

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM ORANGEBURG
COUNTY
Court of Common Pleas

Heath P. Taylor,
Circuit Court Judge

RECEIVED
DEC 20 2023
SC Court of Appeals

Case No. 2023-000564

Scottie Gordon, Appellant,

v.

Anan Hussein, Respondent.


**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON
APPEAL**

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

1. Title, deed and affidavit .
2. Copy of Bill of Sale (June 21st, 2013)and payment receipts
3. Property Tax Records
4. Building Permits with Receipts;
5. Picture of terryhowe.com Auction Sign;
6. Two (2) Letters sent by Atty Conner (November 12th &16th, 2021);
7. Letter of acceptance from SC Legal Service (March 18th, 2021);
8. Return of the Civil Appeal (March 29, 2022);
9. Case History Case 2021CV3810600057
10. Summons and Notice to Quit served November 23rd, 2021
11. Complaint & Affidavit (November 3rd, 2021).
12. Audio Recording February 16, 2022 court hearing

I certify that this designation contains no matter which is irrelevant to this appeal.

December 16, 2023

/s/ 
Scottie Gordon
569 Butler Drive
Livingston, South Carolina
29107 (803) 552-7490

STATE OF SOUTH CAROLINA,
COUNTY OF ORANGEBURG

TITLE TO REAL ESTATE

RETURN TO:
HORGER, BARNWELL & REID
POST OFFICE DRAWER 329
ORANGEBURG, SC 29116

KNOW ALL MEN BY THESE PRESENTS, That, I, **David New** in the State aforesaid for and in consideration of the sum of Five and 00/100 (\$5.00) Dollars, pursuant to Decree of Divorce (09-DR-38-1138) to him paid by **David Cody New** in the State aforesaid, have granted, bargained, sold and released, and by these presents do grant, bargain, sell and release, subject to the easements, restrictions, reservations and conditions ("Exceptions") set forth below unto the said **David Cody New**, subject to the below stated Exceptions, his heirs and assigns, all right, title and interest in of and to the following described property, to wit

All that certain piece, parcel or tract of land, situate, lying and being in School District 6, Hebron Township, Orangeburg County, South Carolina, containing 1.556 acres and being more fully and clearly shown and delineated on a plat of property surveyed for David New by W. F. Stokes, RLS, on August 29, 1994 and filed in the Office of the Register of Mesne Conveyances for Orangeburg County in Plat Book 74-S, at Page 8, said tract measuring and being bounded as follows: On the Northwest by South Carolina Highway S-38-100 and measuring thereon 196.33 feet; on the Northeast by property of Harry Cribb and measuring thereon 326.94 feet; on the Southeast by property of Carroll W. Carson, Grantor and measuring thereon 220 feet; and on the Southwest by property of Carroll W. Carson, Grantor and measuring thereon 325.63 feet.

Being the same property conveyed to David New by deed of Carroll W. Carson recorded September 22, 1994 in the office of the Register of Deeds for Orangeburg County in Deed Book 608, at Page 603.

~~TMS #0045-00-05-001~~ 0950547

~~Grantees Address: 569 Butler Street, Neeses, SC~~

THIS CONVEYANCE IS MADE SUBJECT TO: All covenants, restrictions, easements and rights-of-way affecting the property.

TITLE NOT INVESTIGATED OR CERTIFIED BY

HORGER, BARNWELL & REID, LLP

FILED Jul 02, 2010 12:52:42 pm
BOOK 01368
PAGE 0285 0287
INSTRUMENT # 2010002455
FILED ORANGEBURG COUNTY REGISTER OF DEEDS
David Lane

OFFICE OF ASSESSOR
0045-00-05-001
BLOCK 15 PARCEL 001
OF JULY 2010
COUNTY OF ORANGEBURG, COUNTY ASSESSOR

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

~~TO HAVE AND TO HOLD, subject to the above Exceptions, all and singular the premises before mentioned unto the said David Cody New, his Heirs and Assigns forever.~~

And I do hereby bind myself and my Heirs, Executors and Administrators, to warrant and forever defend all and singular the said premises, subject to the above Exceptions, unto the said David Cody New, his Heirs and Assigns, against myself and my Heirs and against every person whomsoever lawfully claiming, or to claim, the same or any part thereof.

WITNESS my Hand and Seal this 2 day of July in the year of our Lord Two thousand ten and in the two hundred and thirty-fourth year of Sovereignty and Independence of the United States of America.

Signed, Sealed and Delivered
in Presence of

Mary Kay Oliver David New
David New
[Signature]

THE STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

PERSONALLY appeared before me this undersigned witness who, in oath, says that s/he saw the within named David New sign, seal and as his Act and Deed, deliver the within written Deed, and that deponent with the other witness named above witnessed the execution thereof.

Mary Kay Oliver

SWORN to before me this 2
day of July, 2010.

[Signature] (SEAL)
Notary Public
My Commission Expires: 1/8/16

STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

AFFIDAVIT

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

1. I have read the information on this Affidavit and I understand such information.
2. The property is being transferred BY: David New TO: David Cody New' on _____.
3. Check one of the following: The DEED is
 - (a) _____ subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 - (b) _____ subject to the deed recording fee as a transfer between a corporation, a Partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as distribution to a trust beneficiary.
 - (c) EXEMPT from the deed recording fee because (exemption # _____)
(Explanation if required) _____ pursuant to Decree of Divorce _____
(If exempt, please skip items 4-6, and go to item 7 of this affidavit.)
4. Check one of the following if either item 3(a) or item 3(b) above has been checked.
 - (a) _____ The fee is computed on the consideration paid or to be paid in money or Money's worth in the amount of \$ _____.
 - (b) _____ The fee is computed on the fair market value of the realty which is \$ _____.
 - (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is \$ _____.
5. Check YES _____ or NO _____ to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If "YES" the amount of the outstanding balance of this lien or encumbrance is \$ _____.
6. The DEED Recording Fee is computed as follows:
 - (a) _____ the amount listed in item 4 above
 - (b) _____ the amount listed in item 5 above (no amount place zero)
 - (c) _____ Subtract Line 6(b) from Line 6(a) and place the result.
7. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Attorney at Law
8. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

David New
Grantor, Grantee, or Legal Representative
connected with this transaction

SWORN to before me this 2
day of July, 2016
[Signature]
Notary Public for SC
My Commission Expires: 4/12/16

1/2

~~June 21, 2013~~

David Cody New have
 in the title to real estate
 the property on 569
 1/2 Rd, Livingston, SC
 land and house
 paid in full
 Full ownership
 belongs to Scottie
 Douglas Gordon

~~Interview 6/21/13~~

~~North Jordan 6/21/13~~

signature of both parties
 witnessed by Heather New
 and Gordon
 Scottie Douglas Gordon 4/23/13

