involving Dead Man's Statute	ARCH
9634.000	06/30/2016	DFB	A	0.220			11.44	In house photocopies/scans to date	ARCH
9634.000	06/30/2016	DFB	A				10.25	Postage to date	ARCH
9634.000	07/05/2016	DFB	A	300.00	1.00	1.00	300.00	Telephone conferences with Francis Kirk (2x); Review voice message from F. Kirk; Conf with Caroline Myers re research involving Dead Mans statute; Review cases on Dead Man's statute; Prepare LT Judge M. Edwards re case law on Dead Man's statute	ARCH
9634.000	07/05/2016	DFB	A	0.220			2.20	In house photocopies/scans to date	ARCH
9634.000	07/05/2016	DFB	A	0.500			37.50	In house color photocopies to date	ARCH
9634.000	07/06/2016	DFB	A	300.00	0.30	0.30	90.00	Receipt/review email from T. Robertson to Judge Edwards and plaintiffs' supplemental reply brief	ARCH
9634.000	07/07/2016	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from T. Robertson	ARCH
9634.000	07/14/2016	DFB	A				235.00	McCarn Reporting Inc, 07/10/2016 Invoice #6968, Transcript of Hearing on 06/29/2016 (Frank Blanchard)	ARCH
9634.000	07/21/2016	DFB	A	300.00	2.50	2.50	750.00	Prepare letter to mediator (Robert Watson) re issues for mediation, etc.; Prepare email to Watson; Prepare materials to send to Watson for review before mediation; Prepare for mediation	ARCH
9634.000	07/21/2016	DFB	A	0.220			14.74	In house photocopies/scans to date	ARCH
9634.000	07/22/2016	DFB	A	300.00	0.10	0.10	30.00	Receipt/review voice message from Henson; PC with A. Henson (voicebox full)	ARCH
9634.000	07/25/2016	DFB	A	300.00	7.50	7.50	2,250.00	Prepare for mediation; Conf with client; Attend mediation at Moore & Van Allen	ARCH
9634.000	07/26/2016	DFB	A	300.00	0.10	0.10	30.00	Receipt/review emails from T. Robertson; Review email from Judge Blunt	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	07/27/2016	DFB	A	300.00	1.20	1.20	360.00	Receipt/review voicemail from Al Henson; PC with Henson; Conf with Henson and Buxton	ARCH
9634.000	07/29/2016	DFB	A				61.59	West Payment Center, Invoice #834310529 07/01/2016, Computer research for June 2016 (Frank Blanchard)	ARCH
9634.000	07/29/2016	DFB	A				13.92	Postage to date	ARCH
9634.000	08/02/2016	DFB	A	300.00	0.20	0.20	60.00	Receipt/review voicemail from Al Henson; PC with Al Henson	ARCH
9634.000	08/02/2016	DFB	A				800.00	Robert E. Watson, 07/29/2016, Share of Mediation Fees (Frank Blanchard)	ARCH
9634.000	08/02/2016	DFB	A	0.220			0.22	In house photocopies/scans to date	ARCH
9634.000	08/03/2016	DFB	A	300.00	1.20	1.20	360.00	Conference with Al Henson and Sally Buxton; PC with Al Henson; Review LF Barry Baker re discovery responses	ARCH
9634.000	08/04/2016	DFB	A	300.00	1.00	1.00	300.00	Receipt/review voicemails from Al Henson; PC with Henson; Prepare and draft assignment of note/mortgage	ARCH
9634.000	08/05/2016	DFB	A	0.540			27.00	Tyler Malone, 08/04/2016, Reimbursement for mileage to 400 N Cedar Street in Summerville for delivery on 07/28/2016 (Frank Blanchard)	ARCH
9634.000	08/11/2016	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from Barry Baker; Prepare email to Baker	ARCH
9634.000	08/17/2016	DFB	A				121.86	West Payment Center, Invoice #834497196 08/01/2016, Computer research July 2016 (Frank Blanchard)	ARCH
9634.000	08/25/2016	DFB	A	300.00	2.00	2.00	600.00	Prepare responses to petitioners' interrogatories and requests for production of documents; Review files and documents to prepare responses; Review medical records from Trident Hospital produced by petitioners	ARCH
9634.000	08/26/2016	DFB	A	300.00	3.50	3.50	1,050.00	Telephone conference with Al Henson; Revise responses to petitioners' interrogatories and requests for production of documents; Prepare email to Baker; Prepare documents for production to petitioners	ARCH
9634.000	08/26/2016	DFB	A	0.220			0.66	In house photocopies/scans to date	ARCH
9634.000	08/27/2016	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from Barry Baker	ARCH
9634.000	08/31/2016	DFB	A	300.00	0.50	0.50	150.00	Telephone conference with Al Henson; Prepare LT Baker; Finalize responses to interrogatories and requests for production; Prepare email to Baker and other counsel re discovery responses	ARCH
9634.000	08/31/2016	DFB	A				9.12	Postage to date	ARCH
9634.000	08/31/2016	DFB	A	0.220			5.50	In house photocopies/scans to date	ARCH
9634.000	08/31/2016	DFB	A	0.220			13.20	In house photocopies/scans to date	ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount		Ref #
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	09/06/2016	DFB	A	300.00	1.00	1.00	300.00	Receipt/review order from Judge Edwards appointing special trustee; PC with Ashley Andrews; PC with Al Henson; Review emails from A. Andrews; Prepare email to Andrews	ARCH
9634.000	09/06/2016	DFB	A	0.220			5.28	In house photocopies/scans to date	ARCH
9634.000	09/07/2016	DFB	A	300.00	0.70	0.70	210.00	Receipt/review emails from Ashley Andrews; Pull/prepare file documents for transmittal to A. Andrews via email dropbox; Prepare emails to Andrews	ARCH
9634.000	09/09/2016	DFB	A	300.00	1.20	1.20	360.00	Conference with Al Henson and Buxton	ARCH
9634.000	09/13/2016	DFB	A	300.00	1.00	1.00	300.00	Telephone conference with Al Henson; Prepare notice of appeal	ARCH
9634.000	09/15/2016	DFB	A	300.00	1.00	1.00	300.00	Revise and finalize notice of intent to appeal to circuit court; Prepare civil action cover sheet; Prepare certificate of service; Prepare LT Judge Blunt; Prepare LT Circuit Court clerk of court; Review SC Code section on appeal from probate court order to ensure that notice of appeal timely filed	ARCH
9634.000	09/15/2016	DFB	A				150.00	Dorchester County Clerk of Common Pleas, 09/15/2016, Filing Fee - Appeal of Probate Court Order to Circuit Court (Frank Blanchard)	ARCH
9634.000	09/15/2016	DFB	A	0.220			25.52	In house photocopies/scans to date	ARCH
9634.000	09/16/2016	DFB	A	300.00	0.80	0.80	240.00	Telephone conference with Al Henson; Prepare LT Andrews	ARCH
9634.000	09/16/2016	DFB	A	0.220			7.70	In house photocopies/scans to date	ARCH
9634.000	09/19/2016	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from Barry Baker office and deposition notice for Al Henson's deposition	ARCH
9634.000	09/19/2016	DFB	A	0.540			55.51	Tyler Malone, 09/19/2016, Reimbursement for mileage to Dorchester County Courthouse for filing on 09/16/2016 (Frank Blanchard)	ARCH
9634.000	09/21/2016	DFB	A	300.00	0.70	0.70	210.00	Telephone conferences with Al Henson (2x)	ARCH
9634.000	09/22/2016	DFB	A	300.00	3.50	3.50	1,050.00	Telephone conference with Al Henson; Prepare amended answer and counterclaims in estate case; Prepare supplemental answers to interrogatories in the trust case; Prepare supplemental answers to interrogatories in the estate case	ARCH
9634.000	09/22/2016	DFB	A	0.220			0.22	In house photocopies/scans to date	ARCH
9634.000	09/26/2016	DFB	A	300.00	1.00	1.00	300.00	Receipt/review voicemails from Al Henson; PC with Al Henson; Legal research re whether Whitfield/Little can refuse payment on note if not made by trustee; Legal research re	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							enforceability of provision in mortgage forfeiting property to creditor if payment default occurs	
9634.000	09/29/2016	DFB	A	300.00	0.30	0.30	90.00 Telephone conference with Al Henson	ARCH
9634.000	09/30/2016	DFB	A	300.00	2.00	2.00	600.00 Conference with Al Henson and Sally Buxton	ARCH
9634.000	09/30/2016	DFB	A				13.14 Postage to date	ARCH
9634.000	10/11/2016	DFB	A	300.00	0.20	0.20	60.00 Receipt/review emails from Baker and Robertson; Prepare email to Robertson	ARCH
9634.000	10/13/2016	DFB	A	300.00	0.90	0.90	270.00 Prepare email to Robertson; Review email from Robertson; Telephone conference with Al Henson; Review VM from Henson	ARCH
9634.000	10/14/2016	DFB	A	300.00	0.70	0.70	210.00 Conf with Al Henson; Prepare email to Robertson and Baker; Review email from Robertson; PC with A. Henson	ARCH
9634.000	10/17/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from Trudy Robertson	ARCH
9634.000	10/21/2016	DFB	A	300.00	2.00	2.00	600.00 Prepare and revise statement of issues on appeal; Review file materials to prepare document; Prepare LT clerk of court; Review email from A. Andrews	ARCH
9634.000	10/21/2016	DFB	A	0.220			7.48 In house photocopies/scans to date	ARCH
9634.000	10/24/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review emails from T. Robertson and B. Baker	ARCH
9634.000	10/25/2016	DFB	A	300.00	0.20	0.20	60.00 Receipt/review email from Baker; PC with Dorchester clerk of court	ARCH
9634.000	10/27/2016	DFB	A	300.00	0.20	0.20	60.00 Receipt/review motion to dismiss appeal from Trudy Robertson; Prepare email to Robertson and Baker	ARCH
9634.000	10/27/2016	DFB	A	0.220			0.66 In house photocopies/scans to date	ARCH
9634.000	10/28/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review motion for expedited hearing from T. Robertson	ARCH
9634.000	10/29/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from Baker	ARCH
9634.000	10/31/2016	DFB	A	300.00	0.50	0.50	150.00 Review Robertson's motion for expedited hearing; LR re appealability of order granting special trustee	ARCH
9634.000	10/31/2016	DFB	A				2.09 Postage to date	ARCH
9634.000	11/01/2016	DFB	A	300.00	0.50	0.50	150.00 Receipt/review email from Baker; Review amended deposition notice from Baker; PC with Al Henson; Prepare email to Baker and Robertson	ARCH
9634.000	11/02/2016	DFB	A	300.00	0.60	0.60	180.00 Telephone conference with Al Henson (VM); PC with Henson; Prepare email to Robertson re depositions	ARCH
9634.000	11/02/2016	DFB	A	0.220			4.62 In house photocopies/scans to date	ARCH
9634.000	11/04/2016	DFB	A	300.00	0.80	0.80	240.00 Receipt/review various emails from clerk of court re hearing; Review emails from Robertson; Prepare emails to Robertson and clerk of court re hearing; PC with Judge	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
								Dickson's law clerk (VM); PC with Dickson's law clerk; Review VM from Dickson's law clerk	
9634.000	11/08/2016	DFB	A	300.00	0.10	0.10	30.00	Receipt/review emails from Judge Dickson's law clerk and T. Robertson	ARCH
9634.000	11/09/2016	DFB	A	300.00	1.70	1.70	510.00	Telephone conferences with Al Henson (X); PC with Jimmy Reeves (message); PC with Reeves (2x); Review VM from Henson (2x); Review VM from Reeves; Prepare email to Robertson; Prepare email to Judge Dickson's law clerk	ARCH
9634.000	11/10/2016	DFB	A	300.00	0.40	0.40	120.00	Telephone conference with Al Henson; Prepare email to Robertson; Review email from Robertson	ARCH
9634.000	11/11/2016	DFB	A	300.00	1.00	1.00	300.00	Prepare memorandum of law in opposition to motion to dismiss appeal	ARCH
9634.000	11/13/2016	DFB	A	300.00	4.50	4.50	1,350.00	Prepare and revise memorandum of law in opposition to motion to dismiss appeal; Legal research	ARCH
9634.000	11/14/2016	DFB	A	300.00	0.10	0.10	30.00	Prepare email to Robertson; Review email from Robertson	ARCH
9634.000	11/17/2016	DFB	A	300.00	6.00	6.00	1,800.00	Prepare and revise memorandum of law opposing motion to dismiss appeal; Prepare email to Judge Dickson; Prepare LT clerk of court; Review VM from Al Henson	ARCH
9634.000	11/17/2016	DFB	A	0.220			17.82	In house photocopies/scans to date	ARCH
9634.000	11/18/2016	DFB	A	300.00	0.50	0.50	150.00	Telephone conferences with Al Henson (2x); Phone conf with Tom Limehouse	ARCH
9634.000	11/21/2016	DFB	A	300.00	5.50	5.50	1,650.00	Prepare for hearing; Prepare motion for stay of briefing schedule; Travel to and from Orangeburg; Hearing before Judge Dickson; PC with Al Henson (2x); Travel to St. George courthouse; File motion for stay of briefing schedule with clerk of court in St. George	ARCH
9634.000	11/22/2016	DFB	A	300.00	1.00	1.00	300.00	Review email from Gaskins; Prepare materials for transmission to Judge Dickson; Prepare email to Judge Dickson; Prepare email to Barry Baker; Review VM from Al Henson; PC with Al Henson; PC with Jimmy Reeves; Revise assignment document	ARCH
9634.000	11/22/2016	DFB	A	0.220			12.98	In house photocopies/scans to date	ARCH
9634.000	11/23/2016	DFB	A	300.00	2.00	2.00	600.00	Telephone conferences with Al Henson (2x); PC with Glenn Little; PC with Ashley Andrews; Prepare documents for T. Limehouse; Review email from Robertson	ARCH
9634.000	11/28/2016	DFB	A	300.00	3.50	3.50	1,050.00	Receipt/review motion to lift stay and motion for expedited hearing filed by T. Robertson; Legal	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
9634.000	11/29/2016	DFB	A	300.00	3.50	3.50	1,050.00	research; Prepare response to motion to lift stay; Review supplemental discovery requests from Robertson; PC with Al Henson; Review voicemails from Henson; Conf with A. Henson; PC with A. Andrews (voicemail) Telephone conference with with Al Henson (2x); PC with Ashley Andrews; PC with Judge Edwards and other counsel; Review emails from Judge Edwards; Prepare emails to Judge Edwards; Revise memorandum opposing motion to lift stay on appeal; Review email from A. Andrews
9634.000	11/30/2016	DFB	A	300.00	3.00	3.00	900.00	Telephone conference with Al Henson; Prepare emails to Judge Edwards; Review emails from Judge Dickson's law clerk; Prepare emails to Judge Dickson's law clerk; Review emails from T. Robertson and B. Gaskins; Revise proposed order sent by T. Robertson to Judge Dickson; Prepare emails to A. Andrews; Review emails from A. Andrews; Review mortgage modification documents from Andrews
9634.000	11/30/2016	DFB	A				25.00	Frank Blanchard, 11/29/2016, Reimbursement for filing fee in Dorchester County Court of Common Pleas for motion to stay briefing schedule
9634.000	11/30/2016	DFB	A				10.68	Postage to date
9634.000	12/01/2016	DFB	A	300.00	0.70	0.70	210.00	Telephone conference with Al Henson; Review emails from A. Andrews; Review email from Judge Dickson's law clerk; Review email from Robertson
9634.000	12/02/2016	DFB	A	300.00	0.50	0.50	150.00	Telephone conferences with Al Henson (2x); Prepare emails to A. Andrews; Review email from Andrews and attachment
9634.000	12/05/2016	DFB	A	300.00	2.00	2.00	600.00	Telephone conferences with Al Henson; Conf with Al Henson to prepare for deposition
9634.000	12/06/2016	DFB	A	300.00	1.00	1.00	300.00	Telephone conferences with Al Henson; Review acknowledgement document from Ashley Andrews; Revise acknowledgement document; Prepare emails to Andrews; Review emails from Robertson and Baker
9634.000	12/07/2016	DFB	A	300.00	7.80	7.80	2,340.00	Attend deposition of Al Henson at Moore & Van Allen's offices
9634.000	12/08/2016	DFB	A	300.00	6.50	6.50	1,950.00	Attend second day of Al Henson's deposition; Conf with Robertson, Baker, and others re issues with

