

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

Case No.: 2020-CP-23-03949
Appellant Case No.: 2023-001227

**AFFIDAVIT OF
RA'NA HEIDARI, ESQ.**

I, Ra'na Heidari, Esq., being duly sworn, depose, and say as follows:

1. I was retained by Brian and Kristina Bowles (“Appellants”) in late 2022 to represent them in *Nery Rodas dba RNG Contracting LLC v. Brian W. Bowles and Kristina Bowles* (Case No.: 2020-CP-23-03949) (the “RNG case”) as well as another civil matter while employed at my previous firm, A Business Law Firm, LLC (“ABL”).
2. The Appellants’ recent response to the Motion to Dismiss filed by the Respondent contains several inaccuracies regarding my handling of their case.
3. As an officer of the court and in consideration of Rule 3.3 of the South Carolina Rules of Professional Conduct, it is my duty to ensure the tribunal is not misled by false statements or omissions that could impact the integrity of the adjudicative process.
4. At the time I was retained, the Appellants were already in default in the RNG case due to their repeated failures to comply with court orders, and a damages hearing had been scheduled.
5. Any assertion that I failed to “submit the discovery” materials is incorrect.
6. Following the court’s ruling against the Appellants, which formally entered the default judgment and dismissed their counterclaims, I discussed the possibility of an appeal with Appellants.

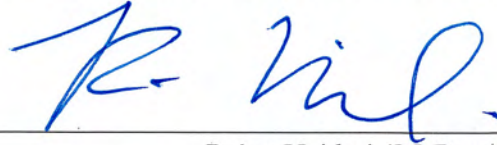
7. Appellants decided to proceed and deposited \$5,000 into an evergreen retainer with ABL to initiate the appeal.
8. On or around July 31, 2023, I filed the Notice of Appeal with the Court of Appeals and subsequently ordered the transcript from the June 29, 2023, hearing.
9. I drafted and filed motions for extensions, the Designation of Matter, and the Initial Brief, all of which were necessary to ensure a proper and thorough appeal.
10. The Appellants were regularly provided with detailed billing statements through ABL's billing system, Clio. It is my understanding that these statements were sent monthly, outlining the work performed and associated fees, both via email and through Clio's secure client portal.
11. The claims of falsified billing, failure to provide billing statements, and lack of communication regarding the same are unfounded and contradicted by the documentation that was provided to them throughout the course of my representation.
12. I began working at Holder Padgett Littlejohn + Prickett, LLC (HPLP) in March of 2024.
13. Despite multiple requests and deadlines provided, the Appellants consistently refused to execute a new engagement letter with HPLP and failed to replenish their retainer which had long since been exhausted.
14. The Appellants have alleged that I falsely billed them for filing the Record on Appeal, which is categorically false.
15. Any work performed on the Record on Appeal occurred while I was employed at HPLP.
16. The Record on Appeal was not filed due to the breakdown of the attorney-client relationship before its completion. No billing was submitted or paid for this task.

17. To my knowledge, there were no communications with the Appellants that would reasonably imply or lead them to believe that the Record on Appeal had been completed or submitted.
18. The Appellants did not make any payments beyond the \$5,000 retainer paid to ABL in the summer of 2023, and they failed to replenish their retainer as required.
19. Throughout my representation, I made efforts to accommodate the Appellants by keeping my billing extremely conservative and, in many instances, not charging for substantial amounts of work performed.
20. After the Appellants failed to execute a new engagement letter or replenish their retainer and the motions to withdraw were filed, the Appellants expressed their intent to terminate my representation due to dissatisfaction with the request for additional funds.
21. I filed a Motion to Withdraw as Counsel for Cause in this matter May 2024, and I was formally relieved from the *RNG* appeal by court order in June 2024.
22. Despite the breakdown in the attorney-client relationship, I ensured that the Appellants' legal matters were attended to until my withdrawal.
23. I consistently worked in good faith, providing legal services and support throughout my representation.
24. I have always acted in accordance with the Rules of Professional Conduct, provided timely and detailed billing, and dedicated significant effort to the Appellants' cases.
25. In accordance with my ethical obligations as an officer of the court and under Rule 3.3 of the South Carolina Rules of Professional Conduct, I submit this affidavit to correct the record and clarify any inaccuracies presented in the Appellants' response to the Respondent's Motion to Dismiss.

FURTHER AFFIANT SAYETH NOT.

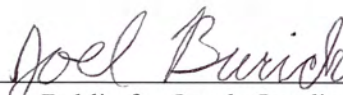
Respectfully submitted this 4th day of November, 2024.

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC.



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SWORN TO AND SUBSCRIBED
before me this 4th day of November, 2024.


Notary Public for South Carolina
My Commission Expires: 08/08/2033