3

I received \$5000
 from Scottie Gordon
 to pay for house
 and land located
 at 569 Butler Rd
 Livingston, SC
 David M 6/21/13

2/2

CUSTOMER'S ORDER NO. 56/10/43
 NAME Arthur Gordon
 ADDRESS [REDACTED]
 CITY, STATE, ZIP [REDACTED]
 PHONE NO. [REDACTED]
 ORDER NO. [REDACTED]
 QUANTITY [REDACTED]
 UNIT PRICE [REDACTED]
 TOTAL [REDACTED]
 PAYMENT [REDACTED]
 BALANCE [REDACTED]
 BALANCE 19,000

CUSTOMER'S ORDER NO. [REDACTED]
 NAME Arthur Gordon
 ADDRESS [REDACTED]
 CITY, STATE, ZIP [REDACTED]
 PHONE NO. [REDACTED]
 ORDER NO. [REDACTED]
 QUANTITY [REDACTED]
 UNIT PRICE [REDACTED]
 TOTAL [REDACTED]
 PAYMENT [REDACTED]
 BALANCE [REDACTED]
 BALANCE 3000
 BALANCE [REDACTED]



Online Property Tax Billing & Payment System

[Customer Profile \(CustomerProfile.aspx\)](#) » [Credit Card Information \(CreditCardEntryPage.aspx\)](#) » [Confirm Purchase Information](#)

Your payment has not been processed. Please verify your payment information. If it is correct, click the Make Payment button

Order Summary

Qty	SKU	Product/Service	Price	Total
1		Tax for Notice #20121739612	\$999.26	\$999.26
		Total SC.Gov Charges		\$1,017.25

Order Information

Reference Number: 91-0045-00-05-001.000

Credit Card Information

Name on Card: Scottie Gordon

Credit Card Type: Visa

Credit Card Number: *****1506

CVV Number: ***

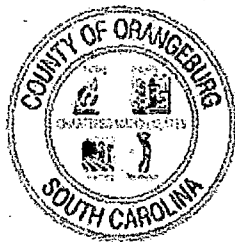
Expiration Date: 08/2014

Billing Information

[Modify address information](#)

Cardholder information

Customer Name: Scottie Gordon
 Phone: (803) 979 - 6288
 Fax: (803) 256 - 6806
 Address Line 1: 114 church street
 City: Prosperity
 State: SC
 Country: US



It's a great day in...
**ORANGEBURG
COUNTY**
We are here to serve you!

RECEIPT

NOTE: Your statement will reflect a payment to SC.Gov

Orangeburg County

Order Information

Reference Number: 91-0045-00-05-001:000-1
Order ID: 5091337
TPE Order ID: 37642886
Order Date: 8/13/2015 4:55:18 PM

Payment Method (Credit Card)

Credit Card Type: Visa
Card Number: *****8332

Billing Information

Cardholder Information

Name & Address

Shawn M Gordon
1614 Bluff Road
Columbia, SC 29201 US
Email: springsandthings@ymail.com
Phone: (803) 252 - 0170

Payment for Products or Services

SKU: Tax for Notice #20141739371
Product: Tax for Notice #20141739371
Quantity: 1
Item Price: \$822.13

SC.GOV Total: \$837.11

This online service is provided by SC.GOV, a third party, working under a contract administered by the South Carolina Budget and Control Board, Division of State Information Technology (DSIT). The online price of items or services purchased through SC.GOV, the state's official Web portal, includes funds used to develop, maintain, enhance and expand the service offerings of the state's portal.

Orangeburg County

ONLINE TAX PAYMENT

Record Information

Notice #: 039110163

Status: Paid

Date Paid: 12/01/17

Issue Date: 11/15/16

Tax Information

Name:	NEW DAVID CODY	
Tax Year:	2016	
District/Levy:	50 / 387.1	
City/Levy:	/ 0	
Total Appraisal:	103,000	
Total Assessed:	4,120	
Assessment Ratio:	Land Appraisal:	Building Appraisal:
4%	6,800	96,200

Property Information

Record Type:	Real Estate
Map Number:	00450005001000
PIN:	0950547
Acres:	1.50
Description:	569 BUTLER-DR

Taxes

County Tax:	\$1,594.85
City Tax:	\$0.00
Fees:	\$0.00
Residential Exemption:	\$903.52
Homestead Exemption:	\$0.00
Other Exemptions:	\$0.00
Local Option Credit:	\$0.00
Penalty:	\$103.70
Cost:	\$85.00
Total Taxes:	\$880.03
Total Paid:	\$880.03

Tax Sale Information

Sale Item Number:	01885
Sale Date:	12/05/16
Sale Status:	Redeemed

2/1/9

Status Date:
Bidder Name:
Redeemed By:

12/01/17
ATCF-II-SC-LLC,-MTAG_CUST
SHAWN_GORDON

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Orangeburg County

ONLINE TAX PAYMENT

Record Information

ALL DELINQUENT TAXES MUST BE SATISFIED WHEN TAXES ARE PAID.

Notice #: 052127173

Status: Sold at Tax Sale

Date Paid: 12/03/18

Issue Date: 11/22/17

Tax Information

Name:

NEW DAVID CODY

Tax-Year:

2017

District/Levy:

50 / 387.1

City/Levy:

/ 0

Total Appraisal:

103,000

Total Assessed:

4,120

Assessment Ratio:
4%

Land Appraisal:
6,800

Building Appraisal:
96,200

Property Information

Record Type:

Real Estate

Map Number:

00450005001000

PIN:

0950547

Acres:

1.50

Description:

569 BUTLER-DR AD#18-01862

Taxes

County Tax:

\$1,594.85

City Tax:

\$0.00

Fees:

\$0.00

Residential Exemption:

\$903.52

Homestead Exemption:

\$0.00

Other Exemptions:

\$0.00

Local Option Credit:

\$0.00

Penalty:

\$103.70

Cost:

\$135.00

Total Taxes:

\$930.03

Total Paid: \$930.03

Tax Sale Information

Sale Item Number:

01862

Sale Date:

12/03/18

6/9

Sale Status:

Status-Date:

Bidder Name:

Redeemed By:

00/00/00
REDROCK CAPITAL, -LLC

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(<http://www.publiqsoftware.com/index.php/legal>)

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Orangeburg County

ONLINE TAX PAYMENT

Record Information

Notice #: 604499185

Status: Paid

Date Paid: 10/16/20

Issue Date: 10/02/20

Tax Information

Name:

NEW DAVID CODY

Tax Year:

2018

District/Levy:

50 / 394.1

City/Levy:

/ 0

Total Appraisal:

103,000

Total Assessed:

4,120

Assessment Ratio:
4%

Land Appraisal:
6,800

Building Appraisal:
96,200

Property Information

Record Type:

Real Estate

Map Number:

00450005001000

PIN:

0950547

Acres:

1.50

Description:

569 BUTLER DR

Taxes

County Tax:

\$1,623.69

City Tax:

\$0.00

Fees:

\$0.00

Residential Exemption:

\$903.52

Homestead Exemption:

\$0.00

Other Exemptions:

\$0.00

Local Option Credit:

\$0.00

Total Taxes:

\$720.17

Total Paid: \$720.17

Orangeburg County

ONLINE TAX PAYMENT

Record Information

Notice #: 053463193

Status: Paid
Date Paid: 10/28/20
Issue Date: 10/25/19

Tax Information

Name:	<u>NEW-DAVID CODY</u>	
Tax Year:	<u>2019</u>	
District/Levy:	50 / 362.8	
City/Levy:	/ 0	
Total Appraisal:	<u>94,200</u>	
Total Assessed:	3,770	
Assessment Ratio:	Land Appraisal:	Building Appraisal:
4%	6,800	87,400

Property Information

Record Type:	<u>Real Estate</u>
Map Number:	<u>00450005001000</u>
PIN:	<u>0950547</u>
Acres:	1.50
Description:	<u>.569-BUTLER DR</u>

Taxes

County Tax:	\$1,367.76
City Tax:	\$0.00
Fees:	\$0.00
Residential Exemption:	\$671.06
Homestead Exemption:	\$0.00
Other Exemptions:	\$0.00
Local Option Credit:	\$0.00
Total Taxes:	<u>\$696.70</u>
Total Paid:	<u>\$696.70</u>

Orangeburg County

ONLINE TAX PAYMENT

Record Information

Notice #: 050988203

Status: Paid

Date Paid: 02/04/21

Issue Date: 11/23/20

Tax Information

Name: [REDACTED]

NEW-DAVID CODY

Tax Year: 2020

2020

District/Levy:

50 / 374.8

City/Levy:

/ 0

Total Appraisal: 94,200

94,200

Total Assessed: 3,770

3,770

Assessment Ratio:
4%

Land Appraisal:
6,800

Building Appraisal:
87,400

Property Information

Record Type: Real Estate

Real Estate

Map Number: 00450005001000

00450005001000

PIN: 0950547

0950547

Acres: 1.50

1.50

Description: 569. BUTLER-DR.

569. BUTLER-DR.

Taxes

County Tax:

\$1,413.00

City Tax:

\$0.00

Fees:

\$0.00

Residential Exemption:

\$720.07

Homestead Exemption:

\$0.00

Other Exemptions:

\$0.00

Local Option Credit:

\$0.00

Penalty:

\$20.79

Total Taxes:

\$713.72

Total Paid: \$713.72



1437 Amelia Street
 Orangeburg, SC 29116
 Ph: 803-533-6173
 Fax: 803-533-6048

Building Permit

RES/PLUM - RESIDENTIAL PLUMBING PERMIT

PERMIT NUMBER	DATE ISSUED	VALUATION	FEE	PRINTER
PR-13-1505-Neese		\$ 1100.00	\$ 30.00	LWilliam

OWNER INFORMATION

APPLICANT NAME

SCOTTIE
 GORDON

APPLICANT ADDRESS
 569 BUTLER Dr

APPLICANT PHONE
 803 979 6151

PROPERTY INFORMATION / NEW LOCATION

PROPERTY ADDRESS

569 Butler Dr

TMS #

0045-00-05-001.
 000

CONTRACTOR INFORMATION		EQUIPMENT INFORMATION	
------------------------	--	-----------------------	--

CONTRACTOR NAME
 SCOTTIE GORDON

Contractor lic. number

CONTRACTOR ADDRESS
 569 BUTLER Dr

CONTRACTOR PHONE
 803 979 6151

DESCRIPTION OF WORK
 RESIDENTIAL PLUMBING

NEW INSTALLATION

No;

ADDITION

No;

REPAIR

Yes;

WATE HEATER

No;

GAS WORK

No;

This permit becomes null and void if work or construction authorized is not commenced within six (6) months, or if construction or work is suspended or abandoned for a period of six (6) months at any time after work is started.

I hereby certify that I have read and examined this document and know the same to be true and correct. All provisions of laws and ordinances governing this type of work will be complied with whether specified herein or not. Granting of a permit does not presume to give authority to violate or cancel the provisions of any other state or local law regulating construction or the performance of construction.

Signature of Contractor or Authorized Agent

Date

Approved By

Date



Orangeburg County
 1437 Amelia Street
 Orangeburg, SC 29116

Phone: 803-533-6173
 Fax: 803-533-6048

Paid Invoice

ACCOUNT:
SCOTTIE GORDON 569 BUTLER Dr NEESES SC 29107 Phone: 803 979 6151

DATE	INVOICE #
8/19/2013	2013-01545
PAID DATE	8/19/2013

PERMIT NUMBER	PR-13-1505-Neese
569 Butler Dr Neeses, SC 29107	

Date	Status	Payment	Amount
8/19/2013	Original Due		30.00
8/19/2013	Paid	Cash	(-) 30.00

Total Paid	30.00
-------------------	--------------

Orangeburg County Building Permit

Project Address:	569 Butler Dr
Planning Permit:	PR-13-1505-Neese
Contractor:	SCOTTIE GORDON
Contractor Phone:	803 979 6151

Tax Map Number: 0045-00-05-001.000

<u>Type of Inspection</u>	<u>Pass Yes/No</u>	<u>Inspector's Initials</u>	<u>Date</u>

James D. Wiggins

Orangeburg County Building
Telephone: (803) 533-6173

Fax: (803)

Signature



1437 Amelia Street
 Orangeburg, SC 29116
 Ph: 803-533-6173
 Fax: 803-533-6048

Building Permit

RES/ELEC - RESIDENTIAL ELECTRICAL PERMIT

PERMIT NUMBER	DATE ISSUED	EVALUATION	PERMITTED BY
EL-13-1504-Neese		\$ 5000.00	LWilliam

OWNER INFORMATION

PROPERTY INFORMATION / NEW LOCATION

APPLICANT NAME

SCOTTIE
 GORDON

PROPERTY ADDRESS

569 Butler Dr

APPLICANT ADDRESS

569 BUTLER Dr

TMS #

0045-00-05-001.
 000

APPLICANT PHONE

803 979 6151

CONTRACTOR INFORMATION	EQUIPMENT INFORMATION
------------------------	-----------------------

CONTRACTOR NAME

SCOTTIE GORDON

Contractor lic. number

AMPERAGE OF SERVICE

200 A;

CONTRACTOR ADDRESS

569 BUTLER Dr

METER RELOCATION

No;

CONTRACTOR PHONE

803 979 6151

DESCRIPTION OF WORK

RESIDENTIAL ELECTRICAL

REWIRE

No;

MBH SERVICE POLE

No;

SAW POLE

This permit becomes null and void if work or construction authorized is not commenced within six (6) months, or if construction or work is suspended or abandoned for a period of six (6) months at any time after work is started.