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount	Ref #
Client ID 9634.000 Henson, Jr./Albert T.								
							Whitfield/Little loan extension; Conf with Al Henson to discuss loan extension issues; Review emails from Ashley Andrews; Prepare emails to Andrews	
9634.000	12/08/2016	DFB	A	0.220			0.88 In house photocopies/scans to date	ARCH
9634.000	12/09/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review voicemails from A. Henson; Review email from Andrews	ARCH
9634.000	12/12/2016	DFB	A	300.00	0.20	0.20	60.00 Telephone conference with Al Henson; Review VM from Henson	ARCH
9634.000	12/13/2016	DFB	A	300.00	0.20	0.20	60.00 Prepare email to Ashley Andrews; Review email from Andrews	ARCH
9634.000	12/13/2016	DFB	A				47.22 West Payment Center, Invoice #835214001 12/01/2016, Computer research for November 2016 (Frank Blanchard)	ARCH
9634.000	12/14/2016	DFB	A	300.00	0.30	0.30	90.00 Receipt/review message from Al Henson; PC with Al Henson	ARCH
9634.000	12/15/2016	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from Ashley Andrews	ARCH
9634.000	12/16/2016	DFB	A	300.00	0.20	0.20	60.00 Receipt/review emails from Andrews and Robertson and attachments; Prepare documents for transmittal to client	ARCH
9634.000	12/19/2016	DFB	A	300.00	2.00	2.00	600.00 Conference with Al Henson	ARCH
9634.000	12/28/2016	DFB	A	300.00	0.70	0.70	210.00 Receipt/review notice filed by Richard Henson in probate court; Review Al Henson deposition transcript; Prepare LT Al Henson re notice filed by brother, deposition transcript, and Judge Dickson's order dismissing appeal to probate court	ARCH
9634.000	12/28/2016	DFB	A	0.220			0.44 In house photocopies/scans to date	ARCH
9634.000	12/31/2016	DFB	A				18.84 Postage to date	ARCH
9634.000	01/04/2017	DFB	A				1,057.70 Janice D Hayward RMR, Invoice #JH-3383 12/26/2016, Deposition transcript of Albert T. Henson Jr (Frank Blanchard)	ARCH
9634.000	01/10/2017	DFB	A	300.00	0.50	0.50	150.00 Prepare notice of appeal to SC Court of Appeals; Prepare LT Court of Appeals; Prepare LT clerk of court in Dorchester County	ARCH
9634.000	01/12/2017	DFB	A	300.00	0.20	0.20	60.00 Prepare and finalize appeal documents; Revise LT clerk of court	ARCH
9634.000	01/12/2017	DFB	A				100.00 South Carolina Court of Appeals, 1/12/2017, Filing Fee - Appeal to SC Court of Appeals (Frank Blanchard)	ARCH
9634.000	01/12/2017	DFB	A	0.220			23.54 In house photocopies/scans to date	ARCH
9634.000	01/13/2017	DFB	A	300.00	0.50	0.50	150.00 Telephone conference with Al Henson	ARCH
9634.000	01/17/2017	DFB	A	300.00	0.20	0.20	60.00 Prepare LT court reporter re hearing transcript	ARCH
9634.000	01/18/2017	DFB	A	300.00	3.00	3.00	900.00 Telephone conference with Al Henson; Conf with Al Henson	ARCH

Detail Transaction File List
Rosen Hagood, LLC

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	01/20/2017	DFB	A	300.00	0.10	0.10	30.00	PC with K. Ferri (message); Receipt/review voicemails from Al Henson	ARCH
9634.000	01/23/2017	DFB	A	300.00	0.10	0.10	30.00	Receipt/review voicemail from K. Ferri; Review voicemail from Al Henson	ARCH
9634.000	01/24/2017	DFB	A	300.00	0.30	0.30	90.00	Telephone conference with K. Ferri (VM) (2x); Review VM from Ferri; Review VM from Henson; PC with Al Henson	ARCH
9634.000	01/31/2017	DFB	A	300.00	0.20	0.20	60.00	Review VM from K. Ferri; Telephone conference with K. Ferri (VM); Review VM from Al Henson	ARCH
9634.000	01/31/2017	DFB	A				13.55	Postage to date	ARCH
9634.000	02/01/2017	DFB	A	300.00	0.60	0.60	180.00	Telephone conference with Kathleen Ferri	ARCH
9634.000	02/06/2017	DFB	A	300.00	1.00	1.00	300.00	Review email and letter from T. Robertson; Prepare email to Robertson and Baker; Revise amended answer/counterclaims in estate case; Review VM from K. Ferri; Prepare package to A. Henson	ARCH
9634.000	02/10/2017	DFB	A	300.00	0.60	0.60	180.00	Telephone conference with Al Henson	ARCH
9634.000	02/13/2017	DFB	A	300.00	2.00	2.00	600.00	Telephone conference with A. Henson; Conf with A. Henson	ARCH
9634.000	02/14/2017	DFB	A	300.00	0.50	0.50	150.00	Prepare email to Kathleen Ferri	ARCH
9634.000	02/16/2017	DFB	A	300.00	0.80	0.80	240.00	Telephone conference with Al Henson; Prepare motion to amend answer in estate case; Prepare LT probate court	ARCH
9634.000	02/16/2017	DFB	A	0.220			17.38	In house photocopies/scans to date	ARCH
9634.000	02/22/2017	DFB	A	300.00	0.60	0.60	180.00	Receipt/review VM from probate court; PC with probate court; Prepare deposition notices for Richard and Vann Henson; Prepare letter to Baker and Robertson	ARCH
9634.000	02/22/2017	DFB	A	0.220			4.40	In house photocopies/scans to date	ARCH
9634.000	02/23/2017	DFB	A	300.00	0.10	0.10	30.00	Telephone conference with probate court	ARCH
9634.000	02/28/2017	DFB	A	300.00	0.60	0.60	180.00	Telephone conference with Al Henson	ARCH
9634.000	02/28/2017	DFB	A				11.92	Postage to date	ARCH
9634.000	03/02/2017	DFB	A	300.00	1.50	1.50	450.00	Attend meeting with Al Henson	ARCH
9634.000	03/09/2017	DFB	A	300.00	1.50	1.50	450.00	Conference with Al Henson; Review email from Barry Baker	ARCH
9634.000	03/09/2017	DFB	A	0.220			22.88	In house photocopies/scans to date	ARCH
9634.000	03/15/2017	DFB	A	300.00	0.20	0.20	60.00	Prepare emails to Baker and Robertson; Review email from Robertson	ARCH
9634.000	03/16/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review emails from Baker and Robertson; Prepare email to Robertson and Baker	ARCH
9634.000	03/17/2017	DFB	A	300.00	0.30	0.30	90.00	Prepare revised deposition notices for Al's brothers; Prepare LT Robertson and Baker	ARCH

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Detail Transaction File List
Rosen Hagood, LLC

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	03/17/2017	DFB	A	0.220			3.08	In house photocopies/scans to date	ARCH
9634.000	03/22/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review order from Judge Edwards granting motion to amend answer; Prepare email to Judge Edwards	ARCH
9634.000	03/23/2017	DFB	A	300.00	0.20	0.20	60.00	Prepare and execute letter to court reporter	ARCH
9634.000	03/23/2017	DFB	A	300.00	0.30	0.30	90.00	Prepare LT probate court; Finalize and execute amended answer and counterclaims	ARCH
9634.000	03/23/2017	DFB	A	0.220			18.04	In house photocopies/scans to date	ARCH
9634.000	03/31/2017	DFB	A				15.56	Postage to date	ARCH
9634.000	03/31/2017	DFB	A	0.220			4.18	In house photocopies/scans to date	ARCH
9634.000	04/04/2017	DFB	A	300.00	0.20	0.20	60.00	Telephone conference with Al Henson	ARCH
9634.000	04/05/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review emails and letter from B. Baker; Prepare email to Baker	ARCH
9634.000	04/05/2017	DFB	A	0.220			0.22	In house photocopies/scans to date	ARCH
9634.000	04/06/2017	DFB	A	300.00	2.00	2.00	600.00	Conf with Al Henson	ARCH
9634.000	04/06/2017	DFB	A	0.220			25.96	In house photocopies/scans to date	ARCH
9634.000	04/20/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review VM from Henson; PC with A. Henson	ARCH
9634.000	04/21/2017	DFB	A	300.00	2.20	2.20	660.00	Conference with Al Henson	ARCH
9634.000	04/27/2017	DFB	A	300.00	5.00	5.00	1,500.00	Prepare appellate brief for appeal in SC Court of Appeals; Prepare designation of matter to be included in record on appeal; Legal research/Westlaw research	ARCH
9634.000	04/28/2017	DFB	A	300.00	6.00	6.00	1,800.00	Review reply to counterclaims from B. Baker; Prepare and revise appellate brief for appeal in SC Court of Appeals; Prepare and revise designation of matter to be included in record on appeal; Legal research/Westlaw research	ARCH
9634.000	04/28/2017	DFB	A				139.75	Hilda Jordan, inv 17-014, 4/8/17 for transcript of record for November 21, 2016(Frank Blanchard)	ARCH
9634.000	04/30/2017	DFB	A				1.38	Postage to date	ARCH
9634.000	05/01/2017	DFB	A	300.00	5.00	5.00	1,500.00	Prepare and finalize initial appellate brief; Legal research; Prepare and finalize designation of matter for record on appeal; Prepare LT court of appeals; Prepare proof of service	ARCH
9634.000	05/01/2017	DFB	A	0.220			47.08	In house photocopies/scans to date	ARCH
9634.000	05/02/2017	DFB	A	300.00	6.50	6.50	1,950.00	Prepare for depositions of Scott Henson and Ken Henson; PC with Al Henson; Review VM from Al Henson	ARCH
9634.000	05/04/2017	DFB	A	300.00	0.10	0.10	30.00	Receipt/review emails from T. Robertson; Prepare email to Robertson	ARCH
9634.000	05/05/2017	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from T. Robertson re depositions	ARCH

