

On April 9, 2024, more than a month after the Notice of Appeal was filed and served upon all parties in this case, including Judge G.D. Morgan and the Greenville County Clerk of Court, Respondents filed a proposed order to cancel the mechanic's lien and the Lis Pendens. Judge Morgan signed the Order on today, April 11, 2024 at 9:11 am while the automatic stay was in full effect. By this action, the Greenville County Court moved to violate Appellant's constitutional rights to due process under Rule 241 SCACR, and clearly established law. By proceeding outside of the jurisdiction of the South Carolina Court of Appeals, Judge Morgan practically nullified Appellants' appeal to the South Carolina Court of Appeals, which is vested by law with One Hundred Percent jurisdiction of the matter upon the filing of the Notice of Appeal on clearly ignored the right of the Appellant by allowing the cancellation of the Mechanic's lien and Lis Pendens.

STANDARD OF REVIEW

Generally, a ruling on a motion to dismiss under Rule 12(b)(6), SCRCP, must be based solely on the allegations contained in the complaint. *Baird v. Charleston County*, 333 S.C. 519, 527, 511 S.E.2d 69, 73 (1999). "Viewing the evidence in favor of the plaintiff, the motion must be granted if facts alleged in the complaint and inferences reasonably deducible therefrom do not entitle the plaintiff to relief on any theory of the case." *Jarrell v. Petoseed Co.*, 331 S.C. 207, 209, 500 S.E.2d 793, 794 (Ct. App. 1998)

STANDARD REGARDING STAY

"As a general rule, the service of a notice of appeal in a civil matter acts to automatically stay matters decided in the order, judgment, decree or decision on appeal, and to automatically stay the relief ordered in the appealed order, judgment, or decree or decision." Rule 241(a), SCACR. And the "automatic stay continues in effect for the duration of the appeal unless lifted by order of the lower court, the administrative tribunal, appellate court, or judge or justice of the appellate court." *Id.* "After service of notice of appeal, any party may move for an order lifting the automatic stay in cases which involve the general rule." Rule 241(c)(1), SCACR. When an exception applies, "any party may move for an order imposing a supersedeas of matters decided in the order, judgment, decree or decision on appeal after service of the notice of appeal." *Id.* Under the rule, "[t]he effect of the granting of a supersedeas is to suspend or stay the matters decided in the order,

judgment, decree or decision on appeal.” Id.4

SECTION 18-9-10. When appeal may be taken.

An appeal may be taken to the Supreme Court or the Court of Appeals in the cases mentioned in Sections 14-3-320 and 14-3-330. The procedure for taking an appeal is as provided by the South Carolina Appellate Court Rules.

SECTION 18-9-220. When notice of appeal stays proceedings below.

In cases not provided for in Sections 18-9-130 and 18-9-150 to 18-9-180, the notice of appeal shall stay proceedings in the court below upon the judgment appealed from, except that when it directs the sale of perishable property, the court below may order the property to be sold and the proceeds of the property to be deposited or invested in bonds of this State or of the United States, to abide the judgment of the appellate court

Please See 3521 - Pond Place Partners, Inc. v. Poole

The lis pendens was not actually dissolved at the time of the court's order:

As a general rule, the service of a notice of appeal in a civil matter acts to automatically stay matters decided in the order on appeal, and to automatically stay the relief ordered in the appealed order, judgment, or decree. This automatic stay continues in effect for the duration of the appeal unless lifted by order of the trial judge, appellate court, or judge or justice thereof. The lower court retains jurisdiction over matters not affected by the appeal including the authority to enforce any matters not stayed by the appeal.

Rule 225, SCACR.

WHEREFORE, The Appellant prays and seeks an emergency action by the South Carolina Court of Appeals to either immediately strike the most recent pleadings and respectfully rescind the Order of the Honorable Judge G.D. Morgan to cancel the Mechanic's Lien and Lis Pendens, or in the alternative require the Respondents to post a sufficient bond with the Court to protect the integrity of the Appeal process in the most likely event that Appellant is successful in his appeal of this very Court which persists to ignored the law, evidence, facts, Rules and the rights of this Appellant.