I hereby certify that I have read and examined this document and know the same to be true and correct. All provisions of laws and ordinances governing this type of work will be complied with whether specified herein or not. Granting of a permit does not presume to give authority to violate or cancel the provisions of any other state or local law regulating construction or the performance of construction.

Signature of Contractor or Authorized Agent

Date

Approved By

Date



Orangeburg County
 1437 Amelia Street
 Orangeburg, SC 29116

Phone: 803-533-6173
 Fax: 803-533-6048

Paid Invoice

ACCOUNT:
SCOTTIE GORDON 569 BUTLER Dr NEESES SC 29107 Phone: 803 979 6151

DATE	INVOICE #
8/19/2013	2013-01544
PAID DATE	8/19/2013

PERMIT NUMBER	EL-13-1504-Neese
569 Butler Dr Neeses, SC 29107	

Date	Status	Payment	Amount
8/19/2013	Original Due		45.00
8/19/2013	Paid	Cash	(-) 45.00

Total Paid	45.00
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Save Time & Money with Online Permits and Inspections. Go To: www.buildingdepartment.com

Orangeburg County Building Permit

Project Address:	569 Butler Dr
Electrical Permit No.	EL-13-1504-Neese
Contractor Name:	SCOTTIE GORDON
Contract Telephone No.	803 979 6151

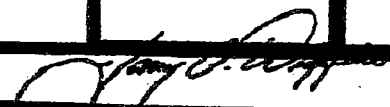
Tax Map Number: 0045-00-05-001.000

<u>Type of Inspection</u>	<u>Pass Yes/No</u>	<u>Inspector's Initials</u>	<u>Date</u>
---------------------------	--------------------	-----------------------------	-------------

Slab			
Underground			
Safety			
Rough-in			
Temporary Power			
Final			

Orangeburg County Building
Telephone: (803) 533-6173

Fax: (803)



 Signature

AUCTION

This Property & Others

Online Bidding:

terryhowe.com

Terry Howe & Associates, Inc. | 864.268.4399 | SCFL 3471, NCFI 7677, GA ACNR 002329 | Charles Howe, BIC, Managing Broker

BILL CONNOR LAW FIRM, LLC

ATTORNEY AT LAW

William M. Connor, V
AV Preeminent ®

1408 Russell Street, Suite 11
Orangeburg SC 29115
office@billconnorlaw.com

Telephone: (803) 937-5571
Facsimile: (803) 937-6647

November 12, 2020

Matthew Klein
Redrock Capital
VIA EMAIL: mcklein@clemson.edu

Dear Mr. Klein:

I was retained by Mrs. Shawn Gordon to assist her with an immediate property issue that involves your company, Redrock Capital, LLC. She purchased her home at 569 Butler Dr., Livingston SC from Mr. David Cody New in 2013. Unfortunately, Mrs. Gordon discovered that Mr. New never properly recorded the title to the home in her name. She is disabled, with three children she homeschools. Though Mrs. Gordon paid taxes on the home, it was put up for tax auction in 2018, when I understand your company purchased the property. Because Mrs. Gordon was not the owner of Title, she did not receive the notices about the tax sale until it was too late. She has now discovered your company putting the home up for auction, and that is why she hired me.

I have explained the difficult legal position Mr. New has caused Mrs. Gordon in not properly recording the Deed of the real estate she purchased. Mrs. Gordon just contacted us about helping, so I am researching case law about her situation and options to keep her home. I wanted to reach out to you in hopes of a potential resolution of this matter in which Mrs. Gordon and her children can remain in the home. On her behalf, I ask that

Matthew Klein

November 12, 2020

Page 2

you consider taking the home off auction, and for us to attempt to discover a way for Mrs. Gordon to purchase the home. She can pursue her legal options against Mr. New separately. Again, she is severely disabled and is not in a realistic position to move with her children right now. Please contact me to see if we can come to a resolution of this matter. Thank you.

Sincerely,



William M. Connor, V





FW: Redrock Capital, LLC

1 message

<shirley.moody@billconnorlaw.com>

Fri, Mar 5, 2021 at 12:09 PM

To: Scott&Shawn Gordon <golddiggers247@gmail.com>

Shirley H. Moody, Paralegal for Attorney Bill Connor,

Bill Connor Law Firm, LLC

1408 Russell Street, Suite 11, Orangeburg, SC 29115

Phone: 803-937-5571 / Fax: 803-937-6647

BillConnorLaw.com

Confidentiality Notice:

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From: bill@billconnorlaw.com <bill@billconnorlaw.com>

Sent: Monday, November 16, 2020 2:40 PM

To: shirley.moody@billconnorlaw.com; MCKLEIN@clemson.edu

Cc: DOUGLAS.THOMAS@billconnorlaw.com

Subject: RE: Redrock Capital, LLC

Mr. Klein,

My clients, Mr. and Mrs. Gordon, who purchased the property at 569 Butler Dr., Livingston SC in 2013 (the prior owner failed to register the Deed), came by my office today. They are providing the contract of

sale of the home from 2013. I understand the auction of that property for Redrock Capital finishes tomorrow, and am attempting to communicate before having to submit a court filing for the Gordons' interest in the property. They are willing to resolve this matter, and request you please reach out today. My number is below. Thank you.

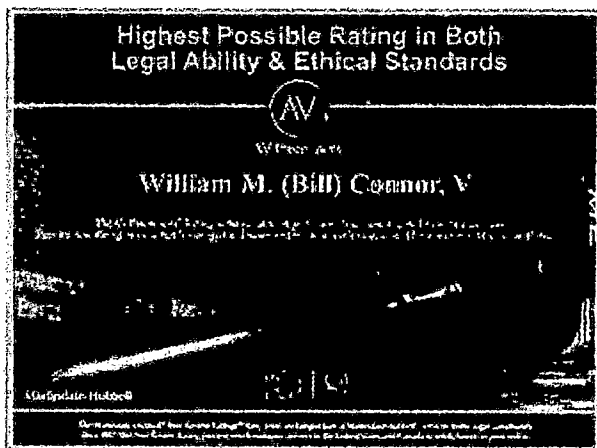
Sincerely,
Bill

Attorney Bill Connor

BILL CONNOR LAW FIRM, LLC

1408 RUSSELL STREET, SUITE 11, ORANGEBURG SC 29115

P 803-937-5571 | F 803-937-6647





126 Associate Parkway (29118) | P.O. Box 1646 | Orangeburg, South Carolina 29116
Phone: (803) 533-0116 | Fax: (803) 531-5102
www.sclegal.org | www.lawhelp.org/sc | www.probono.net/sc

March 18, 2021

SHAWN Z GORDON
569 BUTLER DRIVE
LIVINGSTON, SC 29107

Re: #62 Homeownership/Real Property

Our File No.: 21-0691512

Dear Ms. Gordon:

The purpose of this letter is to advise you that your case has been accepted by South Carolina Legal Services and has been assigned to attorney, **Cable Poag**, to provide you with legal assistance. We will evaluate the merits of your case to determine whether we can provide extended or limited services. Please disregard this letter if you have already made contact with your attorney.