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Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount		Ref #
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	05/08/2017	DFB	A	300.00	0.80	0.80	240.00	Receipt/review VM from Al Henson; PC with Al; Review emails from T. Robertson; Prepare emails to Robertson; Review motion for extension from Robertson	ARCH
9634.000	05/12/2017	DFB	A	300.00	0.10	0.10	30.00	Receipt/review VM from Al Henson	ARCH
9634.000	05/15/2017	DFB	A	300.00	3.00	3.00	900.00	Telephone conference with Al Henson; Review order from SC court of appeals; Prepare for depositions; Prepare exhibits for depositions	ARCH
9634.000	05/15/2017	DFB	A				123.78	West Payment Center, Invoice #836098217 5/01/2017, Computer research April 2017 (Frank Blanchard)	ARCH
9634.000	05/15/2017	DFB	A	0.220			0.88	In house photocopies/scans to date	ARCH
9634.000	05/16/2017	DFB	A	300.00	7.00	7.00	2,100.00	Prepare for depositions of Ken Henson and Scott Henson; Prepare and revise exhibits for depositions; Conf with Al Henson to prepare for depositions	ARCH
9634.000	05/17/2017	DFB	A	300.00	8.00	8.00	2,400.00	Prepare for deposition; Attend and take deposition of Ken Henson; Conferences with Al Henson	ARCH
9634.000	05/18/2017	DFB	A	300.00	8.00	8.00	2,400.00	Prepare for deposition; Attend and take deposition of Ken Henson; Conferences with Al Henson	ARCH
9634.000	05/23/2017	DFB	A	300.00	0.80	0.80	240.00	Telephone conference with Al Henson; Prepare email to Baker and Robertson	ARCH
9634.000	05/24/2017	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from Robertson	ARCH
9634.000	05/31/2017	DFB	A	300.00	0.20	0.20	60.00	Prepare email to Robertson and Baker re Scott deposition; Review emails from Baker, Weil, and Robertson	ARCH
9634.000	05/31/2017	DFB	A				16.45	Postage to date	ARCH
9634.000	06/07/2017	DFB	A	300.00	0.30	0.30	90.00	Prepare emails to Robertson and Baker; Review emails from Weil; PC with Al Henson (no answer); Review VM from Henson	ARCH
9634.000	06/08/2017	DFB	A				1,070.40	Clark & Associates, Invoice #47259 6/2/2017, Deposition transcript of Vann Kenneth Henson 5/17/2017 (Frank Blanchard)	ARCH
9634.000	06/08/2017	DFB	A				1,355.30	Clark & Associates, Invoice #47262 6/2/2017, Deposition transcript of Vann Kenneth Henson 5/18/2017 (Frank Blanchard)	ARCH
9634.000	06/16/2017	DFB	A	300.00	0.50	0.50	150.00	Receipt/review emails from Robertson, Weil, Baker and Judge Edwards; Prepare email to Robertson; Prepare email to Judge Edwards	ARCH
9634.000	06/20/2017	DFB	A	300.00	0.40	0.40	120.00	Receipt/review emails from Robertson and Judge Edwards; PC with Al Henson; Review voicemessages from Henson	ARCH
9634.000	06/21/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review email from Barry	ARCH

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<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	07/05/2017	DFB	A	300.00	3.50	3.50	1,050.00	Baker; Conf with Baker at Charleston courthouse re trial date in Henson Receipt/review initial respondent's brief and designation of matter to be included in record from Trudy Robertson; Prepare draft of initial reply brief for SC Court of Appeals; Legal research; Westlaw research	ARCH
9634.000	07/06/2017	DFB	A	300.00	3.00	3.00	900.00	Prepare draft of initial reply brief for SC Court of Appeals; Legal research; Westlaw research	ARCH
9634.000	07/07/2017	DFB	A	300.00	4.00	4.00	1,200.00	Prepare and finalize initial reply brief for SC Court of Appeals; Legal research; Westlaw research; Prepare LT Court of Appeals	ARCH
9634.000	07/11/2017	DFB	A	300.00	4.00	4.00	1,200.00	Prepare for status conference; Travel to and from St. George for status conf with Judge Edwards; Various telephone conferences with Al Henson; Conf with Al Henson	ARCH
9634.000	07/26/2017	DFB	A	300.00	0.10	0.10	30.00	Telephone conference with SC court of appeals	ARCH
9634.000	07/28/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review email from Trudy Robertson; Review LF SC Court of Appeals	ARCH
9634.000	07/31/2017	DFB	A	300.00	4.20	4.20	1,260.00	Prepare record on appeal; Prepare index to record on appeal; PC with Robertson's assistant re documents needed for record on appeal (2x); Review voicemails from Robertson; Prepare LT Judge Blunt re notice of hearing; Prepare email to Robertson; Review email from Robertson; PC with Judge Blunt assistant	ARCH
9634.000	07/31/2017	DFB	A				12.20	Postage to date	ARCH
9634.000	08/01/2017	DFB	A	300.00	3.00	3.00	900.00	Prepare and finalize record on appeal and index to record; bate-stamp record on appeal; Prepare email to Robertson; Review email from Robertson; Prepare LT Judge Edwards; Review LF Robertson to Judge Edwards; Prepare response email to Judge Edwards	ARCH
9634.000	08/07/2017	DFB	A	300.00	0.70	0.70	210.00	Review record on appeal from printer; Prepare proof of service; Prepare LT Court of Appeals; Review emails from Judge Edwards; Prepare email to Judge Edwards; Review emails from Weil and Robertson	ARCH
9634.000	08/07/2017	DFB	A				28.25	Petty Cash 8/7/17 for postage on 8/7/17	ARCH
9634.000	08/07/2017	DFB	A	0.220			2.42	In house photocopies/scans to date	ARCH
9634.000	08/09/2017	DFB	A	300.00	1.00	1.00	300.00	Telephone conference with Judge Edwards, T. Robertson, M. Weil, and	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							B. Baker re status of trial date and other issues; PC with Robertson, Weil, and Baker; Review emails from Baker office	
9634.000	08/09/2017	DFB	A				811.18 ProLegal Discovery Solutions, Invoice #CHS147785 8/4/2017, Printing and binding charges (Frank Blanchard)	ARCH
9634.000	08/10/2017	DFB	A	300.00	2.20	2.20	660.00 Prepare final briefs for appeal in SC Court of Appeals; PC with Al Henson (VM - no message)	ARCH
9634.000	08/11/2017	DFB	A	300.00	1.00	1.00	300.00 Telephone conference with Al Henson; Prepare list of topics for Al to present to Whitfield and Little	ARCH
9634.000	08/14/2017	DFB	A	300.00	1.00	1.00	300.00 Telephone conference with Al Henson; Review emails from Baker; Prepare email to Baker; Review emails from Robertson and Baker; Review various emails re final briefs for appeal	ARCH
9634.000	08/15/2017	DFB	A	300.00	2.20	2.20	660.00 Prepare for meeting; Prepare email to Robertson; Review email from Robertson; Conference with Al Henson, Trudy Robertson, Barry Baker and Scott Henson; Conf with Al Henson	ARCH
9634.000	08/23/2017	DFB	A	300.00	0.80	0.80	240.00 Review voicemails from Al Henson; PC with Henson; Review final briefs from printer; Prepare LT court of appeals re filing of final briefs; Prepare proof of service	ARCH
9634.000	08/23/2017	DFB	A	0.220			1.98 In house photocopies/scans to date	ARCH
9634.000	08/28/2017	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from T. Robertson	ARCH
9634.000	08/30/2017	DFB	A				220.01 ProLegal Discovery, Invoice #CHS147892 8/18/2017, Printing & binding charges (Frank Blanchard)	ARCH
9634.000	08/31/2017	DFB	A				16.82 Postage to date	ARCH
9634.000	09/05/2017	DFB	A	300.00	0.30	0.30	90.00 Prepare email to Robertson; Review email from Robertson; Review final brief filed by Scott and Ken in Court of Appeals	ARCH
9634.000	09/14/2017	DFB	A	300.00	0.50	0.50	150.00 Telephone conference with Al Henson	ARCH
9634.000	09/15/2017	DFB	A	300.00	0.30	0.30	90.00 Receipt/review supplemental discovery response from Barry Baker; Review affidavit from Sheila Smith; Review email from Trudy Robertson	ARCH
9634.000	09/18/2017	DFB	A	300.00	3.10	3.10	930.00 Telephone conference with Al Henson; Conf with Henson	ARCH
9634.000	09/19/2017	DFB	A	300.00	2.50	2.50	750.00 Telephone conference with Steinberg law firm re use of conference room; Prepare email to Robertson and Baker re draft of consent order; Prepare notices of depositions for Scott Henson, Sheila Smith, Edward	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>	
Client ID 9634.000 Henson, Jr./Albert T.									
							Clausen, and Vallarie Clausen; Prepare subpoenas for Sheila Smith, Edward Clausen, and Vallarie Clausen; Prepare emails to S. Elliott at Steinberg law firm; Review email from Elliott; Prepare emails to Baker and Robertson re depositions and trial; Review emails from Robertson and Baker re trial date and depositions; Prepare letters to Sheila Smith, Edward Clausen, and Vallarie Clausen re subpoenas and depositions		
9634.000	09/19/2017	DFB	A	0.220			14.52	In house photocopies/scans to date	ARCH
9634.000	09/20/2017	DFB	A	300.00	1.30	1.30	390.00	Receipt/review email from M. Weil; Review motion to lift stay filed by T. Robertson; Revise subpoenas, notices, and letters for depositions of S. Smith, E. Clausen, and V. Clausen; Prepare emails to Robertson and Baker; Prepare emails to Shanon at Steinberg law firm re use of room; Review emails from Shanon	ARCH
9634.000	09/20/2017	DFB	A				36.00	Sheila Smith, 9/20/2017, Reimbursement for witness fee and mileage for deposition (Frank Blanchard)	ARCH
9634.000	09/20/2017	DFB	A				36.00	Edward Clausen, 9/20/2017, Reimbursement for witness fee and mileage for deposition (Frank Blanchard)	ARCH
9634.000	09/20/2017	DFB	A				36.00	Vallarie Clausen, 9/20/2017, Reimbursement for witness fee and mileage for deposition (Frank Blanchard)	ARCH
9634.000	09/20/2017	DFB	A	0.220			15.62	In house photocopies/scans to date	ARCH
9634.000	09/21/2017	DFB	A				13.50	Petty Cash 9/21/17 for postage on 8/25/17	ARCH
9634.000	09/22/2017	DFB	A	300.00	6.50	6.50	1,950.00	Prepare draft of proposed consent order involving options to raise money needed to pay off Whitfield/Little loan; Conf with Al Henson to prepare for trial	ARCH
9634.000	09/25/2017	DFB	A	300.00	2.50	2.50	750.00	Telephone conference with Kathleen Ferri; Conf with Al Henson; Review email from Ferri; Prepare email to Ferri; Review email from S. Elliott re use of conference room for deposition; Prepare email to Elliott; Review VM from K. Ferri	ARCH
9634.000	09/26/2017	DFB	A	300.00	3.00	3.00	900.00	Receipt/review email from Judge Edwards' office; PC with Al Henson; Revise draft of proposed consent order; Conf with Al Henson	ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount		Ref #
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	09/27/2017	DFB	A	300.00	1.00	1.00	300.00	Conference with Al Henson; Revise consent order; PC with Al Henson	ARCH
9634.000	09/28/2017	DFB	A	300.00	1.00	1.00	300.00	Phone conferences with Al Henson; Revise consent order; Prepare fax to Henson	ARCH
9634.000	09/29/2017	DFB	A	300.00	0.50	0.50	150.00	Telephone conference with Al Henson; Review email from Ferri	ARCH
9634.000	09/30/2017	DFB	A				8.26	Postage to date	ARCH
9634.000	10/03/2017	DFB	A	300.00	4.20	4.20	1,260.00	Telephone conference with Al Henson; Revise consent order; Prepare email to Robertson and Baker; Review email from Baker; Prepare and revise supplemental discovery responses; Prepare and date-stamp documents for production; Prepare LT Baker and Robertson; Prepare email to Baker and Robertson with supplemental discovery responses; Review discovery file for trial preparation; Review VM from Probate Court; PC with Gayle in probate court	ARCH
9634.000	10/03/2017	DFB	A	0.220			7.04	In house photocopies/scans to date	ARCH
9634.000	10/04/2017	DFB	A	300.00	4.20	4.20	1,260.00	Prepare for meeting with K. Ferri; Conference with A. Henson and K. Ferri; Review VM from Ferri; Conf with A. Henson; Prepare client documents for production; Prepare draft of affidavit for F. Shucks; Prepare for trial	ARCH
9634.000	10/04/2017	DFB	A				49.20	Process Service Inc, Invoice #LEX-2017002402 9/26/2017, Service of process on Sheila Smith (Frank Blanchard)	ARCH
9634.000	10/04/2017	DFB	A	0.220			1.32	In house photocopies/scans to date	ARCH
9634.000	10/05/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review VM from Al Henson; Review Dorchester county website for case information involving lawsuit filed by Scott Henson against Eunice Page	ARCH
9634.000	10/06/2017	DFB	A	300.00	3.00	3.00	900.00	Telephone conference with Al Henson (2x); Conf with Al Henson; Prepare trial subpoena and acceptance for K. Ferri; Prepare email to Ferri; Review email from Probate Court re hearing; PC with Charlene Alford; PC with John Frampton (VM)	ARCH
9634.000	10/06/2017	DFB	A	0.220			1.54	In house photocopies/scans to date	ARCH
9634.000	10/09/2017	DFB	A	300.00	6.50	6.50	1,950.00	Travel to and from St George to review case file involving Scott's lawsuit against Eunice Page; PC with J. Frampton (VM) (2x); PC with Frampton's paralegal; Review VM from Frampton (2x); PC with Al Henson	ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount		Ref #
Client ID 9634.000 Henson, Jr./Albert T.									
								(2x); Conf with Al Henson; Prepare for Scott Henson deposition; Prepare outline	
9634.000	10/09/2017	DFB	A	0.220			2.20	In house photocopies/scans to date	ARCH
9634.000	10/10/2017	DFB	A	300.00	7.30	7.30	2,190.00	Trial preparation; Several phone calls with Al Henson; Review fax from Henson; PC with Brandt Shelbourne; PC with Jimmy Reeves; PC with John Frampton; PC with Donald Howe; Prepare email to Howe; Review deposition notices from Barry Baker; Prepare for Scott Henson deposition; Prepare email to Baker and Robertson with supplemental discovery responses	ARCH
9634.000	10/10/2017	DFB	A				89.20	Process Service Inc, Invoice #2017002400 9/25/2017, Service of process on Edward Clausen (Frank Blanchard)	ARCH
9634.000	10/10/2017	DFB	A				30.00	Process Service Inc, Invoice #2017002401 9/25/2017, Service of process on Vallarie Clausen (Frank Blanchard)	ARCH
9634.000	10/11/2017	DFB	A	300.00	6.00	6.00	1,800.00	Telephone conferences with Al Henson; Prepare for Scott Henson deposition; Prepare exhibits for deposition; Review supplemental discovery responses from Robertson; Review emails from Baker and Robertson; Review LF Donald Howe; Trial preparation	ARCH
9634.000	10/12/2017	DFB	A	300.00	7.50	7.50	2,250.00	Attend deposition of Scott Henson; Conferences with client	ARCH
9634.000	10/13/2017	DFB	A	300.00	7.50	7.50	2,250.00	Attend deposition of Scott Henson; Conferences with client; PC with Michael Ferri; Prepare subpoena for M. Ferri; Prepare email to M. Ferri; PC with Jim Wright; Review email from Robertson; PC with Probate Court re hearing; Prepare memorandum of law in opposition to lift stay caused by appeal; Legal research	ARCH
9634.000	10/13/2017	DFB	A	0.220			3.52	In house photocopies/scans to date	ARCH
9634.000	10/16/2017	DFB	A	300.00	7.50	7.50	2,250.00	Prepare for hearing; Prepare emails to Judge Edwards and clerk of probate court; Review email from Robertson; Travel to and from St. George for hearing; PC with Al Henson; Attend hearing before Judge Edwards; Travel to Dorchester Delinquent Tax Office for meeting with J. Frampton and witnesses; Conf with Frampton, K. Patrick, L. Johnston, and M. Jones; Conferences	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
9634.000	10/17/2017	DFB	A	300.00	8.00	8.00	2,400.00	with Al Henson; Prepare email to Robertson and Baker with supplemental discovery production Travel to and from Summerville for depositions; Attend depositions of Sheila Smith and Vallarie Clausen; Conferences with client; Travel to hom of F. Hucks; Conf with Mr. & Mrs. Hucks to sign affidavit ARCH
9634.000	10/18/2017	DFB	A	300.00	0.20	0.20	60.00	Receipt/review draft of consent order from Robertson ARCH
9634.000	10/19/2017	DFB	A	300.00	0.30	0.30	90.00	Telephone conference with Al Henson ARCH
9634.000	10/23/2017	DFB	A	300.00	2.00	2.00	600.00	Receipt/review email from Robertson; ARCH Prepare email to Robertson; PC with Al Henson; Conf with Al Henson; Revise draft of consent order; Prepare email to Robertson with changes to consent order
9634.000	10/24/2017	DFB	A	300.00	0.10	0.10	30.00	Receipt/review VM from Al Henson ARCH
9634.000	10/25/2017	DFB	A	300.00	0.30	0.30	90.00	Receipt/review email from Barry ARCH Baker's office with subpoenas to Sands and Ferri; Prepare email to Ferri; Review emails from Robertson; Review LF Robertson; Review email from Baker
9634.000	10/26/2017	DFB	A	300.00	0.20	0.20	60.00	Prepare email to Sands re subpoena; ARCH Review VM from Sands; Review emails from Robertson and Andrews
9634.000	10/27/2017	DFB	A	300.00	1.30	1.30	390.00	Telephone conference with D. Sands; ARCH PC with A. Henson
9634.000	10/30/2017	DFB	A	300.00	2.00	2.00	600.00	Telephone conference with Al Henson ARCH (8x); PC with Anthony Stith; Review email and attachments from T. Robertson; Prepare email to Stith; Review LF Stith; Prepare email to Robertson and Baker; Review emails from Robertson; Prepare email to Robertson
9634.000	10/30/2017	DFB	A				22.50	Sandlapper Reporting LLC, Invoice #MIE-17-1255 10/17/17, Copy of Agreement for the Record (Frank Blanchard) ARCH
9634.000	10/31/2017	DFB	A	300.00	1.20	1.20	360.00	Receipt/review order from Judge Edwards; Review emails from Baker and Robertson; Prepare email to Baker and Robertson; Review LF Baker; Prepare email to K. Ferri ARCH
9634.000	10/31/2017	DFB	A				1,581.05	Clark & Associates, Invoice #49606 10/26/2017, Deposition transcript of Richard Scott Henson Vol I on 10/12/2017 (Frank Blanchard) ARCH
9634.000	10/31/2017	DFB	A				711.65	Clark & Associates, Invoice #49609 10/27/2017, Deposition transcript of Richard Scott Henson Vol II on ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							10/13/2017 (Frank Blanchard)	
9634.000	10/31/2017	DFB	A				3.83 Postage to date	ARCH
9634.000	11/01/2017	DFB	A	300.00	4.00	4.00	1,200.00 Receipt/review emails from Robertson and Baker; PC with Baker and Robertson; PC with Al Henson; Draft letter to Judge Edwards re status of loan term sheets and other issues;	ARCH
9634.000	11/02/2017	DFB	A	300.00	1.00	1.00	300.00 Prepare emails to Baker and Robertson; Review emails from Robertson and Baker; Review emails from Judge Edwards; PC with Al Henson; Revise LT Judge Edwards	ARCH
9634.000	11/03/2017	DFB	A	300.00	2.00	2.00	600.00 Revise LT Judge Edwards; Prepare email to Judge Edwards; PC with Trudy Robertson; Barry Baker, and Judge Edwards; Conf with Al Henson; Review email from Moraska	ARCH
9634.000	11/06/2017	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from A. Andrews; Review email from Baker; Review VM from client	ARCH
9634.000	11/07/2017	DFB	A	300.00	0.10	0.10	30.00 Receipt/review VM from client	ARCH
9634.000	11/08/2017	DFB	A	300.00	0.80	0.80	240.00 PC with Al Henson; PC with Ashley Andrews; Prepare LT Ferri re objections to subpoena; Prepare LT Sands re objection to subpoena	ARCH
9634.000	11/09/2017	DFB	A	300.00	0.10	0.10	30.00 Telephone conference with Al Henson	ARCH
9634.000	11/10/2017	DFB	A	300.00	0.50	0.50	150.00 Telephone conference with Al Henson; Conf with Al Henson; Prepare email to A. Stith	ARCH
9634.000	11/14/2017	DFB	A	300.00	1.00	1.00	300.00 Review email from A. Stith; Prepare email to Stith; Prepare letter to Judge Edwards; Finalize and execute letters to Ferri and Sands re subpoenas; Prepare LT Baker and Robertson re their clients' unauthorized access to premises	ARCH
9634.000	11/14/2017	DFB	A				1,531.40 Clark & Associates, Invoice #49638 11/1/2017, Deposition transcripts of Sheila Smith and Vallarie Clausen on 10/17/2017 (Frank Blanchard)	ARCH
9634.000	11/14/2017	DFB	A				268.00 Clearview Legal Video, Invoice #204225 11/07/2017, DVD copy of the deposition of S. Smith & V. Clawson (Frank Blanchard)	ARCH
9634.000	11/15/2017	DFB	A	300.00	0.70	0.70	210.00 Receipt/review emails from Trudy Robertson; Review order from Judge Edwards; Prepare email to Judge Edwards; PC with Al Henson	ARCH
9634.000	11/17/2017	DFB	A	300.00	1.40	1.40	420.00 Telephone conference with Al Henson (2x); PC with Ashley Andrews; Review email from Andrews; Review emails from Baker and Robertson; Review LF Baker	ARCH
9634.000	11/20/2017	DFB	A	300.00	4.00	4.00	1,200.00 Prepare motion involving extension	ARCH