April 10, 2024

Respectfully submitted

s/Christopher Jones
Christopher Jones, Appellant
309 Perry Avenue
Greenville, SC 29601

EXHIBIT A



Christopher Jones <intljonesc@gmail.com>

FW: Jones v. D&B Real Estate Ventures, LLC 2024-CP-23-00312

1 message

Carolyn Denney <cdenney@hplplaw.com>

Tue, Apr 9, 2024 at 12:34 PM

To: "gmorgansc@sccourts.org" <gmorgansc@sccourts.org>

Cc: "gmorganlc@sccourts.org" <gmorganlc@sccourts.org>, Stokely Holder <sholder@hplplaw.com>, "intljonesc@gmail.com" <intljonesc@gmail.com>

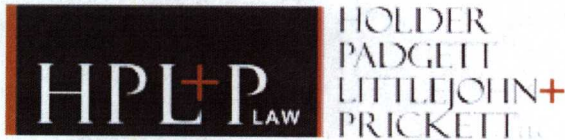
I inadvertently left the plaintiff off my first email, so I have added him here.

Thanks,

CAROLYN DENNEY**PARALEGAL**

Office: 800 E. North Street | Greenville, SC 29601

Mailing: P.O. Box 1804 | Greenville, SC 29602

o. [864-335-8808](tel:864-335-8808) | d. [864-558-9440](tel:864-558-9440) | f. [864-248-4090](tel:864-248-4090)www.hplplaw.com | cdenney@hplplaw.com

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ADDRESS CHANGE: The Greenville office has the following new address: **800 E. North Street, Greenville, SC 29601**

From: Carolyn Denney**Sent:** Tuesday, April 9, 2024 11:48 AM**To:** gmorgansc@sccourts.org**Cc:** gmorganlc@sccourts.org; Stokely Holder <sholder@hplplaw.com>**Subject:** Jones v. D&B Real Estate Ventures, LLC 2024-CP-23-00312

Good Morning,

Please see the attached proposed order that has been e-filed in the above-referenced case. Some of the copied and pasted parts of the Word document were not showing up on our end but I believe I have fixed the issue. However, I have also attached the PDF version for reference in case there are issues with the Word version. If you have any questions or need anything further from us, please let me know.

Thanks!

CAROLYN DENNEY

PARALEGAL

Office: 800 E. North Street | Greenville, SC 29601

Mailing: P.O. Box 1804 | Greenville, SC 29602

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ADDRESS CHANGE: The Greenville office has the following new address: 800 E. North Street, Greenville, SC 29601

2 attachments



Proposed Order_Motion to Dismiss.doc
259K



Proposed Order_Motion to Dismiss.pdf
403K

EXHIBIT B

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF GREENVILLE)	C.A. No.: 2024-CP-23-00312
)	
Christopher Jones,)	ORDER GRANTING DEFENDANTS'
)	MOTION TO DISMISS
Plaintiff,)	
)	(Cancelling Lis Pendens in
vs.)	2024-LP-23-00058, and
)	Cancelling Mechanic's Lien in
D&B Real Estate Ventures, LLC; Darius)	ROD Book MI 0157 at Pages 0241-0246)
Jones ; Bradley Robinson)	
)	
Defendants.)	

This matter is before this Court upon a Motion to Dismiss filed by Defendants D&B Real Estate Ventures, LLC, Darius Jones, and Bradley Robinson (“Defendants”).

BACKGROUND

On January 16, 2024, the Plaintiff Christopher Jones (“Plaintiff”) filed a Mechanic’s Lien (the “Lien”) against property owned by Defendant D&B Real Estate Ventures, LLC, with an address of 331 Loop Street, Greenville, South Carolina 29609 (the “Property”). The Lien was filed in the Greenville Register of Deeds Office under Book MI 0157 at Pages 0241-0246. It was attached as Exhibit A to the Plaintiff’s Complaint.