Upon receipt of this letter, please call to make an appointment with the attorney assigned to your case to discuss the information you provided to our intake staff. When you come in, please bring in any papers you have that will verify your income and anything that is related to your case. When you meet, we will try to inform you of what steps we can take to represent your interests.

If we do not hear from you within ten (10) days of the date of this letter, we will assume you have resolved the matter on your own and your file will be closed.

We look forward to working with you on your case.

Sincerely,

Keshia D. Shuler-Johnson
Paralegal

THIS LETTER DOES NOT MEAN THIS IS AN AGREEMENT TO REPRESENT YOU IN COURT OR TO START LEGAL PROCEEDINGS FOR YOU; RATHER THIS LETTER MEANS AN AGREEMENT TO MEET WITH YOU AND ASSESS YOUR CURRENT SITUATION AND S. C. LEGAL SERVICES' ABILITY TO MEET YOUR NEEDS.



STATE OF SOUTH CAROLINA)
)
COUNTY OF ORANGEBURG)
)
Anan Hussein,)
)
Plaintiff,)
)
-vs-)
)
David Cody New,)
)
Defendant.)
_____)

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT

SUMMONS

CASE NO.: 2021-CV-38-10600056

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 subscribed, Michael C. Tanner, L.L.C., at his office at 392 Second Street. Post Office Box 1061, Bamberg, South Carolina, 29003, within thirty (30) days after service hereof, exclusive of the day of such service; and, if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

Dated at Bamberg, South Carolina, on the 18th day of June, 2021.

MICHAEL C. TANNER, L.L.C.

By: s/Michael C. Tanner

Michael C. Tanner, SC Bar 12424
P. O. Box 1061
Bamberg, SC 29003
Attorney for Plaintiff
(803) 245-9153
michaelctannerllc@bellsouth.net

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF ORANGEBURG)	Case No.: 2021-CV-38-10600056
)	
Anan Hussein,)	
)	
Plaintiff,)	
)	
vs.)	COMPLAINT
)	
David Cody New,)	
)	
Defendant.)	
)	

The Plaintiff, complaining of the Defendant, would respectfully show unto this Court:

FOR A FIRST CAUSE OF ACTION

1. The Plaintiff, Anan Hussein, owns real property and improvements located at 569 Butler Drive, Livingston, SC 29107 in Orangeburg County, South Carolina.
2. The Defendant named herein does not have a lease or rental agreement with the Plaintiff in the property which is the subject of this action, which property is located in Orangeburg County, South Carolina.
3. The Plaintiff alleges that the Defendant is illegally residing inside the home which is the subject of this action.
4. This is an action for eviction of the Defendant of subject property located and situated in Orangeburg County, South Carolina. Defendant has no permission to live in the home and has not tendered rent.
5. Plaintiff is the holder of the Deed to the property.
6. The notice of Consumer's Right to Cure, as contemplated under S.C. Code South Carolina Ann. Section 37-5-110 and 37-5-111, as amended is not required in this

matter. Defendant is not entitled to any Protection under the CARES Act.

SECOND CAUSE OF ACTION

7. Defendant has no legal claim to subject property.
8. Plaintiff is the owner of subject property.
9. Plaintiff is entitled to immediate possession of subject property as Defendant is a squatter and has no legal title to the property.
10. Plaintiff requests Defendant be held financially responsible for any and all damages to subject property.
11. The property has not been taken for any tax, fine or assessment.
12. Defendant is improperly withholding said property from Plaintiff.

WHEREFORE, Plaintiff prays:

- a) The Plaintiff be awarded a personal or deficiency judgment against the Defendant;
- b) An Order ejecting Defendant from the property.
- c) Return the property to Plaintiff, and;
- d) For such other and further relief as may be just and proper.

MICHAEL C. TANNER, L.L.C.

s/Michael C. Tanner
Michael C. Tanner, SC Bar 12424
Post Office Box 909
Bamberg, SC 29003
803-245-5178
Attorney for Plaintiff
michaelctannerllc@bellsouth.net

November 3, 2021

Bamberg, SC

Received
Orangeburg County

NOV 03 2021

Western Region
Magistrate Office

AE

STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

)
)
)
)
)
)

2021-CV-38-10600057
CIVIL CASE NUMBER

AFFIDAVIT
SUMMARY EJECTMENT OF TRESPASSER

Anan Hussein _____

Plaintiff

Vs

David Cody New _____


Defendant

Plaintiff, Anan Hussein appearing before me states that s/he is the Owner/Agent of the premises within the jurisdiction of the WESTERN MAGISTRATE COURT, which is located at 6357 SAVANNAH HIGHWAY, P.O. BOX 387 NEESES, SC 29107.

Plaintiff, Anan Hussein requests by this affidavit the Ejectment Proceedings be initiated against the defendant based on the facts below:

1. The Plaintiff owns real property and improvements and is the holder of the Deed to the property located at 569 Butler Drive, Livingston, SC 29107 in Orangeburg County, South Carolina.
2. The Defendant named herein does not have a lease or rental agreement with the Plaintiff in the property which is the subject of this action.
3. The Plaintiff alleges the Defendant is illegally residing inside the home which is the subject of this action.
4. The property has not been taken for any tax, fine or assessment.
5. Defendant is improperly withholding said property from Plaintiff.

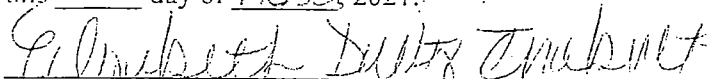
Dated: 11-3-2021



Plaintiff/Attorney

Sworn to me before a Notary Public


this 3 day of November, 2021.


Notary Public for South Carolina

My commission expires: 3-21-2029

ATTEST: TRUE COPY

CLERK OF COURT
ORANGEBURG COUNTY, SC

NOV 03 2021 

2021-CV-38-10600057

CIVIL CASE NUMBER

STATE OF SOUTH CAROLINA)
)
 COUNTY OF ORANGEBURG)
)
 Anan Huessein)
)
 PLAINTIFF(S))
)
 VS.)
)
 David Cody New)
)
 DEFENDANT(S).)

IN THE MAGISTRATE'S COURT

AFFIDAVIT AND ITEMIZATION OF ACCOUNTS

Plaintiff, Anan Hussein, personally appearing before me, who, being duly sworn, states that he is the plaintiff in this action, and that the itemization of accounts which follows is true and correct.