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<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							of Whitfield/Little loan; Prepare LT Judge Edwards; Review email from Judge Edwards; Review emails from Baker and Andrews; Prepare email to Trudy Robertson; PC with Al Henson	
9634.000	11/21/2017	DFB	A	300.00	3.50	3.50	1,050.00 Prepare LT Baker re subpoenas to Ferri and Sands and Scott Henson's trespass on car lot property; PC with Al Henson (2x); Revise LT Judge Edwards	ARCH
9634.000	11/28/2017	DFB	A	300.00	1.00	1.00	300.00 Review voicemails from Al Henson; Telephone conference with Al Henson	ARCH
9634.000	11/29/2017	DFB	A	300.00	1.50	1.50	450.00 Telephone conferences with Al Henson; Review email from Judge Blunt's clerk; PC with Ashley Andrews; Prepare and revise motion to authorize Andrews to sign loan agreement with Buxton	ARCH
9634.000	11/30/2017	DFB	A	300.00	1.50	1.50	450.00 Telephone conferences with Al Henson; Revise and finalize motion to authorize special fiduciary to take actions; Prepare LT Probate Judge; Review voicemails from Al Henson	ARCH
9634.000	11/30/2017	DFB	A	0.220			25.74 In house photocopies/scans to date	ARCH
9634.000	11/30/2017	DFB	A				18.45 Postage to date	ARCH
9634.000	12/01/2017	DFB	A	300.00	1.50	1.50	450.00 Telephone conferences with Al Henson; Prepare email to Ashley Andrews; Review email from Andrews; PC with Judge Edwards' clerk (Devan); Prepare email to Robertson and Baker	ARCH
9634.000	12/04/2017	DFB	A	300.00	3.00	3.00	900.00 Telephone conferences with Al Henson; Prepare emails to Judge Edwards; Review emails from Baker, Robertson, and Andrews; PC with Judge Edwards, Baker, Robertson and Andrews; Prepare emails to Andrews; Review emails from Andrews	ARCH
9634.000	12/05/2017	DFB	A	300.00	3.00	3.00	900.00 Telephone conferences with Al Henson; Prepare emails to Baker and Robertson; Conf with Al Henson; PC with Ashley Andrews; Review emails from Baker; Prepare letter to Judge Edwards; Prepare email to Edwards; Review motion for rule to show cause from Robertson; Review VM from Henson; Review email from Andrews	ARCH
9634.000	12/06/2017	DFB	A	300.00	0.70	0.70	210.00 Receipt/review email from Judge Edwards; Prepare email to Judge Edwards; PC with Al Henson; Review email from Baker	ARCH
9634.000	12/07/2017	DFB	A	300.00	0.30	0.30	90.00 Prepare email to Judge Edwards; Review emails from Baker; Review LF	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
9634.000	12/07/2017	DFB	A	0.540			27.50 Baker Tyler Malone, 12/7/2017, Reimbursement for mileage to Dorchester County Courthouse for filing on 11/30/17 (Frank Blanchard)	ARCH
9634.000	12/08/2017	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from Judge Edwards	ARCH
9634.000	12/31/2017	DFB	A				0.46 Postage to date	ARCH
9634.000	01/05/2018	DFB	A	300.00	0.10	0.10	30.00 Receipt/review VM from Al Henson	ARCH
9634.000	01/10/2018	DFB	A	300.00	0.50	0.50	150.00 Telephone conference with Al Henson	ARCH
9634.000	01/11/2018	DFB	A	300.00	0.50	0.50	150.00 Telephone conference with Al Henson	ARCH
9634.000	01/17/2018	DFB	A	300.00	1.60	1.60	480.00 Conference with Al Henson	ARCH
9634.000	01/18/2018	DFB	A	300.00	0.20	0.20	60.00 Receipt/review email and letter from B. Baker; PC with Larry Dodds office	ARCH
9634.000	02/05/2018	DFB	A	300.00	0.10	0.10	30.00 Receipt/review LF Baker re subpoena to Dr. Michaelson	ARCH
9634.000	03/20/2018	DFB	A	300.00	0.20	0.20	60.00 Telephone conference with Al Henson	ARCH
9634.000	04/04/2018	DFB	A	300.00	0.30	0.30	90.00 Prepare LT Barry Baker	ARCH
9634.000	04/09/2018	DFB	A	300.00	0.10	0.10	30.00 Receipt/review Robertson's motion to lift stay in SC Court of Appeals	ARCH
9634.000	04/10/2018	DFB	A	300.00	2.00	2.00	600.00 Prepare and draft return to Respondents' motion for stay in SC Court of Appeals	ARCH
9634.000	04/12/2018	DFB	A	300.00	3.00	3.00	900.00 Prepare and revise return to motion for relief from stay in Court of Appeals; Westlaw research; Legal research	ARCH
9634.000	04/13/2018	DFB	A	300.00	4.50	4.50	1,350.00 Prepare and finalize return to motion for relief from stay in SC Court of Appeals; Prepare exhibits; Prepare LT Court of Appeals; Prepare proof of service; Prepare LT client	ARCH
9634.000	04/13/2018	DFB	A	0.220			159.28 In house photocopies/scans to date	ARCH
9634.000	04/16/2018	DFB	A	300.00	0.10	0.10	30.00 Review order denying motion for stay	ARCH
9634.000	04/17/2018	DFB	A	300.00	0.20	0.20	60.00 Prepare LT client re order denying motion for stay	ARCH
9634.000	04/17/2018	DFB	A	0.220			0.44 In house photocopies/scans to date	ARCH
9634.000	04/18/2018	DFB	A	300.00	0.40	0.40	120.00 Receipt/review supplemental discovery responses and documents from Baker	ARCH
9634.000	04/19/2018	DFB	A	300.00	0.70	0.70	210.00 Prepare LT Baker; Prepare package of documents to send to client; Prepare LT J. Frampton	ARCH
9634.000	04/19/2018	DFB	A	0.220			1.32 In house photocopies/scans to date	ARCH
9634.000	04/26/2018	DFB	A	300.00	0.80	0.80	240.00 Telephone conference with Al Henson; Review VM from Henson	ARCH
9634.000	04/27/2018	DFB	A	300.00	0.10	0.10	30.00 Review emails and letter from B. Baker re medical records	ARCH
9634.000	04/30/2018	DFB	A				36.92 Postage to date	ARCH
9634.000	05/01/2018	DFB	A	300.00	0.10	0.10	30.00 Review email from Baker with supplemental discovery responses in Estate case	ARCH
9634.000	05/02/2018	DFB	A	300.00	0.10	0.10	30.00 Review email from T. Horton with Dorchester County re FOIA request	ARCH