On the face of the Lien, it states the following above the Plaintiff’s notarized signature:

Claimant, Christopher Jones furnished the following Labor, Materials or Services:
Construction Services, Finances, Material, Labor and Funds.

1. By virtue of a duly executed, legally binding verbal and written contract and approval, Claimant contracted with other contractors and subcontractors to improve the above-

mentioned property by purchasing materials, installing materials, assist with new addition design-build home, pre-engineering, infrastructure work, negotiations, and consulting, installing HVAC hardware, new electrical, plumbing, insulation, clearing & cutting trees and provided comprehensive planning for residential housing occupancy. Darius Jones and Bradley Robinson for D & B Real Estate Ventures, LLC assured Petitioner that the funds would be paid to the Petitioner by Respondents. The Respondents proposed to reimburse Petitioner for the funds he committed to this property. Petitioner has provided materials, services and finances up until this date to the property located at 331 Loop Street Greenville, SC 29609. As of the time of the filing of this document, Claimant Christopher Jones has not received payment, nor due consideration.

2. Labor, finances, material, and services were furnished in connection with improvement and operations of the property located **331 Loop Street Greenville, South Carolina 29609**
3. **Tax Map #0176-00-0.120.00** in the County of Greenville. A legal description of the property is attached as Exhibit "A".
The name and address **D & B Real Estate Ventures, LLC 331 Loop Street Greenville, SC 29609**
4. Claimant claims a Mechanic's Lien against the said property for the amount of **\$45,610.51** by virtue and authorization of the Owners along with a legally binding agreement, and authorization to perform the work. Claimants contracted with D & B Real Estate Ventures, LLC for the benefit of the property and the Owners Darius Jones and Bradley Robinson.

Dated: January 16, 2024; Christopher Jones, Lien Administrator, 330 East Coffee Street Greenville, SC 29601:

By:  Christopher Jones, Lien Administrator

I am ___ am not XX required to be licensed or registered as required by South Carolina Code Annotated § 29-5-15.

See *Lien*, pp.1-2.

The next page of the Lien includes a Verified Statement of Account, which the Plaintiff also signed before a notary as further certification of the purported work and debt amounts giving rise to the Lien. See *Lien*, p. 3.

On the day after filing the Lien, January 17, 2024, the Plaintiff filed a Complaint with the following title in its caption: "Foreclosure of Mechanic's Lien". The Complaint was filed against each of the above-referenced Defendants despite the Property being owned by only Defendant D&B Real Estate Ventures, LLC, as shown on the Lien. The Complaint asserts the following six (6) causes of action: (1) Foreclosure of Mechanic's Lien; (2) Quantum Meruit; (3) Unjust Enrichment; (4) Breach of Contract; (5) Violation of S.C. Code § 27-1-15; and (6) Misrepresentation. The relief sought in the Complaint is the same amount referenced in the Lien, \$45,610.51.

In each of the first five (5) Causes of Action plead by Plaintiff, reference is made by Plaintiff to the purported labor and materials provided by Plaintiff towards the Property.

The Sixth Cause of Action pled by Plaintiff includes just one paragraph that reads as follows:

34. Defendants deliberately misrepresented that the correct and truthful status of the title to 331 Loop Street Greenville SC bearing Tax Map No. 0176-00-0.120.00. Plaintiff will evidence demonstrating that the title to this property is not unencumbered. According to attorneys Bracknell Shuler and Andrew Jones Jr., stated to Plaintiff that the title to this property is not clear to close with title insurance. Defendants intentionally misrepresented to Plaintiff that there was a recent title search prior to Plaintiff contract.

See *Complaint*, p. 7.

The Plaintiff also filed a *Lis Pendens* on January 17, 2024, under 2024-LP-23-00058 (the “*Lis Pendens*”).

On February 7, 2024, Defendants filed a Motion to Dismiss or in the alternative, Motion for Summary Judgment.

A hearing was held on March 7, 2024, with attorney M. Stokely Holder present for Defendants, and Plaintiff appearing *pro se*.

