

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
Roger M. Young, Sr., Circuit Court Judge

Appellate Case No.: 2023-001659

PSG Patriots Place Apartments, LLC AMC d/b/a Patriots Place, Successor in Interest to  
Brentwood Sixteen, LLC .....Respondent

v.

Graclescia Jackson. ....Appellant.

MOTION TO DISMISS

Respondent, by and through its undersigned counsel, moves this Court for an Order dismissing the instant action as moot would show as follows:

That on November 17, 2023, this Court temporarily granted Appellant’s Motion to Stay the lower court’s ruling of ejection.

That on November 30, 2023, this Court denied Appellant’s Motion to Stay based upon her failure to submit an undertaking in compliance with statutory requirements.

That pursuant to said Order denying Appellant’s Motion to Stay, the Berkeley County Magistrate reinstated the subject Writ of Ejection and engaged with the County’s Sheriff’s Office or other appropriate authority to post the same and supervise Appellant’s removal from the subject premises.

That the eviction of Appellant Graclescia Jackson has been completed, and that neither Appellant nor any personal property belonging to Appellant remain on the subject premises. Said ejection is evidenced by an Affidavit attached hereto as Exhibit ‘A’.

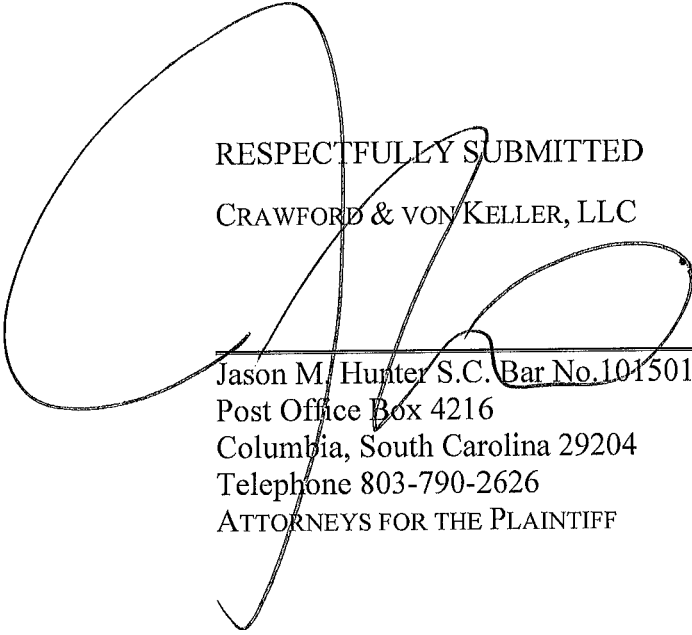
That “[a] case is moot where a judgment rendered by the Court will have no practical legal effect upon an existing controversy because an intervening event renders any grant of effectual relief impossible for the Court.” *Wachesaw Plantation E. Cmty. Servs. Ass’n v.*

Alexander, 414 S.C. 355, 359, 778 S.E.2d 898, 900 (2015). In the present case, the completed eviction of Appellant renders any grant of effectual relief impossible for the Court.

Wherefore, Respondent PSG Patriots Place Apartments, LLC AMC d/b/a Patriots Place, Successor in Interest to Brentwood Sixteen, LLC petitions this Court for an Order dismissing the instant action as moot.

WE SO MOVE

RESPECTFULLY SUBMITTED  
CRAWFORD & VON KELLER, LLC



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Jason M. Hunter S.C. Bar No. 101501  
Post Office Box 4216  
Columbia, South Carolina 29204  
Telephone 803-790-2626  
ATTORNEYS FOR THE PLAINTIFF

# Exhibit 'A'

THE STATE OF SOUTH CAROLINA  
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Appellate Case No.: 2023-001659

PSG Patriots Place Apartments, LLC AMC d/b/a Patriots Place, Successor in Interest to  
Brentwood Sixteen, LLC .....Respondent

v.

Graclescica Jackson. ....Appellant.

AFFIDAVIT OF RESPONDENT

STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

Cindy LaFave, being first duly sworn, deposes and says as follows:

PERSONALLY APPEARED BEFORE ME Cindy LaFave, who, being duly sworn, states as follows:

1. I am employed by PSG Patriots Place Apartments, LLC AMC d/b/a Patriots Place, Successor in Interest to Brentwood Sixteen, LLC (hereinafter "Respondent"), as Property Manager. I am over the age of eighteen years, and I am authorized to make the representations contained in this affidavit on behalf of the Plaintiff. I have personal knowledge of the below events through my review of business records that are kept by Plaintiff in the normal course of business, including the records related to the Appellant.