Detail Transaction File List
Rosen Hagood, LLC

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	05/03/2018	DFB	A	300.00	0.50	0.50	150.00	Receipt/review notice from Court of Appeals; Review documents from County in response to FOIA request; Prepare email to County; Prepare package for client	ARCH
9634.000	05/04/2018	DFB	A				56.85	Dorchester County, 5/4/2018, Fee for FOIA records request (Frank Blanchard)	ARCH
9634.000	05/21/2018	DFB	A	300.00	0.40	0.40	120.00	Review email from DeGolyer; Review ARCH emails from Baker and Robertson; Prepare email to DeGolyer	ARCH
9634.000	05/22/2018	DFB	A	300.00	0.20	0.20	60.00	Review emails from DeGolyer; Prepare email to DeGolyer	ARCH
9634.000	05/25/2018	DFB	A	300.00	0.10	0.10	30.00	Prepare email to Devan Kociuruba in Dorchester probate court re conflicts for hearing dates	ARCH
9634.000	05/31/2018	DFB	A				3.36	Postage to date	ARCH
9634.000	06/04/2018	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from Tiffany Norton with FOIA documents	ARCH
9634.000	06/10/2018	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from DeGolyer re hearing	ARCH
9634.000	06/11/2018	DFB	A	300.00	0.20	0.20	60.00	Receipt/review package from Dorchester County; Prepare package for client	ARCH
9634.000	06/13/2018	DFB	A	300.00	0.10	0.10	30.00	Prepare email to Probate Court	ARCH
9634.000	06/15/2018	DFB	A	300.00	0.10	0.10	30.00	Review order from SC Court of Appeals	ARCH
9634.000	06/20/2018	DFB	A	300.00	0.10	0.10	30.00	Receipt/review notice of hearing	ARCH
9634.000	06/23/2018	DFB	A	300.00	0.10	0.10	30.00	Prepare email to T. Currin re LR assignment	ARCH
9634.000	06/25/2018	DFB	A	300.00	5.50	5.50	1,650.00	Legal research; Westlaw research; Prepare petition for rehearing in SC Court of Appeals	ARCH
9634.000	06/26/2018	DFB	A	300.00	4.50	4.50	1,350.00	Prepare and finalize petition for rehearing in SC Court of Appeals; Westlaw research; Prepare LT SC Court of Appeals; Prepare LT client re status of appeal; Conf with T. Currin re LR assignment	ARCH
9634.000	06/26/2018	DFB	A				25.00	SC Court of Appeals, 6/26/2018, Filing Fee - Petition for Rehearing (Frank Blanchard)	ARCH
9634.000	06/26/2018	DFB	A	0.220			5.72	In house photocopies/scans to date	ARCH
9634.000	06/27/2018	DFB	A	300.00	0.50	0.50	150.00	Telephone conference with Donna Sands; Prepare LT client re FOIA records and hearing; PC with Probate Court re hearing; Review FOIA documents	ARCH
9634.000	06/28/2018	DFB	A	300.00	0.40	0.40	120.00	Telephone conference with Dorchester Probate Court; Prepare emails to Baker office; Review email from Baker office; Review email from Currin re prejudgment interest issue	ARCH
9634.000	06/28/2018	DFB	A				16.01	Dorchester County, 6/28/2018, FOIA	ARCH

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Detail Transaction File List
Rosen Hagood, LLC

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
9634.000	06/29/2018	DFB	A	300.00	0.30	0.30	90.00	605 N. Main Street (Frank Blanchard) Review LF Court of Appeals re petition for rehearing; Conf with Currin re prejudgment interest research; Review prejudgment interest research
9634.000	06/29/2018	DFB	A				12.23	Postage to date
9634.000	07/02/2018	DFB	A	300.00	0.30	0.30	90.00	Prepare LT client
9634.000	07/13/2018	DFB	A	0.220			3.52	In house photocopies/scans to date
9634.000	07/19/2018	DFB	A	300.00	0.50	0.50	150.00	Telephone conference with Al Henson
9634.000	07/20/2018	DFB	A	300.00	0.10	0.10	30.00	Review VM from Al Henson
9634.000	07/23/2018	DFB	A	300.00	0.10	0.10	30.00	Receipt/review VM from Al Henson
9634.000	07/23/2018	DFB	A				24.01	Federal Express, Invoice #6-246-04151 7/17/2018, Delivery charges to Jenny Abbott Kitchings on 6/27/2018 (Frank Blanchard)
9634.000	07/25/2018	DFB	A				52.95	West Payment Center, Invoice #838519256 7/01/2018, Computer research for June 2018 (Frank Blanchard)
9634.000	07/26/2018	DFB	A	300.00	0.70	0.70	210.00	Telephone conference with Al Henson; Prepare email to Robertson and Baker
9634.000	07/31/2018	DFB	A				0.47	Postage to date
9634.000	08/01/2018	DFB	A	300.00	2.50	2.50	750.00	Receipt/review LF Baker; Conf with Al Henson
9634.000	08/07/2018	DFB	A	300.00	0.20	0.20	60.00	Review email from Baker; PC with Al Henson
9634.000	08/08/2018	DFB	A	300.00	0.30	0.30	90.00	Telephone conference with Al Henson
9634.000	08/13/2018	DFB	A	300.00	6.00	6.00	1,800.00	Telephone conference with Al Henson; Legal research; Prepare affidavit for Al Henson; Conf with Al Henson; Prepare email to Baker and Robertson; Prepare memorandum in opposition to motion to inspect property
9634.000	08/14/2018	DFB	A	300.00	1.00	1.00	300.00	Prepare email to Judge Edwards; Finalize memorandum in opposition to motion to inspect property; Prepare for hearing; Review memorandum from Baker
9634.000	08/15/2018	DFB	A	300.00	6.00	6.00	1,800.00	Travel to and from St George for hearing; Hearing before Judge Edwards; Conf with Al Henson
9634.000	08/20/2018	DFB	A	300.00	1.00	1.00	300.00	Prepare supplemental memorandum opposing motion to inspect property; Legal research
9634.000	08/21/2018	DFB	A	300.00	1.00	1.00	300.00	Review emails from Jourdan Page; Prepare email to Page; PC with Al Henson; Revise supplemental memorandum opposing motion to inspect property
9634.000	08/22/2018	DFB	A	300.00	4.20	4.20	1,260.00	Prepare and finalize supplemental memorandum re motion to inspect; Prepare LT probate court; Prepare