STANDARD OF REVIEW

A Motion to Dismiss under Rule 12(b)(6), SCRPC, may be granted if the alleged facts and inferences to be drawn therefrom, viewed in the light most favorable to the plaintiff, do not entitle the plaintiff to relief on any theory. *Hambrick v. GMAC Mortg. Corp.*, 370 S.C. 118, 634 S.E.2d 5 (Ct.App. 2006).

LAW AND ANALYSIS

S.C. Code Ann. § 40-59-30(B) provides that a person who has “not procured a license or registered with the commission and is required to do so by law may not file a mechanic’s lien or bring an action at law or in equity to enforce the provisions of a contract for residential building.” *S.C. Code Ann. § 40-59-30(B)*. At the hearing, the Plaintiff admitted to the fact that he is not licensed as a residential builder or a specialty contractor.

In an effort to avoid the implications of the above-referenced statute, the Plaintiff stated that he merely subcontracted the work at issue to a licensed builder. Not only does this run contrary to the Plaintiff’s own sworn pleadings, that arrangement would still be violative of the relevant statutory scheme. See *S.C. Code Ann. § 40-59-20(6)* (“‘Residential builder’ means one who constructs, superintends, or offers to construct or superintend the construction, repair,

improvement, or reimprovement of a residential building or structure ... when the cost of the undertaking exceeds five thousand dollars. Anyone who engages or offers to engage in such undertaking in this State is considered to have engaged in the business of residential building.”(emphasis added).

The Plaintiff's own allegations, and sworn statements attached thereto, state that he performed over Five Thousand Dollars (\$5,000.00) worth of construction work on the Property. The Plaintiff admits that he doesn't have a residential builders license. Accordingly, the Plaintiff doesn't have legal standing to pursue his claims for the work he alleged to perform on the Property, and Plaintiff's lien is considered frivolous under S.C. Code Ann. § 29-5-15. Therefore, Plaintiff's causes of action must be dismissed, the *Lis Pendens* shall be dismissed, and the Mechanic's Lien shall be cancelled of record by the filing of this Order in the Register of Deeds Office.

The Plaintiff's Six Cause of Action for Misrepresentation is also clearly defective. To establish a cause of action for Misrepresentation, sufficient allegations of fact must be present in the Complaint to address all elements of fraud/misrepresentation or the Complaint will be considered 'fatally defective'. *Mutual Savings & Loan Ass'n v. McKenzie*, 274 S.C. 630, 633, 266 S.E.2d 423 (1980). From what can be discerned from the Plaintiff's one paragraph Cause of Action for Misrepresentation, it is woefully lacking and in does not satisfy the pleading requirements for a claim of fraud/misrepresentation in this State.

Of further note, Plaintiff's Prayer for Relief specifically states that he is seeking the same \$45,610.51 in damages for his Sixth Cause of Action (Misrepresentation) as he is seeking under his Second, Third, Fourth and Fifth Causes of Action. The allegations in each of those prior

causes of action relate specifically to the purported materials and labor the Plaintiff alleges to have provided towards the Property, and they each (together with the First Cause of Action) make clear that the amount is reflective of the debt owing for such materials and service. Accordingly, the same ground for dismissing the Plaintiff's first five Causes of Action (violation of S.C. Code Ann. § 40-59-30(B)) is an additional ground for dismissing the Plaintiff's Sixth Cause of Action.

CONCLUSION

After considering the pleadings, arguments from the parties, and the applicable law, the Court GRANTS the Defendants' Motion and hereby orders that: **(1) the Plaintiff's Complaint against Defendants shall be dismissed; (2) the *Lis Pendens* shall be cancelled of record by the filing of this Order in 2024-LP-23-00058; and (3) the Lien shall be cancelled of record by the filing of this Order in the Greenville County Register of Deeds Office.**

AND IT IS SO ORDERED.

JUDGE'S SIGNATURE PAGE FOLLOWS



Greenville Common Pleas

Case Caption: Christopher Jones vs. D & B Real Estate Ventures Llc , defendant, et al
Case Number: 2024CP2300312
Type: Order/Other

So Ordered

G.D. Morgan Jr.

