

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON)	CASE NO: 2022-CP-10-03492
PVOne REO, LLC)	
Plaintiff,)	DEFENDENT'S
Vs.)	NOTICE TO ACCEPT ARTWORK AS
MARY A WHITE, et al,)	ALTERNATIVE SECURITY TO
Defendant,)	SUPERSEDEAS BOND

_____)	RECEIVED
STATE OF SOUTH CAROLINA)	Dec 27 2024
COUNTY OF CHARLESTON)	SC Court of Appeals

Defendant, DeWayne Syke, hereby moves this Honorable Court to accept a piece of artwork as an alternative form of security to a supersedeas bond pursuant to Rule 62 of the South Carolina Rules of Civil Procedure and applicable case law.

Defendant states as follows:

BACKGROUND

1. A judgment required to post a written bond security undertaking in the amount of Seventy-Five Thousand and No/100 (\$75,000.00) Dollars was entered on 3/14/2024.
 2. Defendant has filed a Notice of Appeal and seeks to stay enforcement of the judgment during the pendency of the appeal.
 3. Pursuant to Rule 62(d), a supersedeas bond is typically required to stay the enforcement of a judgment.
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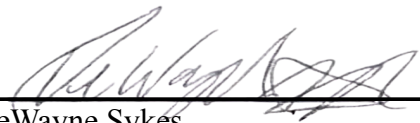
PROPOSED ALTERNATIVE SECURITY

4. Defendant proposes to provide an alternative form of security in the form of artwork titled ANUDDUH, created by Artist's DeWayne Sykes, with an appraised value of \$100,000.
 5. The artwork has been professionally appraised by Dr. Ade Ofunniyin, a qualified and independent art appraiser, on 8/10/2013. A copy of the appraisal report is attached hereto as Exhibit A.
 6. The appraised value of \$100,000 exceeds the amount required to satisfy the judgment and costs.
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LEGAL ARGUMENT

7. South Carolina courts have the discretion to accept alternative forms of security, including cash deposits, letters of credit, and other financial guarantees, in lieu of a supersedeas bond.
8. The proposed artwork is a valid and tangible asset that meets the purpose of ensuring the Plaintiff will be compensated if the appeal is unsuccessful.
9. Defendant has already transferred possession of the artwork to the Plaintiff to secure the Plaintiff's interest during the appeal.

MARCH 18, 2023


DeWayne Sykes
1953 Jacksonville Road
North Charleston, South Carolina 29405
(843) 345-9870
In Propria Persona

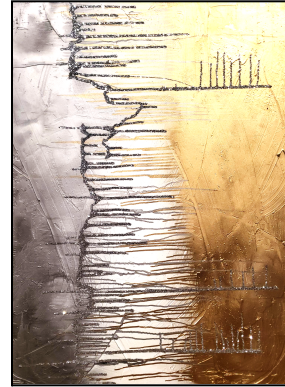
ART APPRAISAL

Exhibit A

Appraiser: Dr. Ade Ajani Ofunniyin
Gullah Society INC
1590 West Robinhood dr.
Charleston, SC 29407
Email: info@thegullahsociety.com
Website: thegullahsociety.com

Date of Appraisal: 8/10/2013

Subject of Appraisal: "ANUDDUH" by DeWayne A. Sykes
Artist Information: DeWayne A. Sykes (b. 1979, Charleston, SC)
Artwork Details:



- **Title:** "ANUDDUH" (part of the Gullah Define series)
- **Year of Creation:** 2012
- **Medium:** MIXMEDIA
- **Dimensions:** 24 x 48 inches
- **Provenance:** Created as part of the Gullah Define series, reflecting cultural and linguistic traditions of the Gullah people.

Historical and Cultural Significance: DeWayne A. Sykes is a contemporary Gullah artist celebrated for preserving and reinterpreting Gullah culture through innovative mediums. "ANUDDUH" a title rooted in Gullah dialect, exemplifies the artist's commitment to showcasing the resilience, traditions, and language of the Gullah people. Created using pyrography on birch wood, this piece demonstrates an exceptional level of craftsmanship and dedication to cultural preservation.

This artwork is highly significant as part of the Gullah Define series, a collection that has gained recognition for its profound representation of Gullah life and language. The use of pyrography—an uncommon technique—enhances the artistic and historical value of the work.

Market Analysis: The market for Gullah art has experienced increased attention in recent years, driven by growing recognition of its cultural importance and its unique contribution to African American art history. DeWayne A. Sykes' works have been sought after in both private and institutional collections, particularly for their connection to the Gullah heritage.

Condition of the Artwork: The artwork is in excellent condition, with no visible signs of deterioration or damage. The birch wood has been well-preserved, and the pyrography maintains its intricate detailing and depth.

Appraised Value: Based on market trends, cultural significance, condition, and rarity of the medium, the fair market value of "ANUDDUH" is appraised at **\$100,000 (One Hundred Thousand Dollars)**.

This appraisal is conducted to the best of my expertise and knowledge as a Gullah cultural expert and art appraiser.

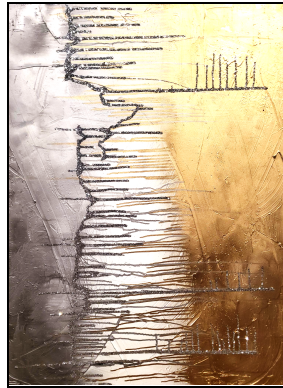
Signed:

Dr. Ade Ajani Ofunniyin



Gullah Society Inc and The Charleston Neck Society Inc

CERTIFICATE OF VALUATION



Certificate of Appraised Value

This certificate verifies the appraised value of the following artwork:

Title: "ANUDDUH"

Artist: DeWayne A. Sykes (b. 1979, Charleston, SC)

Medium: MIXMEDIA

Dimensions: 24 x 48 inches

Year of Creation: 2012

Series: Gullah Define

Appraised Value: \$100,000 (One Hundred Thousand Dollars)

This valuation is based on the cultural significance, artistic merit, and market value of the artwork, as assessed by a qualified expert.

Appraiser Information: Dr. Ade Ajani Ofunniyin

Gullah Society INC

1590 West Robinhood dr.

Charleston, SC 29407

Email: info@thegullahsociety.com

Website: thegullahsociety.com

Date Issued: 8/10/2013

Signed:

Dr. Ade Ajani Ofunniyin



Gullah Society and The Charleston Neck Society

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Dec 27 2024

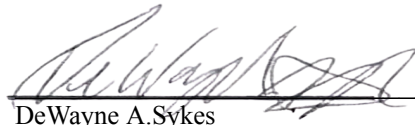
PROOF OF SERVICE

SC Court of Appeals

I certify that I have served the Notice John Dodds III, Stephen Peterson Groves, by depositing a copy of it in the United States Mail, Postage prepaid, on December 27, 2024, addressed to its attorney of record, 858 Low county Bld ste, 101, Mt, Pleasant, South Carolina 29464, 25 Calhoun street, Suite 250 Charleston, South Carolina 29401 ,

December 22, 2024

Sincerely,



DeWayne A. Sykes
1953 Jacksonville road
N. Charleston, South Carolina 29405
(843) 478-5735
DEFENDENT