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							email to Judge Edwards; Review VM from Jourdan Page; PC with Page; PC with Al Henson	
9634.000	08/22/2018	DFB	A	0.220			19.58 In house photocopies/scans to date	ARCH
9634.000	08/23/2018	DFB	A	300.00	0.70	0.70	210.00 Review files, copy, and prepare zip drive of file documents for Al Henson	ARCH
9634.000	08/29/2018	DFB	A	300.00	0.10	0.10	30.00 Review email from Baker; Prepare email to Judge Edwards; Review email from Judge Edwards; Review email from Weil	ARCH
9634.000	08/31/2018	DFB	A				8.99 Postage to date	ARCH
9634.000	09/04/2018	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from Baker with reply memorandum re motion to inspect property	ARCH
9634.000	09/20/2018	DFB	A	300.00	0.20	0.20	60.00 Review email and order from Judge Edwards re motion to inspect property	ARCH
9634.000	09/25/2018	DFB	A	300.00	1.10	1.10	330.00 Telephone conference with Al Henson; Review emails from Andrews; Prepare emails to Andrews;	ARCH
9634.000	09/27/2018	DFB	A	300.00	0.10	0.10	30.00 Receipt/review LF Baker	ARCH
9634.000	09/27/2018	DFB	A				-36.00 Void ck # 25873 dated 9/20/17 payable to Sheila Smith for witness appearance fee	ARCH
9634.000	09/28/2018	DFB	A	300.00	0.20	0.20	60.00 Prepare LT Henson	ARCH
9634.000	09/28/2018	DFB	A				2.10 Postage to date	ARCH
9634.000	09/28/2018	DFB	A				26.21 American Express 9/13/18 for lunch with client for hearing on 8/15/18(Frank Blanchard)	ARCH
9634.000	09/30/2018	DFB	A	300.00	2.50	2.50	750.00 Prepare motion to alter or amend order re inspection of property; Westlaw research	ARCH
9634.000	10/01/2018	DFB	A	300.00	3.20	3.20	960.00 Telephone conference with Al Henson; Conf with Henson; Revise and prepare motion to alter or amend; Prepare email to Judge Edwards; Prepare LT clerk of court	ARCH
9634.000	10/09/2018	DFB	A	300.00	0.10	0.10	30.00 Receipt/review response to motion to alter or amend from Baker	ARCH
9634.000	10/12/2018	DFB	A	300.00	0.10	0.10	30.00 Review order from SC Court of Appeals	ARCH
9634.000	10/16/2018	DFB	A	300.00	0.60	0.60	180.00 PC with Al Henson	ARCH
9634.000	10/18/2018	DFB	A	0.220			5.94 In house photocopies/scans to date	ARCH
9634.000	10/25/2018	DFB	A	300.00	0.10	0.10	30.00 Review emails from Robertson and Andrews	ARCH
9634.000	10/26/2018	DFB	A	300.00	0.10	0.10	30.00 Review emails from Judge Edwards, Robertson and Baker; Review order denying motion to alter or amend	ARCH
9634.000	10/29/2018	DFB	A	300.00	0.50	0.50	150.00 Telephone conference with ProCopy; PC with Al Henson	ARCH
9634.000	10/31/2018	DFB	A	300.00	0.10	0.10	30.00 Review email from Baker; Prepare email to Baker	ARCH
9634.000	10/31/2018	DFB	A				8.06 Postage to date	ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount	Ref #
Client ID 9634.000 Henson, Jr./Albert T.								
9634.000	11/02/2018	DFB	A	300.00	0.40	0.40	120.00	Telephone conference with Al HensonARCH
9634.000	11/05/2018	DFB	A	300.00	0.30	0.30	90.00	Telephone conference with Al Henson; ARCH
9634.000	11/06/2018	DFB	A	300.00	2.70	2.70	810.00	Review email from Baker Prepare documents for appendix in SC ARCH
9634.000	11/07/2018	DFB	A	300.00	2.00	2.00	600.00	Supreme Court; Prepare petition for writ of certiorari; Prepare email to Baker; Review email from Baker Prepare and revise petition for writ of certiorari ARCH
9634.000	11/08/2018	DFB	A	300.00	1.00	1.00	300.00	Prepare and finalize petition for writ of certiorari; Prepare LT SC ARCH
9634.000	11/08/2018	DFB	A				250.00	Supreme Court; Prepare and finalize appendices for petition Clerk of the SC Supreme Court, 11/8/2018, Filing fee for Petition for Writ of Certiorari (Frank Blanchard) ARCH
9634.000	11/08/2018	DFB	A	0.220			76.56	In house photocopies/scans to date ARCH
9634.000	11/10/2018	DFB	A	300.00	3.50	3.50	1,050.00	Travel to and from Summerville for site inspection; Attend site inspection of 605 North Main Street with client and opposing counsel ARCH
9634.000	11/12/2018	DFB	A	300.00	0.50	0.50	150.00	Telephone conference with Al Henson; Prepare email to Baker ARCH
9634.000	11/13/2018	DFB	A	300.00	0.10	0.10	30.00	Receipt/review VM from Henson ARCH
9634.000	11/14/2018	DFB	A	300.00	0.10	0.10	30.00	Receipt/review VM from Henson ARCH
9634.000	11/15/2018	DFB	A	300.00	0.70	0.70	210.00	PC with Henson (2x); Review motion filed by Robertson; Review emails from Robertson ARCH
9634.000	11/19/2018	DFB	A	300.00	0.10	0.10	30.00	Review email from Judge Edwards ARCH
9634.000	11/20/2018	DFB	A	300.00	2.70	2.70	810.00	PC with Al Henson; Prepare email to Robertson and Baker; Review emails from Robertson; Review email from Andrews; Conf with Al Henson ARCH
9634.000	11/21/2018	DFB	A	300.00	1.50	1.50	450.00	PC with Al Henson (2x); Prepare email to Baker; Conf with John Rosen re potential funding sources; Prepare emails to Stith; Review email from Stith; PC with Mark Weeks assistant; PC with Weeks; PC with Sherman (VM); PC with Hellman (VM) ARCH
9634.000	11/26/2018	DFB	A	300.00	1.30	1.30	390.00	Receipt/review VM from Howard Sherman; PC with Sherman (2x); PC with Al Henson (3x); Prepare emails to Andrews; Review email from Stith; Prepare email to Stith; Review emails from Andrews ARCH
9634.000	11/27/2018	DFB	A	300.00	7.50	7.50	2,250.00	Telephone conferences with Al Henson; Conf with Al Henson and Sally Buxton; Prepare email to Judge Edwards; Travel to and from St. George for hearing; Attend hearing before Judge Edwards; PC with Stith ARCH
9634.000	11/28/2018	DFB	A	300.00	4.00	4.00	1,200.00	Telephone conferences with Al ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount		Ref #
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	11/29/2018	DFB	A	300.00	5.00	5.00	1,500.00	Henson; Prepare emails to Baker and Robertson; Review emails from Robertson and Baker; PC with Stith; Prepare emails to Stith; Review emails from Stith; Review emails from Andrews; PC with Mark Weeks; Revise loan commitment terms Multiple telephone conferences with AI Henson; PC with Mark Weeks; Prepare emails to Robertson and Baker; Review emails from Baker and Robertson; Prepare emails to Andrews; Review email from Andrews; Prepare emails to Stith; Phone conferences with Stith; Revise assignment document for AI; Conf with AI Henson; Review mulitple voicemails from AI Henson	ARCH
9634.000	11/30/2018	DFB	A	300.00	5.00	5.00	1,500.00	Various telephone conferences with AI Henson; Prepare emails to Robertson and Baker; PC with Baker and Robertson; Review emails from Baker and Robertson; Review loan documents from Andrews; Prepare emails to Stith; Phone conferences with Stith; PC with Mark Weeks; Prepare documents for Mark Weeks; Prepare emails to Weeks; Review email from Edwards	ARCH
9634.000	11/30/2018	DFB	A				27.60	Postage to date	ARCH
9634.000	12/03/2018	DFB	A	300.00	3.20	3.20	960.00	Telephone conferences with AI Henson (5x); Review emails from Robertson and Baker; PC with Robertson and Baker; Prepare emails to Robertson and Baker; PC with Weeks office; Review emails from Andrews; Prepare emails to Andrews; Conf with AI Henson; Review emails from Judge Edwards; Prepare email to Edwards; PC with Stith; Prepare emails to Stith; Review emails from Stith	ARCH
9634.000	12/03/2018	DFB	A	0.220			1.54	In house photocopies/scans to date	ARCH
9634.000	12/04/2018	DFB	A	300.00	0.10	0.10	30.00	Review email and attachment from Andrews	ARCH
9634.000	12/05/2018	DFB	A	300.00	0.10	0.10	30.00	Receipt/review VM from AI Henson	ARCH
9634.000	12/06/2018	DFB	A	300.00	0.60	0.60	180.00	Prepare emails to Andrews; Review email from Andrews; Prepare email to Robertson; Review email from Robertson; PC with AI Henson;	ARCH
9634.000	12/07/2018	DFB	A	300.00	1.00	1.00	300.00	Prepare supplemental requests for production of documents in trust and estate cases; Prepare LT Robertson and Baker	ARCH
9634.000	12/07/2018	DFB	A	0.220			4.62	In house photocopies/scans to date	ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount		Ref #
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	12/10/2018	DFB	A	300.00	0.10	0.10	30.00	Review email from Trudy Robertson	ARCH
9634.000	12/17/2018	DFB	A	300.00	6.00	6.00	1,800.00	Legal research; Prepare draft of reply in support of petition for writ of certiorari in SC Supreme Court	ARCH
9634.000	12/18/2018	DFB	A	300.00	6.50	6.50	1,950.00	Prepare and draft reply in support of petition for writ of certiorari; Legal research	ARCH
9634.000	12/20/2018	DFB	A	300.00	1.50	1.50	450.00	Prepare and finalize reply in support of petition for writ of certiorari to SC Supreme Court; Prepare LT Supreme Court	ARCH
9634.000	12/31/2018	DFB	A				2.04	Postage to date	ARCH
9634.000	01/07/2019	DFB	A	300.00	0.20	0.20	60.00	Receipt/review discovery responses from Baker; Review motion to compel from Baker; Review discovery responses from Robertson	ARCH
9634.000	01/08/2019	DFB	A	300.00	0.10	0.10	30.00	Receipt/review letters and enclosures from Baker and Robertson	ARCH
9634.000	01/16/2019	DFB	A	300.00	0.30	0.30	90.00	Telephone conference with Al Henson	ARCH
9634.000	01/18/2019	DFB	A	300.00	1.20	1.20	360.00	Conference with Al Henson to prepare discovery responses; Review file	ARCH
9634.000	01/23/2019	DFB	A	300.00	0.10	0.10	30.00	Receipt/review VM from Al Henson	ARCH
9634.000	01/24/2019	DFB	A	300.00	2.00	2.00	600.00	Receipt/review VM from Al; PC with Al Henson; Prepare responses to Baker's second interrogatories and requests for production of documents	ARCH
9634.000	01/31/2019	DFB	A	300.00	0.20	0.20	60.00	Telephone conference with Al Henson	ARCH
9634.000	02/04/2019	DFB	A	300.00	0.30	0.30	90.00	Receipt/review emails from DeGolyer; Prepare email to DeGolyer; Prepare email to clerk of court	ARCH
9634.000	02/21/2019	DFB	A	300.00	0.10	0.10	30.00	Review email from DeGolyer	ARCH
9634.000	02/22/2019	DFB	A	300.00	0.30	0.30	90.00	Receipt/review order from SC Supreme Court; PC with Al Henson	ARCH
9634.000	02/25/2019	DFB	A	300.00	0.10	0.10	30.00	Receipt/review hearing notice from Baker; Review VM from Henson	ARCH
9634.000	02/26/2019	DFB	A	300.00	0.20	0.20	60.00	Receipt/review VM from Al Henson; PC with Henson	ARCH
9634.000	02/27/2019	DFB	A	300.00	2.00	2.00	600.00	Conference with Al Henson	ARCH
9634.000	03/04/2019	DFB	A	300.00	0.80	0.80	240.00	Receipt/review email from Baker's office; Prepare motion to compel; Prepare email to Judge Edwards; Prepare email to Baker and Robertson	ARCH
9634.000	03/04/2019	DFB	A	0.220			18.48	In house photocopies/scans to date	ARCH
9634.000	03/05/2019	DFB	A	300.00	0.50	0.50	150.00	Receipt/review email from DeGolyer; PC with Al Henson	ARCH
9634.000	03/13/2019	DFB	A	300.00	3.50	3.50	1,050.00	Legal research; Prepare response to Respondent's motion to tax costs in SC Supreme Court; Prepare LT Supreme Court; Prepare exhibits for response; PC with Al Henson	ARCH
9634.000	03/14/2019	DFB	A	300.00	1.50	1.50	450.00	CW Al Henson; Review notice from Burns re motions hearing on March 20, 2019	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
9634.000	03/15/2019	DFB	A	300.00	1.70	1.70	510.00	Prepare for motions hearing; Prepare ARCH proposed order re Ferri/Sands records; LR re testamentary exception to privileges	
9634.000	03/18/2019	DFB	A	300.00	5.80	5.80	1,740.00	Receipt/review documents from Al Henson (.1); Prepare and finalize discovery responses (.8); Prepare LT Baker (.2); Prepare Sharefile Link and bate-stamp documents for production (.3); Prepare email to Baker (.2); Prepare and revise proposed order re subpoenas to Ferri and Sands (1.2); Prepare emails to Judge Edwards (.2); Review motion for costs and fees on appeal (.1); Legal research re effect of untimely motion for costs (.3); Prepare return to motion (1.8); Prepare LT SC Court of Appeals (.1); Prepare affidavit in support request for attorneys' fees (.5)	ARCH
9634.000	03/19/2019	DFB	A	300.00	0.70	0.70	210.00	Receipt/review multiple emails from Trudy Robertson, Barry Baker and Michelle Weil; Review emails from Judge Edwards' assistant; Prepare emails to Judge Edwards' assistant; Review VM from Trudy; Review VM from Al Henson; PC with Al Henson	ARCH
9634.000	03/20/2019	DFB	A	300.00	2.00	2.00	600.00	Telephone conferences with Barry Baker and Trudy Robertson; PC with Baker; PC with Al Henson; Prepare email to clerk's office re hearing and resolution of motions; Review emails from Wooten, Baker, and Robertson	ARCH
9634.000	03/29/2019	DFB	A				21.15	Postage to date	ARCH
9634.000	04/01/2019	DFB	A	300.00	0.40	0.40	120.00	Prepare corrected proof of service (.1); Prepare LT Court of Appeals (.1); Review return to motion for sanctions filed by Robertson (.1); Review reply in support of motion for costs filed by Robertson (.1)	ARCH
9634.000	04/01/2019	DFB	A				50.00	Clerk of South Carolina Court of Appeals, 4/1/2019, Filing fee for motion (Frank Blanchard)	ARCH
9634.000	04/01/2019	DFB	A	0.220			2.20	In house photocopies/scans to date	ARCH
9634.000	04/09/2019	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email from Baker and attachments	ARCH
9634.000	04/18/2019	DFB	A	300.00	1.50	1.50	450.00	Review files for communications with Anthony Stith for production; Prepare Stith communications for production	ARCH
9634.000	04/19/2019	DFB	A	300.00	0.50	0.50	150.00	Prepare LT Baker and Robertson; Prepare email to Baker and	ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.								
							Robertson; Prepare electronic production of Stith communications	
9634.000	04/30/2019	DFB	A				1.80 Postage to date	ARCH
9634.000	05/01/2019	DFB	A	300.00	0.10	0.10	30.00 Review email from Judge Edwards's clerk	ARCH
9634.000	05/02/2019	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from Barry Baker	ARCH
9634.000	05/03/2019	DFB	A	300.00	1.30	1.30	390.00 Prepare revised order disposing of pending motions; Prepare email to Baker and Robertson; Prepare email to Judge Edwards' clerk	ARCH
9634.000	05/06/2019	DFB	A	300.00	0.40	0.40	120.00 Review email and revised order from M. Weil	ARCH
9634.000	05/13/2019	DFB	A	300.00	0.40	0.40	120.00 Conference with Savannah Pugh to discuss legal research for motion to consolidate	ARCH
9634.000	05/17/2019	DFB	A	300.00	0.50	0.50	150.00 Review email from Baker; Prepare email to Baker	ARCH
9634.000	05/20/2019	DFB	A	300.00	0.10	0.10	30.00 Review emails from Robertson and Baker	ARCH
9634.000	05/21/2019	DFB	A	300.00	0.60	0.60	180.00 Receipt/review emails from Baker re proposed order on testamentary exception; Prepare email to Baker	ARCH
9634.000	05/24/2019	DFB	A	300.00	0.10	0.10	30.00 Receipt/review memo from Pugh re consolidation motion	ARCH
9634.000	05/29/2019	DFB	A	300.00	0.10	0.10	30.00 Receipt/review Savannah Pugh research memo re motion to consolidate	ARCH
9634.000	05/31/2019	DFB	A	300.00	0.10	0.10	30.00 Review order on costs from SC Court of Appeals	ARCH
9634.000	06/03/2019	DFB	A	300.00	0.50	0.50	150.00 Prepare LT AI re SCCA order on costs; Review possible challenges to order	ARCH
9634.000	06/06/2019	DFB	A	300.00	0.10	0.10	30.00 Receipt/review emails from Weil and Robertson	ARCH
9634.000	06/07/2019	DFB	A	300.00	0.20	0.20	60.00 Receipt/review emails from clerk of court; Prepare email to clerk of court	ARCH
9634.000	06/12/2019	DFB	A	300.00	0.10	0.10	30.00 Receipt/review notice of motions hearing	ARCH
9634.000	06/13/2019	DFB	A	300.00	0.50	0.50	150.00 Revise proposed order re Sands and Ferri documents; Prepare email to Baker	ARCH
9634.000	06/17/2019	DFB	A	300.00	0.10	0.10	30.00 Receipt/review email from Weil	ARCH
9634.000	06/27/2019	DFB	A	300.00	0.10	0.10	30.00 Conference with E. Ford re legal research assignment	ARCH
9634.000	06/30/2019	DFB	A				0.50 Postage to date	ARCH
9634.000	07/02/2019	DFB	A	300.00	0.10	0.10	30.00 Receipt/review emails from court, Robertson, and Baker	ARCH
9634.000	07/03/2019	DFB	A	300.00	0.30	0.30	90.00 Receipt/review emails from Weil; PC with AI Henson	ARCH
9634.000	07/08/2019	DFB	A	300.00	0.10	0.10	30.00 Telephone conference with Dorchester Cty clerk of court	ARCH
9634.000	07/09/2019	DFB	A				24.00 Thomas Reuters, Invoice # 840588518	ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount	Ref #
Client ID 9634.000 Henson, Jr./Albert T.								
							7/1/19, Computer research for June, (Frank Blanchard)	
9634.000	07/10/2019	DFB	A	300.00	0.40	0.40	120.00	Receive emails from Baker; Prepare email to Baker; PC with Al Henson; Review email from Burns ARCH
9634.000	07/11/2019	DFB	A	300.00	4.00	4.00	1,200.00	Prepare memo in opposition to motion to consolidate cases for trial; Legal research for memo; Review emails from Baker and DeGolyer ARCH
9634.000	07/12/2019	DFB	A	300.00	5.00	5.00	1,500.00	Prepare memo in opposition to motion to compel re Sands/Ferri subpoenas; Prepare email to Judge Edwards; PC with Al Henson ARCH
9634.000	07/14/2019	DFB	A	300.00	2.30	2.30	690.00	Prepare for motions hearing; Prepare outline for hearing; Review email from Weil with memoranda ARCH
9634.000	07/15/2019	DFB	A	300.00	5.50	5.50	1,650.00	Travel to and from St George for motions hearing; Attend motions hearing; Conf with Al Henson ARCH
9634.000	07/16/2019	DFB	A	300.00	0.50	0.50	150.00	Legal research re case law on application of attorney-client privilege to communications by agent of principal with attorney ARCH
9634.000	07/17/2019	DFB	A	300.00	0.40	0.40	120.00	Telephone conference with Al Henson ARCH
9634.000	07/18/2019	DFB	A	300.00	0.50	0.50	150.00	Receipt/review LF Probate Court; Prepare motion for extension to file accounting in probate court; Prepare LT probate court; Prepare LT client; Review VM from Henson ARCH
9634.000	07/18/2019	DFB	A	0.220			5.94	In house photocopies/scans to date ARCH
9634.000	07/19/2019	DFB	A	300.00	0.50	0.50	150.00	Prepare email to Judge Edwards ARCH
9634.000	07/21/2019	DFB	A	300.00	0.10	0.10	30.00	Receipt/review email and attachments from Weil ARCH
9634.000	07/22/2019	DFB	A	300.00	0.80	0.80	240.00	Prepare LT Judge Edwards; Review email from Weil ARCH
9634.000	07/31/2019	DFB	A				16.70	Postage to date ARCH
9634.000	08/06/2019	DFB	A	300.00	0.40	0.40	120.00	Telephone conference with Al Henson ARCH
9634.000	08/07/2019	DFB	A	300.00	3.00	3.00	900.00	Prepare probate forms for inventory and accounting; review files to locate information on estate receipts and expenses; Conf with Al Henson ARCH
9634.000	08/09/2019	DFB	A	300.00	3.00	3.00	900.00	Prepare and revise probate forms; Telephone conference with Al Henson; Conf with Al Henson ARCH
9634.000	08/21/2019	DFB	A				25.84	Thomas Reuters West payment Center, Invoice #840412955 6/1/19, Computer Research for May 2019 (Frank Blanchard) ARCH
9634.000	08/31/2019	DFB	A				0.65	Postage to date ARCH
9634.000	09/13/2019	DFB	A	300.00	0.50	0.50	150.00	Review orders from Judge Edwards; Review email from Edwards; Review email from M. Weil; Prepare package to Al Henson; Review VM from Henson; ARCH