Electronically signed on 2024-04-09 18:12:47 page 7 of 7

EXHIBIT C



Greenville County 13th Judicial Circuit Public Index





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Switch View					
Christopher Jones vs. D & B Real Estate Ventures Llc , defendant, et al					
Case Number:	2024CP2300312	Court Agency:	Greenville County Common Pleas	Filed Date:	01/17/2024
Case Type:	Common Pleas	Case Sub Type:	Forfeit-Petit (840)	File Type:	Non-Jury
Status:	Dismissed	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:	Dismissed by Court - not Rule 40J	Disposition Date:	03/13/2024	Disposition Judge:	Morgan, G. D. Jr.
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties	Judgments	Tax Map Information	Associated Cases	Actions	Financials	
Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
D & B Real Estate Ventures Llc	NEF(04-09-2024 11:20:22 AM) Order/Order Cover Sheet \$25....	Filing		04/09/2024-13:19		
D & B Real Estate Ventures Llc	Order/Order Cover Sheet \$25.00	Filing		04/09/2024-11:20		
Jones, Christopher	Exhibit/Exhibit List 4128	Filing		03/19/2024-16:19		
Jones, Christopher	Notice of Appeals to SCCOA and Service	Filing		03/13/2024-16:43		
D & B Real Estate Ventures Llc	NEF(03-13-2024 10:49:21 AM) Order/Electronic Form 4	Filing		03/13/2024-10:49	03/13/2024-10:49	
D & B Real Estate Ventures Llc	Order/Electronic Form 4-Dismissed	Order		03/13/2024-10:49	03/13/2024-10:49	
Jones, Christopher	Supplemental Brief in Opposition to Motion to Dismiss	Filing		03/08/2024-13:46	03/13/2024-13:46	
Jones, Christopher	Service/Proof Of Service as to D&B Real Estate	Filing		03/07/2024-09:28	03/13/2024-09:41	
Jones, Christopher	Service/Proof Of Service as to Bradley Robinson	Filing		03/07/2024-09:28	03/13/2024-09:42	
Jones, Christopher	Service/Proof Of Service as to Tya Kennedy	Filing		03/07/2024-09:28	03/13/2024-09:42	
Jones, Christopher	Service/Certificate Of Service	Filing		03/07/2024-09:27	03/13/2024-09:40	
Jones, Christopher	Pit's Response and Opposition to Def's Motion to Dismiss	Filing		03/07/2024-09:20	03/13/2024-09:20	
Jones, Christopher	Opposition to Motion to Quash	Filing		03/07/2024-09:18	03/13/2024-09:18	
Jones, Christopher	Pit's Motion to Strike and Motion for Entry of Default	Motion		03/07/2024-09:16	03/13/2024-09:16	
Jones, Christopher	Service/Certificate Of Service	Filing		03/07/2024-09:02	03/13/2024-09:02	
Jones, Christopher	Pit's Motion for Sanctions and to Compel	Motion		03/07/2024-09:01	03/13/2024-09:01	