He further states that no part of the sum included in the itemization below has been paid or satisfied in any fashion, and is today due and owed to him.

ITEMIZATION OF ACCOUNTS

Damages	\$7500.00
	\$
	\$
	\$
	\$
TOTAL	<u>\$7500.00</u>

(Copies of bills, papers or other proof of any of the above accounts should be attached to this document.)

Sworn to and Subscribed before me)
 this 3 day of November, 2021.)
[Signature])
 Magistrate or Notary Public for South Carolina)
)
 My Commission expires 3-21-2029)

[Signature]

PLAINTIFF (or his attorney)

NOV 03 2021 [Signature]

Is the property rented to persons with Section 8 vouchers? (check one)

Yes No

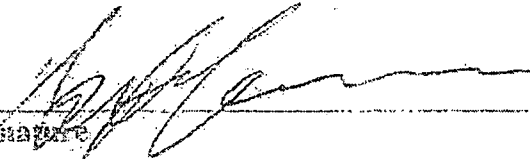
2. Declaration:

I certify that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.

My name is: Anan Hussein
First Middle Last

My address is: 87 Old South Salem Rd Ridgefield CT 06877
Street Address & Unit No. (if any) City State ZIP

Signed on: 11 / 3 / 2021 in _____ County, South Carolina.
Month Day Year


Signature

STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

2-16-20
10-30
202
2021CV3810600057
CIVIL CASE NUMBER
Re-issued on 11-8-21
IN THE MAGISTRATE'S COURT
NOTICE TO QUIT PREMISES

16971

Anan Hussein

11-7-81

Attorney Michael C. Tanner
Post Office Box 1061
Bamberg, SC 29003
(803) 245-9153

PLAINTIFF(S)

Vs
David Cody New
569 Butler Drive
Livingston, SC 29107

803-245-9153

Scottie Gordon
Shawn Gordon

803-552-7490

RECEIVED

NOV 12 2021

DEFENDANT(S)

OCSO Civil Division

Upon an affidavit filed by the plaintiff which states you:

David Cody New

defendant(s), are a trespasser(s) and are occupying the premises at
569 Butler Drive
Livingston, SC 29107

without permission of the owner of said premises. You are required to immediately vacate the premises or contact the:

Western Region Magistrate
6357 Savannah Highway
P. O. Box 387
Neeses, SC 29107
Phone: (803) 247-2011
Fax: (803) 247-2058

within five (5) days to show cause, if any you can, why you should not be ejected from these premises.

FAILURE TO VACATE THE PREMISES OR TO CONTACT THIS OFFICE WITHIN FIVE (5) DAYS MAY RESULT IN THE ISSUANCE OF A WRIT OF EJECTMENT.

Dated: November 8, 2021

JUDGE

Scottie Gordon

PERSONALLY appeared before me, the undersigned deponent, who being duty sworn, says that s/he served the herein Notice to Quit Premises/Rule to Show Cause on

569 Butler Dr Livingston S on the 23 day of NOV
2021 at 10:00 AM AM PM 29107

Sworn to and subscribed before me
this 29 Day of NOV, 2021

Melissa G. Bochetto

NOTARY PUBLIC or JUDGE

My Commission Expires: Jan. 10, 2022

Sheriff's Deputy or Constable

WESTERN REGION
MAGISTRATE
CLERK OF COURT
ORANGEBURG COUNTY, SC

STATE OF SOUTH CAROLINA)
)
COUNTY OF ORANGEBURG)

2021CV3810600056
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

Anan Hussein

Sed 11-23-21
#202

Attorney Michael C. Tanner
Post Office Box 1061
Bamberg, SC 29003

PLAINTIFF(S)

(803) 245-9153

Vs

David Cody New
569 Butler Drive
Livingston, SC 29107

DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

YOU ARE SUMMONED and required to answer the allegations of the attached complaint and present any appropriate counterclaims/crossclaims to the attached Complaint within THIRTY days from the first day after receipt of this summons. Your Answer must be received by the:

Western Region Magistrate
6357 Savannah Highway
P. O. Box 387
Neeses, SC 29107
Phone: (803) 247-2011
Fax: (803) 247-2058

If you fail to answer within the prescribed time, a judgment by default may be rendered against you for the amount or other remedy requested in the attached complaint, plus interest and costs. **If you desire a jury trial, you must request one in writing at least five (5) working days prior to the date set for trial.** If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:



JUDGE

READ ATTACHED INSTRUCTIONS CAREFULLY

November 8, 2021

STATE OF SOUTH CAROLINA

2021CV381060057
CIVIL CASE NUMBER

COUNTY OF ORANGEBURG

IN THE MAGISTRATE'S COURT
NOTICE TO QUIT PREMISES

Anan Hussein

Attorney Michael C. Tanner
Post Office Box 1061
Bamberg, SC 29003
(803) 245-9153

PLAINTIFF(S)

Vs

David Cody New
569 Butler Drive
Livingston, SC 29107

Handwritten notes:
See
#202
11-25-21

DEFENDANT(S)

Upon an affidavit filed by the plaintiff which states you:

David Cody New

defendant(s), are a trespasser(s) and are occupying the premises at

569 Butler Drive

Livingston, SC 29107

without permission of the owner of said premises. You are required to immediately vacate the premises or contact the:

Western Region Magistrate

6357 Savannah Highway

P. O. Box 387

Neeses, SC 29107

Phone: (803) 247-2011

Fax: (803) 247-2058

within five (5) days to show cause, if any you can, why you should not be ejected from these premises.

FAILURE TO VACATE THE PREMISES OR TO CONTACT THIS OFFICE WITHIN FIVE (5) DAYS MAY RESULT IN THE ISSUANCE OF A WRIT OF EJECTMENT.

Dated: November 8, 2021

Handwritten signature of Judge

JUDGE

PERSONALLY appeared before me, the undersigned deponent, who being duty sworn, says that s/he served the herein Notice to Quit Premises/Rule to Show Cause on _____

_____ on the _____ day of _____,

20____ at _____ AM PM

Sworn to and subscribed before me

this _____ Day of _____, 20____

Sheriff's Deputy or Constable

NOTARY PUBLIC or JUDGE

My Commission Expires: _____

**Western Region Magistrate
CASE HISTORY FOR CASE 2021CV3810600057**

Anan Hussein VS David Cody New

FILED DATE: 9/20/2021

CASE TYPE: CV/Notice to Quit

STATUS: Disposed

ASSIGNED JUDGE: Doremus, Dennis Gary II

DISPOSITION JUDGE: Doremus, Dennis Gary II

2022-CV-38-002

CASE PARTIES:

Plaintiff Hussein, Anan

Plaintiff Attorney Tanner, Michael C.
PO Box 1061, Bamberg, SC 29003

Defendant New, David Cody
569 Butler Drive, Livingston, SC 29107

CASE HISTORY FOR CASE 2021CV3810600057

Hussein, Anan

Age: Unknown
DL#:

DOB: Unknown
SSN: 000-00-0000

COST	ORIGINAL	BALANCE DUE	DISBURSED	PAY PRIORITY
Action: Notice to Quit				
SCJD Filing Fee Other Summary \$10	\$10.00	\$0.00	\$10.00	999
Service Fee \$10	10.00	0.00	10.00	999
Civil Filing Fee County 44%/100%	45.00	0.00	45.00	999
Action: Defendant Service Fee				
Service Fee \$10	10.00	0.00	10.00	999
Action: Writ of Ejectment with Document				
Service Fee \$10	10.00	0.00	10.00	999
Total:	\$85.00	\$0.00	\$85.00	

DATE	TIME	EVENT DESCRIPTION
9/20/2021	2:47 PM	Notice to Quit
9/20/2021	2:55 PM	Filing recorded: Notice to Quit Document
9/20/2021	12:00 AM	Filing recorded: Archived Notice to Quit
9/20/2021	2:47 PM	Received payment of \$65 from Michael C. Tanner for Anan Hussein. Printed receipt #5379.
9/21/2021	12:44 PM	Filing recorded: 1st Part Sent to Civil Dept

ATTEST: TRUE COPY
Winnifred
CLERK
ORANGE COUNTY

Print Date: 02/23/2022
Print Time: 2:39:09PM
Requested By: C38SEDWARD

CaseHistory.rpt V6.1

CASE HISTORY FOR CASE 2021CV3810600057

0/26/2021	12:00 AM	C38SEDWARD recorded the following Case Note: Received affidavit of non-service from OCSO.....unable to make contact, gated and locked per Director A. Frazier.....attempts were made on 10-20-21 @ 11:00 am, 10-21-21 @ 8:07 and 10-22-21 @ 3:24 pm
1/3/2021	12:00 AM	C38SEDWARD recorded the following Case Note: Spoke with clerk @ Atty. Michael Tanner's office in reference to non-service.....she stated she was able to find name of the defendant and will send additional fee for service on defendant.
1/8/2021	12:00 AM	C38SEDWARD recorded the following Case Note: Received \$10.00 fee from Atty. Michael Tanner's office along with name of the defendant, David Cody New
1/8/2021	2:28 PM	Filing recorded: Defendant Service Fee
1/8/2021	4:30 PM	Filing recorded: Notice to Quit Document
1/8/2021	12:00 AM	Filing recorded: Archived Notice to Quit
1/8/2021	3:35 PM	Received payment of \$10 from Michael C. Tanner for Anan Hussein. Printed receipt #5401.
1/9/2021	4:48 PM	Filing recorded: 1st Part re-issued to Civil Dept
2/6/2021	12:00 AM	C38SEDWARD recorded the following Case Note: Scottie Gordon was served on 11-23-21
2/20/2022	12:00 AM	Filing recorded: Archived Court Summons
2/16/2022	11:06 AM	Filing recorded: Writ of Ejectment with Document
2/16/2022	12:00 AM	Filing recorded: Writ Document Printed
2/16/2022	11:27 AM	Filing recorded: 2nd Part Sent to Civil
2/16/2022	12:00 AM	C38SEDWARD recorded the following Case Note: Plaintiff, Plaintiff's Attorney (Atty. Michael Tanner), defendant and wife were present for Court.....Judge Doremus found in favor of the plaintiff.....plaintiff paid for WOE.
2/16/2022	10:30 AM	Court event: Civil Court
2/16/2022	11:06 AM	Received payment of \$10 from Anan Hussein for Anan Hussein. Printed receipt #5443.

**STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG**

Scottie Gordon
569 Butler Drive
Livingston, SC 29107

MAGISTRATE SUMMONS

You are hereby summoned to be and appear personally in the

**Western Region Magistrate
6357 Savannah Highway
P. O. Box 387
Neeses, SC 29107**

on **February 16, 2022** at **10:30 AM** to serve as a party in a Bench Trial in the case of:

RE: Anan Hussein

Vs David Cody New

PLAINTIFF(S)

DEFENDANT(S)

Civil Case Number: **2021CV3810600056, Summons & Complaint.**

**HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN
SUCH CASE MADE AND PROVIDED.**



JUDGE

**Western Region Magistrate
6357 Savannah Highway
P. O. Box 387
Neeses, SC 29107
Phone: (803) 247-2011
Fax: (803) 247-2058**

January 20, 2022

**STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG**

Scottie Gordon
569 Butler Drive
Livingston, SC 29107

MAGISTRATE SUMMONS

You are hereby summoned to be and appear personally in the

**Western Region Magistrate
6357 Savannah Highway
P. O. Box 387
Neeses, SC 29107**

on **February 16, 2022** at **10:30 AM** to serve as a party in a Bench Trial in the case of:

RE: Anan Hussein

Vs David Cody New

PLAINTIFF(S)

DEFENDANT(S)

Civil Case Number: **2021CV3810600057, Notice to Quit.**

**HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN
SUCH CASE MADE AND PROVIDED.**



JUDGE

**Western Region Magistrate
6357 Savannah Highway
P. O. Box 387
Neeses, SC 29107
Phone: (803) 247-2011
Fax: (803) 247-2058**

January 20, 2022

The Court ruled for the _____ on the counterclaim, the Court awarded the following

The proceedings were (Check Appropriate Box)

- Recorded electronically.
- Recorded by a court reporter.
- Recorded in writing by the judge.

The Notice of Appeal was served upon the Court by Clerk of Court on 03/09/2022

The jury list was prepared pursuant to S.C. Code Ann. (Check Appropriate Box)(Answer if Applicable)

- § 22-2-80. Selection of jury list for a single trial.
- § 22-2-90. Selection of jury list for scheduled terms of jury trials.

and the Plaintiff and Defendant(s) were given an opportunity to exercise challenges on

The Plaintiff called the following witnesses, and a summary of their testimony is attached.

- | | |
|------------------------|-----------|
| 1. <u>Anan Hussein</u> | 2. _____ |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

The Defendant called the following witnesses and a summary of their testimony is attached.

- | | |
|--------------------------|------------------------|
| 1. <u>Scottie Gordon</u> | 2. <u>Shawn Gordon</u> |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

The Plaintiff made the following motions. A summary of the Plaintiff's and Defendant's position on each motion and the Court's ruling is attached.

- | | |
|----------|-----------|
| 1. _____ | 2. _____ |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

The Defendant made the following motions. A summary of the Plaintiff's and Defendant's position on each motion and the Court's ruling is attached.

- | | |
|----------------|-----------|
| 1. <u>None</u> | 2. _____ |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

The Plaintiff offered the following items into evidence.