<u>Client</u>	<u>Trans Date</u>	<u>Tkpr</u>	<u>H P</u>	<u>Rate</u>	<u>Hours Worked</u>	<u>Hours to Bill</u>	<u>Amount</u>		<u>Ref #</u>
Client ID 9634.000 Henson, Jr./Albert T.									
								Review emails from D. Delgoyer	
9634.000	09/16/2019	DFB	A	300.00	0.10	0.10	30.00	Review email from Michelle Weil	ARCH
9634.000	09/17/2019	DFB	A	300.00	1.20	1.20	360.00	Telephone conference with Al Henson;	ARCH
								Telephone conference with Donna Sands; Prepare email to Sands;	
								Telephone conference with Kathleen Ferri; Prepare email to Ferri	
9634.000	09/18/2019	DFB	A	300.00	0.80	0.80	240.00	Prepare draft of consent scheduling order; Prepare email to Baker and Robertson	ARCH
9634.000	09/19/2019	DFB	A	300.00	1.00	1.00	300.00	Telephone conference with Al Henson; Telephone conference with Donna Sands; Revise consent scheduling order; Prepare email to Baker and Robertson;	ARCH
9634.000	09/23/2019	DFB	A	300.00	0.80	0.80	240.00	Review emails from Judge Edwards; Review email from Robertson; Prepare emails to Judge Edwards; Review documents from Donna Sands; Prepare package to send to Al Henson; Review email from Weil	ARCH
9634.000	09/30/2019	DFB	A	300.00	0.10	0.10	30.00	Review VM from Al Henson	ARCH
9634.000	10/01/2019	DFB	A	300.00	0.20	0.20	60.00	Telephone conference with Al Henson; Review email from Burns in probate court and attachments	ARCH
9634.000	10/02/2019	DFB	A	300.00	2.20	2.20	660.00	Conference with Al Henson	ARCH
9634.000	10/14/2019	DFB	A	300.00	0.30	0.30	90.00	Review motion and enclosures filed by Baker; Prepare package to Al Henson	ARCH
9634.000	10/17/2019	DFB	A	300.00	0.10	0.10	30.00	Review VM from Al Henson	ARCH
9634.000	10/21/2019	DFB	A	300.00	0.60	0.60	180.00	Telephone conference with Al Henson; Review VM from Henson	ARCH
9634.000	10/23/2019	DFB	A	300.00	0.70	0.70	210.00	Review emails from M. Burns in probate court; Review emails from Weil, DeGolyer, and Robertson; Prepare email to Burns; Prepare motion to withdraw; Prepare Letter to Henson	ARCH
9634.000	10/24/2019	DFB	A	300.00	0.50	0.50	150.00	Review email from Burns with notice of hearing; Prepare Letter to probate court; Prepare Letter to Henson	ARCH
9634.000	10/28/2019	DFB	A	300.00	0.10	0.10	30.00	Review email from Burns; Prepare email to Burns	ARCH
9634.000	11/01/2019	DFB	A	300.00	0.10	0.10	30.00	Review VM from Henson; Review email from Andrews	ARCH
9634.000	11/05/2019	DFB	A	300.00	0.20	0.20	60.00	Review emails from Ashley Andrews; Prepare email to Andrews; Prepare email to E. Mahoney	ARCH
9634.000	11/06/2019	DFB	A	300.00	0.10	0.10	30.00	Review emails from Mahoney; Review email from A. Andrews	ARCH
9634.000	11/07/2019	DFB	A	300.00	1.00	1.00	300.00	Telephone conference with Al Henson; Review email from A. Andrews; Prepare email to Andrews	ARCH

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount	Ref #
Client ID 9634.000 Henson, Jr./Albert T.								
9634.000	11/08/2019	DFB	A	300.00	0.10	0.10	30.00	Review email from Ashley Andrews ARCH
9634.000	11/11/2019	DFB	A	300.00	1.00	1.00	300.00	Telephone conference with Al HensonARCH
9634.000	11/13/2019	DFB	A	300.00	0.50	0.50	150.00	Prepare files and thumb drive of records for Al Henson to pick up ARCH
9634.000	11/15/2019	DFB	A	300.00	0.50	0.50	150.00	Conference with Al Henson ARCH
9634.000	11/18/2019	DFB	A	300.00	0.20	0.20	60.00	Review email from Baker and motion for environmental study ARCH
9634.000	11/19/2019	DFB	A	300.00	0.50	0.50	150.00	Telephone conference with Al Henson; Review emails from Baker, Weil, Robertson, and Judge Edwards; Telephone conference with Al Henson ARCH
9634.000	11/20/2019	DFB	A	300.00	5.50	5.50	1,650.00	Prepare for motions hearing; Prepare proposed order on motion to withdraw; Travel to and from St George for motions hearing; Telephone conference with Al Henson; Conf with Baker; Conf with Judge Edwards assistant; Conf with Al Henson; Review email and order from Judge Edwards ARCH
9634.000	11/21/2019	DFB	A	300.00	0.30	0.30	90.00	Prepare email to Judge Edwards; Review VM from Al; Conf with E. Mahoney ARCH
9634.000	11/22/2019	DFB	A	300.00	0.50	0.50	150.00	Telephone conference with Al HensonARCH
9634.000	11/25/2019	DFB	A	300.00	0.30	0.30	90.00	Review order and email from Judge Edwards; Prepare email to Edwards; Prepare Letter to Henson; ARCH
9634.000	12/31/2019	DFB	A				0.00	2019 YE Write off Advances of \$8695.54 and Expenses of 773.04 ARCH
Subtotal for Timekeeper DF								
					Billable	575.50	575.50	185,479.05 Daniel F. Blanchard
					Non-billable	0.00	0.00	553.74
					Total	575.50	575.50	186,032.79
9634.000	06/28/2019	ECF	A	125.00	0.20	0.20	25.00	Legal research - pulling cases from Westlaw from an Order and saved to G drive ARCH
Subtotal for Timekeeper EC								
					Billable	0.20	0.20	25.00 Emily C. Ford
9634.000	06/10/2016	CI	A	100.00	0.30	0.30	30.00	Draft subpoenas (Hearing) for Richard Scott Henson and Vann Kenneth Henson and service letter to Attorney Robertson ARCH
9634.000	06/14/2016	CI	A	100.00	1.00	1.00	100.00	Brief review and scanning documents received from Atty Reeves ARCH
9634.000	06/15/2016	CI	A	100.00	0.10	0.10	10.00	Brief review and scanning documents received from Moore & Van Allen ARCH
9634.000	06/30/2016	CI	A	125.00	2.70	2.70	337.50	Legal research of whether beneficiary of trust can assert dead man statute ARCH
9634.000	07/01/2016	CI	A	125.00	5.00	5.00	625.00	Legal research of whether ARCH

ROA 0125

Client	Trans Date	Tkpr	H P	Rate	Hours Worked	Hours to Bill	Amount	Ref #
Client ID 9634.000 Henson, Jr./Albert T.								
9634.000	07/05/2016	CI	A	125.00	3.00	3.00	375.00	beneficiary of trust can assert dead man statute Legal research of whether beneficiary of trust can assert dead man statute ARCH
9634.000	06/28/2018	CI	A	125.00	0.50	0.50	62.50	Legal research on the prejudgment interser rate changes since 1988. ARCH
9634.000	06/29/2018	CI	A	125.00	1.30	1.30	162.50	Legal research on the prejudgment interest rate statute. I had to go to the Charleston School of Law Library to locate the older versions of the statute to compare changes made. The copies were given to Frank. ARCH
9634.000	06/29/2018	CI	A	125.00	1.30	1.30	162.50	Legal research with Taylor Currin at the Charleston School of Law regarding the statutorial changes of law for pre/post judgment interest rates. ARCH
9634.000	05/15/2019	CI	A	125.00	1.10	1.10	137.50	Reviewed case file and began reviewing relevant cases in order to be able to begin legal memo on FRCP Rule 42 ARCH
9634.000	05/16/2019	CI	A	125.00	0.90	0.90	112.50	Legal research into dead man's statute as well as FRCP 42 ARCH
9634.000	05/20/2019	CI	A	125.00	0.60	0.60	75.00	Began legal reserarch into motion oppoing consoloidation ARCH
9634.000	05/24/2019	CI	A	125.00	3.50	3.50	437.50	Legal research regarding consolidation ARCH
Subtotal for Timekeeper CI					Billable	21.30	21.30	2,627.50 Combined Inactive
Total for Client ID 9634.000					Billable	598.20	598.20	188,281.55 Henson, Jr./Albert T.
					Non-billable	0.00	0.00	553.74 Richard S. Henson, et al v. Albert T. Hens
					Total	598.20	598.20	188,835.29
GRAND TOTALS								
					Billable	598.20	598.20	188,281.55
					Non-billable	0.00	0.00	553.74
					Total	598.20	598.20	188,835.29

Debbie Hill

From: Debbie Hill
Sent: Thursday, May 26, 2022 11:26 AM
To: Dickson, Edgar W. Law Clerk (Jessica Thompson); Dickson, Edgar W. Secretary (Catherine C. Wilson)
Cc: F. Truett Nettles II; a Pitt
Subject: Rosen Hagood, LLC v. Albert T. Henson, Jr.; 2020-CP-18-02003
Attachments: Memorandum of Law in Support of Motion for Summary Judgment

Dear Judge Dickson:

In preparation for the Motion for Summary Judgment hearing in this matter being held Wednesday, June 1, 2022 at 2:00 p.m., attached please find Plaintiff's Memorandum of Law in Support of Motion for Summary Judgment.

The Defendant, Albert T. Henson, Jr. is being served via copy of this email, as well as U.S. Mail.

Please let us know if you need additional information.

Regards,
Debbie Hill



Debbie Hill

|Legal Assistant to F. Truett Nettles, II & Frank Blanchard|

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CIRCULAR 230 DISCLOSURE

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2020-CP-18-2003
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	MEMORANDUM OF LAW
	)	IN SUPPORT OF MOTION FOR
vs.	)	SUMMARY JUDGMENT
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
	)	

The Plaintiff, ROSEN HAGOOD, LLC, has moved for Summary Judgment pursuant to Rule 56 of the South Carolina Rules of Civil Procedure. This motion for Summary Judgment is based on pleadings of the parties, an affidavit of the Plaintiff, deposition testimony of the Defendant and the Defendant's admission as to the letter of representation and contract.

The Defendant in this case has appeared in *pro se* and has drafted and filed his own Answer. In that responsive pleading, the Defendant generally denies certain paragraphs in the Complaint. However, in his Answer, the Defendant does not allege any specific facts which are contrary to the allegations of the Complaint. The Defendant's affirmative defense of statute of limitations is addressed in the Plaintiff's supporting Affidavit. The pleadings of the Defendant, without more, are not sufficient to oppose a summary judgment. Rule 56(e) SCRPC; Thompkins v. Festival Centre Group, 306 S.C. 193, 410 S.E. 2d 593 (Ct. of Appeals 1991).

The terms of legal representation of the Defendant by the Plaintiff are set forth in a letter of representation, a copy of which is attached to the motion. In discovery, the Defendant admitted the genuineness of the letter of representation and that it was signed by the Defendant himself. See Exhibit 3

Certain portions of the Defendant's deposition are also offered in support of this Motion for Summary Judgment. On pages 13, 14 and 15 of the deposition, the Defendant admitted that the letter of representation was the agreement between the parties and the Defendant agreed to pay the attorney, Daniel Frank Blanchard, III, three hundred dollars (\$300.00) per hour for legal representation. On pages 16 and 17 (page 16, lines 17 – 25 and page 17, lines 1 -2) of the deposition the Defendant admitted that he agreed to pay the Plaintiff "whatever the ultimate outcome of the matter." (Pages 16 and 17 are attached hereto). While the Defendant had a right under the letter of representation and contract to terminate the Plaintiff as legal counsel at any time, on page 22 of the deposition, the Defendant admitted that he never terminated the Plaintiff as his lawyer (page 22, lines 7 – 9). On the very next page of the deposition, the Defendant admits that he has not paid fees and charges to the Rosen Hagood law firm up until the point where the court relieved the Plaintiff as legal representative (page 23, lines 13 – 15). When asked at deposition which part of the legal bill submitted by the Plaintiff to the Defendant was not owed to the Plaintiff, the Defendant said "I don't really know." (page 39, lines 21 – 25 and page 40, lines 1 – 10). At a final hearing before the presiding Probate Judge in the underlying trust case, the Court divided the corpus of the trust equally between the Defendant and his two brothers. The Defendant, being represented by other legal counsel at that time and at that hearing, did not object or appeal to that ruling.