D & B Real Estate Ventures Llc	NEF(02-19-2024 03:15:24 PM) Notice/Notice of Hearing and...	Filing		02/19/2024-15:24	03/13/2024-15:24	
D & B Real Estate Ventures Llc	Notice/Notice of Hearing and Service	Filing		02/19/2024-15:15	03/13/2024-15:15	
Jones, Christopher	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/19/2024-09:36	03/13/2024-09:36	
Coleman, Joye S	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/19/2024-09:36	03/13/2024-09:36	
Bussey, Raford W Jr.	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/19/2024-09:36	03/13/2024-09:36	
Holder, M. Stokely	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/19/2024-09:36	03/13/2024-09:36	
D & B Real Estate Ventures Llc	NEF(02-16-2024 03:29:26 PM) Motion/Quash	Filing		02/16/2024-15:51	03/13/2024-15:51	
D & B Real Estate Ventures Llc	Defs/D & B Real Estate Ventures Motion/Quash	Motion		02/16/2024-15:29	03/07/2024-15:29	
D & B Real Estate Ventures Llc	NEF(02-12-2024 08:12:19 AM) Order/Electronic Form 4	Filing		02/12/2024-08:12	03/13/2024-08:12	
D & B Real Estate Ventures Llc	Order/Electronic Form 4	Order		02/12/2024-08:12	03/13/2024-08:12	
Jones, Christopher	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:40	03/13/2024-11:40	
Coleman, Joye S	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:40	03/13/2024-11:40	
Bussey, Raford W Jr.	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:40	03/13/2024-11:40	
Holder, M. Stokely	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:40	03/13/2024-11:40	
Jones, Christopher	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:37	03/13/2024-11:37	
Coleman, Joye S	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:37	03/13/2024-11:37	
Bussey, Raford W Jr.	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:37	03/13/2024-11:37	
Holder, M. Stokely	3/4/2024 MOTION Roster/Notice of Motions Roster Publication	Action		02/08/2024-11:37	03/13/2024-11:37	
D & B Real Estate Ventures Llc	Notice/Notice of Appearance	Filing		02/07/2024-10:06	03/13/2024-10:06	
D & B Real Estate Ventures Llc	Def's/Motion to Dismiss	Motion		02/07/2024-10:06	03/07/2024-10:06	
Jones, Christopher	Notice of Parties' Oral/Video Depositions Diamond Realty	Filing		02/02/2024-15:36	03/13/2024-15:36	
Jones, Christopher	Notice of Parties' Oral/Video Depositions Bradley Robinson	Filing		02/02/2024-15:35	03/13/2024-15:35	
Jones, Christopher	Notice of Parties' Oral/Video Depositions D&B Real Estate	Filing		02/02/2024-15:33	03/13/2024-15:33	
D & B Real Estate Ventures Llc	Affidavit in Support of Motion to Quash Subpoena	Filing		01/30/2024-09:22	03/13/2024-09:22	
D & B Real Estate Ventures Llc	Def/D & B Real Estate/Motion to Quash Subpoena	Motion		01/30/2024-09:19	03/07/2024-09:19	
Jones, Christopher	Service/Certificate Of Service for Summon & Complaint	Filing		01/24/2024-16:07	03/13/2024-16:07	
Jones, Christopher	Service/Certificate Of Service For Motion TRO	Filing		01/24/2024-16:06	03/13/2024-16:06	
Jones, Christopher	2/5/2024 MOTION Roster/Notice of Motions Roster Publication	Action		01/23/2024-16:18	03/13/2024-16:18	
Jones, Christopher	Plt's/Motion for Temporary Restraining Order	Motion		01/19/2024-15:50	02/08/2024-15:50	

Jones, Christopher	Summons & Complaint	Filing		01/17/2024-15:57	03/13/2024-15:57	
Jones, Christopher	Lis Pendens Filed	Filing		01/17/2024-15:55	03/13/2024-15:55	

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STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

RECEIVED

Apr 10 2024

SC Court of Appeals

CHRISTOPHER JONES,

Appellant

VS.

D&B REAL ESTATE VENTURES, LLC

Respondents

Appeal No. 2024-00417

CERTIFICATE OF SERVICE

**TO: D&B Real Estate Ventures, LLC
Judge G.D. Morgan and Greenville County Clerk of Court**

I hereby certify under the penalties of perjury that I have on this 10th day of April, 2024 have caused to be delivered by U.S Postal Service, to the Parties named herein, a copy of the Emergency Petition and a copy of the Motion to Extend Automatic Stay filed with the SC Court of Appeals, with sufficient postage affixed thereto: and mailed to the address below for each party.

M. Stokely Holder
800 E. North St
Greenville, SC 29601

Greenville County Clerk of Court
Judge G.D. Morgan
305 E. North St
Greenville, SC 29601

April 10, 2024

Respectfully submitted

s/Christopher Jones
Christopher Jones, Appellant
309 Perry Avenue
Greenville, SC 29601