- | | |
|---|--|
| 1. <u>A copy of a recorded property deed showing that the Plaintiff is the record owner of said property.</u> | 2. <u>A copy of a tax notice for 2021 showing the Plaintiff as owner of said property.</u> |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

The Defendant raised the following objections to the items that the Plaintiff sought to introduce into evidence:

- | | |
|----------------|-----------|
| 1. <u>None</u> | 2. _____ |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

• The Defendant offered the following items into evidence:

- | | |
|-----------------------|-----------|
| 1. <u>No evidence</u> | 2. _____ |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

The Plaintiff raised the following objections to the items that the Defendant sought to introduce into evidence:

- | | |
|----------------|-----------|
| 1. <u>None</u> | 2. _____ |
| 3. _____ | 4. _____ |
| 5. _____ | 6. _____ |
| 7. _____ | 8. _____ |
| 9. _____ | 10. _____ |

A summary of the Plaintiff's and Defendant's position and the Court's ruling on the objection is attached.

The Court issued the following Judgment _____

Attached are copies of the items which are checked.

- | | | | |
|-------------------------------------|---|--------------------------|--------------|
| <input type="checkbox"/> | Summons and Complaint | <input type="checkbox"/> | Other: _____ |
| <input type="checkbox"/> | Summons and Claim and Delivery | | |
| <input type="checkbox"/> | Landlord-Tenant Rule to Show Cause | | |
| <input type="checkbox"/> | Answer | | |
| <input type="checkbox"/> | Counterclaim | | |
| <input type="checkbox"/> | Judgment | | |
| <input checked="" type="checkbox"/> | Writ of Ejectment | | |
| <input checked="" type="checkbox"/> | Order | | |
| <input type="checkbox"/> | Jury List | | |
| <input checked="" type="checkbox"/> | List of witnesses and a summary of their testimony. | | |
| <input type="checkbox"/> | List of motions, a summary of the parties positions and this court's ruling. | | |
| <input checked="" type="checkbox"/> | List of items offered into evidence, a summary of objections, and court's ruling. | | |
| <input checked="" type="checkbox"/> | Documents and exhibits put into the record | | |

This matter came before this Court on February 16, 2022. The Respondent (herein after referred to as Hussein) filed a Notice to Quit against the Appellant (hereinafter referred to as Gordon). Mr. Hussein was represented by Michael Tanner and Mr. Gordon was Pro Se. Mr. Hussein entered into evidence a copy of a properly recorded property deed showing that Mr. Hussein is the owner of said property. Secondly, Mr. Hussein entered into evidence a 2021 tax notice showing Mr. Hussein as owner of said property. Mr. Gordon filed paperwork with the Court on the day of the trial, but failed to enter any of the evidence as part of his defense. Mr. Gordon referenced a "deed" which attorney Tanner objected to. The supposed "deed" was hand written, illegible and not recorded. Also, there were two handwritten receipts which could have been drawn by anyone. Mr. Gordon admitted on the record that he knew the property wasn't in his name and that they had been looking for David New since 2013. David New is the guy they claim they bought the property from. After considering all the above, I ruled in favor of the Plaintiff based on the fact that the said property was in the name of the Plaintiff and it was properly recorded in the Orangeburg County Register of Deeds.

FILED FOR RECORD
WINNIF A B. CLARK

2022 MAR 29 PM 1:39

CLERK OF COURT
ORANGEBURG, SC

STATE OF SOUTH CAROLINA)

COUNTY OF ORANGEBURG)

2021CV3810600057
CIVIL CASE NUMBER
2022-CP-38-00366
IN THE MAGISTRATE'S COURT

WRIT OF EJECTMENT

Anan Hussein

Contact for Writ of Ejectment
Atty. Michael Tanner
(803) 245-9153

PLAINTIFF(S)

Vs
David Cody New Scottie Gordon
569 Butler Drive
Livingston, SC 29107

DEFENDANT(S)

TO THE SHERIFF/MAGISTRATE'S CONSTABLE:

Upon Judgment of this Court, rendered on the , you are hereby Ordered to proceed to the premises located at 569 Butler Drive

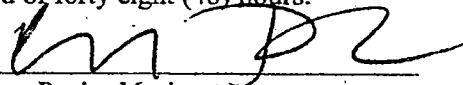
Livingston, SC 29107.

Announce your identity and purpose and serve on the defendant(s) and all occupants a copy of this Writ of Ejectment. Inform them they have **twenty four (24) hours to voluntarily vacate** the premises. **If the premises appear unoccupied and no one responds** to your announced identity and purpose, the Writ of Ejectment shall be served by securely attaching a copy of the Writ in a conspicuous place on the premises.

If after 24 hours following the service or posting of the Writ, the occupants have not voluntarily vacated the premises, a deputy sheriff may enter the premises using only as much force as is necessary to effectuate the Ejectment.

Upon gaining access, you shall **remove from the premises any occupants and all items of personal property found on the premises. Such property may be deposited beside the public street or roadway.** All personal property removed from the premises and placed on a public street or roadway may be removed by the proper local government agency after forty eight (48) hours, excluding Saturdays, Sundays, and holidays. Such property may also be removed in the normal course of debris or trash collection before or after a period of forty eight (48) hours.

February 16, 2022


Western Region Magistrate

_____, being duly sworn state that:

- I personally served a copy of this Writ on _____, an occupant of the rental unit
- On _____ 20____, at _____ the rental unit appeared unoccupied and no one responded when I announced my identity and intentions. I attached a copy of this Writ to a conspicuous part of the premise.
- On _____ 20____, at _____, which was not less than 24 hours from the posting date and time, I returned to the rental unit for the purpose of ejectment.
- Under my supervision, I had all persons and personal property removed and evicted from the rental unit placing all personal property beside the roadside.
- The rental unit was unoccupied. The Tenant and all occupants had vacated the unit.
- Informed by Plaintiff that case is settled.

Date: _____, 20____

ATTEST: TRUE COPY

Sheriff/Deputy Sheriff/Constable
W. J. ...
CLERK OF COURT
ORANGEBURG COUNTY

PROOF OF SERVICE OF INITIAL BRIEF

RECEIVED

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

DEC 20 2023
SC Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Heath P. Taylor,

Circuit Court Judge

Case No. 2023-000564

Scottie Gordon, Appellant

v..

Anan Hussein, Respondent

PROOF OF SERVICE

I certify that I have served the Initial Brief on Anan Hussein by depositing a copy of it in the United States Mail, postage prepaid, on December 16, 2023, addressed to his attorney of record, Michael C. Tanner, Post Office Box 1061, Bamberg, South Carolina 29003.

December 16, 2023



Scottie Gordon
569 Butler Drive
Livingston, South Carolina 29107
(803) 552-7490
Appellant

Gordon
569 Beech Drive
Livingston, SC 29107



Court of Appeals
Clerk of Court
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