The Plaintiff's Motion for Summary Judgment is also supported by the Affidavit of Daniel Frank Blanchard, III, Esquire, a member of the firm. The statements in that affidavit have not been controverted by the Defendant in any way.

Even when this Court views these matters in the light most favorable to the non-moving Defendant, the Defendant has not raised a genuine issue of fact which would require a trial. "In

order to resist a motion for summary judgment the non-moving party must come forward with a specific fact showing genuine issues necessitating a trial.” NationsBank v. Scott Farm, 320 S.C. 299, 465 S.E. 2d 98 (Ct. of Appeals 1995).

The Plaintiff is entitled to a Summary of Judgment as a matter of law.

May 26, 2022.
Charleston, South Carolina

Respectfully submitted,

s/ F. Truett Nettles, II
F. Truett Nettles, II, Esq.
Rosen Hagood, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
(843) 577-6726
tnettles@rosenhagood.com
Attorney for the Plaintiff

1 A Yes, sir.

2 Q And did you pay those legal fees on a monthly
3 basis?

4 A I don't know whether it was monthly, but I did
5 pay several bills.

6 Q Do you know how much you paid in all?

7 A I don't remember.

8 Q Do you remember when you stopped paying?

9 A Yes, sir.

10 Q When was that?

11 A I'm just trying to think through. I really
12 can't tell you the date, you know, what month or whatever
13 that was.

14 Q Okay. We'll come back to that, because I've
15 got some discovery things to talk about.

16 A Okay.

17 Q Look on page 3 in the second paragraph. The
18 third sentence.

19 A "You agree"?

20 Q "You agree to promptly pay or reimburse us for
21 all reasonable and necessary disbursements and other
22 charges for investigating, preparing, and presenting your
23 case and will remain responsible for payment or
24 reimbursements of these disbursements and charges,
25 whatever may be the ultimate outcome of the matter." Did

1 you agree to that?

2 A That's what it says in here, and I signed this.

3 Q Right.

4 A So yes.

5 Q So you did agree.

6 A Yes.

7 Q Now go to the next paragraph, the third
8 sentence. It says "Our monthly statements submitted for
9 our legal services are due upon receipt."

10 A Yes, sir.

11 Q Did you agree to that?

12 A Yes, sir.

13 Q Have you paid Rosen Hagood all of the money
14 they have billed you for their legal services?

15 A I don't even know what the bills were, to be
16 honest with you. I don't know the total bills that y'all
17 had.

18 Q Well, do you have any documents that would tell
19 you what you do or do not owe to Rosen Hagood?

20 A I was sent bills, yes.

21 Q Okay. Did you ever dispute those bills?

22 A Let me just stop and think.

23 Q Okay. Have you paid Rosen Hagood for all the
24 services that they've rendered to you?

25 A I would say that -- that I wasn't getting what

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2020-CP-18-2003
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	
vs.	)	CERTIFICATE OF MAILING
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
_____	)	

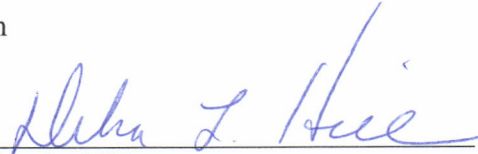
On behalf of Rosen Hagood, LLC, the Plaintiff in the above-captioned matter, I hereby certify that I am an employee of Rosen Hagood, LLC, and that I have served a copy of the below-noted documents upon the addressed below-named by placing the same in the United States Mail, proper First Class pre-paid postage affixed thereto and via electronic communication, on this 26th day of May 2022.

Documents: Plaintiff's Memorandum of Law in Support of Motion for Summary Judgment

Address: Albert T. Henson, Jr.
148 Pelzer Drive
Summerville, SC 29485

Albert T. Henson, Jr.
1131 Lazy Lane Court
Mount Pleasant, SC 29464

Email: apitt153709@yahoo.com


Debra L. Hill
Legal Assistant to F. Truett Nettles, II
Rosen Hagood, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
(843) 577-6726 (o)

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER	)	CASE NO.: 2020-CP-18-2003
	)	
ROSEN HAGOOD, LLC,	)	
	)	
Plaintiff,	)	AFFIDAVIT OF PLAINTIFF'S
vs.	)	ATTORNEY
	)	
ALBERT T. HENSON, JR.,	)	
	)	
Defendant.	)	
_____	)	

The undersigned Affiant, being duly sworn, deposes and says that:

1. As attorney for the Plaintiff, the Affiant has corresponded with the Defendant; prepared, filed and served the Summons & Complaint; conducted discovery including the deposition of Defendant; appeared in a five (5) hour mediation conference; prepared and will file this Affidavit, and proposed Order; and no unusual issues have arisen in the prosecution of this liquidated claim.

2. The undersigned Affiant and co-counsel have spent 59.4 hours on this case (total fees of \$22,664.00) and expended \$1,904.89 in costs.

3. The Affiant has practiced law as a member of the South Carolina Bar for more than 40 years in Charleston, South Carolina and practices with Rosen Hagood, LLC, and enjoys the highest professional standing for his experience, professional competency and integrity.

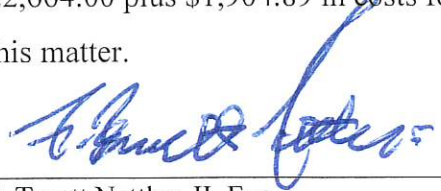
4. Attorney's fees of \$385.00 per hour are average for commercial litigation such as this.

5. This Affiant has acted promptly and proficiently in order to obtain judgment for the Plaintiff in this matter.

6. This Affiant believes that attorney's fees of \$22,664.00 plus \$1,904.89 in costs for a total of amount of \$24,568.89 due would be reasonable in this matter.

SWORN to before me this 15th
day of June, 2022.

Debra L. Hill
Notary Public for South Carolina
Printed Name: Debra L. Hill
My Commission Expires On 9-22-2030


F. Truett Nettles, II, Esq.
ROSEN HAGOOD, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
(843) 577-6726
tnettles@rosenhagood.com
Attorney for the Plaintiff

Statement Date	Amount Due	Prejudgment Interest Rate	Interest Period	Prejudgment Interest Amount
9/4/2016	\$363.68	8.75%	5.745205479	\$182.82
10/19/2016	\$3,990.00	8.75%	5.621917808	\$1,962.75
11/17/2016	\$1,530.00	8.75%	5.542465753	\$742.00
12/15/2016	\$10,410.00	8.75%	5.465753425	\$4,978.62
1/18/2017	\$6,690.00	8.75%	5.37260274	\$3,144.99
2/10/2017	\$1,530.00	8.75%	5.309589041	\$710.82
3/14/2017	\$2,040.00	8.75%	5.221917808	\$932.11
4/12/2017	\$1,320.00	8.75%	5.142465753	\$593.95
5/16/2017	\$4,740.00	8.75%	5.049315068	\$2,094.20
6/12/2017	\$11,910.00	8.75%	4.975342466	\$5,184.93
7/13/2017	\$420.00	8.75%	4.890410959	\$179.72
8/9/2017	\$5,700.00	8.75%	4.816438356	\$2,402.20
9/18/2017	\$3,600.00	8.75%	4.706849315	\$1,482.66
10/11/2017	\$6,750.00	8.75%	4.643835616	\$2,742.77
11/10/2017	\$20,850.00	8.75%	4.561643836	\$8,322.15
12/13/2017	\$6,960.00	8.75%	4.471232877	\$2,722.98
1/16/2018	\$2,580.00	8.75%	4.378082192	\$988.35
2/9/2018	\$870.00	8.75%	4.312328767	\$328.28
3/9/2018	\$30.00	8.75%	4.235616438	\$11.12
4/20/2018	\$60.00	8.75%	4.120547945	\$21.63
5/11/2018	\$3,660.00	8.75%	4.063013699	\$1,301.18
6/15/2018	\$420.00	8.75%	3.967123288	\$145.79
7/24/2018	\$3,987.50	8.75%	3.860273973	\$1,346.87
8/13/2018	\$510.00	8.75%	3.805479452	\$169.82
9/19/2018	\$6,900.00	8.75%	3.704109589	\$2,236.36
10/12/2018	\$1,260.00	8.75%	3.64109589	\$401.43
11/28/2018	\$1,440.00	8.75%	3.512328767	\$442.55
12/14/2018	\$11,520.00	8.75%	3.468493151	\$3,496.24
1/17/2019	\$5,730.00	8.75%	3.375342466	\$1,692.31
2/18/2019	\$1,230.00	8.75%	3.287671233	\$353.84
3/13/2019	\$900.00	8.75%	3.224657534	\$253.94
4/18/2019	\$4,987.50	8.75%	3.126027397	\$1,364.22
5/14/2019	\$750.00	8.75%	3.054794521	\$200.47
6/13/2019	\$1,902.50	8.75%	2.97260274	\$494.85
7/16/2019	\$505.00	8.75%	2.882191781	\$127.36
8/8/2019	\$6,150.00	8.75%	2.819178082	\$1,517.07
9/16/2019	\$1,920.00	8.75%	2.712328767	\$455.67
10/7/2019	\$1,350.00	8.75%	2.654794521	\$313.60
11/15/2019	\$1,435.00	8.75%	2.547945205	\$319.93
12/11/2019	\$3,302.50	8.75%	2.476712329	\$715.69
1/13/2020	\$25.00	8.75%	2.38630137	\$5.22
Totals	\$152,228.68			\$57,083.46

ROA 0135

F. Truett Nettles II

From: Dickson, Edgar W. Law Clerk (Jessica Thompson) <edicksonlc@sccourts.org>
Sent: Thursday, June 30, 2022 12:27 PM
To: Debbie Hill; Dickson, Edgar W. Secretary (Catherine C. Wilson)
Cc: F. Truett Nettles II; a Pitt; Becky Stevens
Subject: RE: Rosen Hagood, LLC v. Albert T. Henson, Jr.; 2020-CP-18-02003

Counsel and Mr. Henson,

On June 2, 2022, this Court took under advisement Plaintiff's Motion for Summary Judgment. After consideration of the arguments of the parties presented at the hearing, along with careful review of the memoranda and exhibits submitted by the parties, the Court finds that no genuine issue of material fact exists and Plaintiff's motion is hereby GRANTED. However, in awarding judgment and reviewing the retainer agreement between Plaintiff and Defendant, marked as Exhibit A to Plaintiff's motion, this Court finds no reference to Defendant being responsible for interest accrued on unpaid fees. Accordingly, the Court denies Plaintiff's request for \$57,083.46 in accrued interest. Moreover, this Court finds that Plaintiff is not entitled to any attorney's fees or costs accrued after November 25, 2019, the date on which Judge Edwards granted Rosen Hagood, LLC and Daniel F. Blanchard, III's motion to withdraw as counsel. According to Exhibit B of Plaintiff's motion, that would put Defendant's balance at \$158,369.96. For the foregoing reasons, Plaintiff's Motion for Summary Judgment is GRANTED and Plaintiff is entitled to \$158,369.96 in unpaid fees and expenses.

As today is Judge Dickon's last day on the bench, a Form 4 will be filed indicating the same.

Thank you,

Jessica Thompson
Law Clerk
The Honorable Judge Edgar W. Dickson
P.O. Box 1949
Orangeburg, SC 29116
P: (803)-535-2187
E: edicksonlc@sccourts.org

From: Debbie Hill <dhill@rosenhagood.com>
Sent: Thursday, May 26, 2022 11:26 AM
To: Dickson, Edgar W. Law Clerk (Jessica Thompson) <edicksonlc@sccourts.org>; Dickson, Edgar W. Secretary (Catherine C. Wilson) <edicksonsc@sccourts.org>
Cc: F. Truett Nettles II <tnettles@rosenhagood.com>; a Pitt <apitt153709@yahoo.com>
Subject: Rosen Hagood, LLC v. Albert T. Henson, Jr.; 2020-CP-18-02003

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Judge Dickson:

In preparation for the Motion for Summary Judgment hearing in this matter being held Wednesday, June 1, 2022 at 2:00 p.m., attached please find Plaintiff's Memorandum of Law in Support of Motion for Summary Judgment.

The Defendant, Albert T. Henson, Jr. is being served via copy of this email, as well as U.S. Mail.

Please let us know if you need additional information.

Regards,
Debbie Hill



Debbie Hill

|Legal Assistant to F. Truett Nettles, II & Frank Blanchard|

📍 151 Meeting Street, Suite 400
Charleston, SC 29401

Office: (843) 577-6726 | Fax: (843) 724-8036

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**Jun 15 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY  
COURT OF COMMON PLEAS  
EDGAR W DICKSON, CIRCUIT COURT JUDGE

Appellate Case No. 2022-001070

Rosen Hagood, LLC, .....Respondent/Appellant,

v.

Albert T. Henson, Jr., .....Appellant/Respondent,

**CERTIFICATE OF COUNSEL**

The undersigned hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

Respectfully submitted,

s/ Harvey M. Watson III

Desa Ballard (S.C. Bar No. 498)

Harvey M. Watson III (S.C. Bar No. 74053)

Haley Hubbard (S.C. Bar No. 103195)

BALLARD & WATSON

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ATTORNEY FOR APPELLANT/RESPONDENT

ALBERT T. HENSON JR.

May 30, 2023