2. On November 17, 2023, the S.C. Court of Appeals temporarily granted Appellant's Motion to Stay the lower court's ruling of ejection.

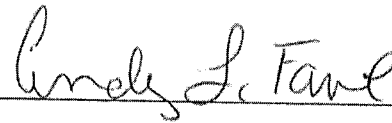
3. On November 30, 2023, the S.C. Court of Appeals denied Appellant's Motion to Stay based upon her failure to submit an undertaking in compliance with statutory requirement.

4. Acting pursuant to said Order, the Berkeley County Magistrate reinstated the subject Writ of Ejectment and engaged with the County's Sheriff's Office or other appropriate authority to post the same and supervise Appellant's removal from the subject premises.

3. As of the execution of the instant Affidavit, the eviction of Appellant Graclescia Jackson has been completed. Neither Appellant nor any personal property belonging to Appellant remain on the subject premises.

FURTHER AFFIANT SAYETH NOT.

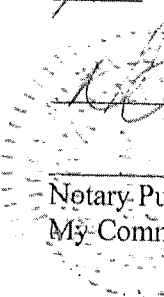
FOR RESPONDENT PSG PATRIOTS PLACE  
APARTMENTS, LLC AMC D/B/A PATRIOTS  
PLACE, SUCCESSOR IN INTEREST TO  
BRENTWOOD SIXTEEN, LLC



Cindy LaFave, Property Manager

SWORN TO before me this  
7th day of February, 2024.

  
\_\_\_\_\_  
(L.S.)

  
**D. L. CRUZ**  
Notary Public, State of South Carolina  
My Commission Expires 7/30/2025

**RECEIVED**

**Feb 08 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

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Appellate Case No.: 2018-001659

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PSG Patriots Place Apartments d/b/a Patriot Place, successor in interest to Brentwood Sixteen,  
LLC ..... Respondent

v.

Graclescia Jackson ..... Appellant.

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**PROOF OF SERVICE**

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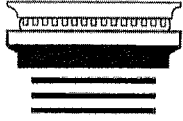
I certify that I served the foregoing Respondent’s Motion to Dismiss in this case on the date given below by mailing it to opposing counsel at the address noted below.

Graclescia Jackson  
3000 Harbour Lake Drive, Unit 13B  
Goose Creek, SC 29445

Respectfully submitted,

s/ Jason M. Hunter  
Jason M. Hunter  
S.C. Bar No. 101501  
Crawford & von Keller, LLC  
Post Office Box 4216  
Columbia, South Carolina 29250  
(803) 764-7444  
ted@crawfordvk.com  
Attorney for Respondent

February 8, 2024



**CRAWFORD & VON KELLER, LLC**

**RECEIVED**

**Feb 08 2024**

**SC Court of Appeals**

SOUTH CAROLINA  
B. Lindsay Crawford, III \*  
Theodore von Keller  
B. Lindsay Crawford, IV\*\*

NORTH CAROLINA  
Benjamin A. Barco  
Brittany T. Morrison\*\*  
William Kibbe

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Charley S. MacInnis  
Jason M. Hunter  
Eric H. Nelson  
Lawrence W. Johnson, Jr.\* - Special Counsel

\* Certified Specialist in Bankruptcy  
and Debtor-Creditor Law in SC

\*\*Admitted in South Carolina and North Carolina

February 8, 2024

**Via ctappfilings@secourts.org and Regular Mail**

SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RE: PSG Patriots Apartments d/b/a Patriot Place, successor in interest to Brentwood Sixteen, LLC vs/. Graclescia Jackson  
Appellate Case No.: 2018-001659**

Dear Sir/Madam:

Enclosed please find Respondent's Motion to Dismiss and Proof of Service regarding the above referenced matter. I have also enclosed a check for \$50.00 for your motion filing fee.

Sincerely,

CRAWFORD & VON KELLER, LLC

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Jason M. Hunter, Esquire  
Post Office Box 4216  
Columbia, South Carolina 29240  
Telephone: (803) 790-2626  
Attorney for Respondent

JMH/tdd  
Enclosure

Cc: Graclescia Jackson  
3000 Harbour Lake Drive, Unit 13B  
Goose Creek, SC 29445

WE ARE A DEBT COLLECTOR. THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

P.O. Box 4216, Columbia, SC 29240 • 1640 St. Julian Place, SC 29204 • 803-790-2626 • Facsimile 803-790-1277  
1017 Ashes Drive, Suite 106, Wilmington, NC 28405 • 910-363-1637 • Facsimile 910-363-1652