

STATE OF SOUTH CAROLINA  
County of Charleston  
Pierre Brisbane  
Plaintiff,

V  
Around the Clock Bondsmen  
Thomas H. Holiday  
Defendant's

IN The Court of Common  
Pleas Civil Action 2022-CP-10-48  
4804

Case #: 2022-CP-10-4804

NOTICE OF APPEAL  
TO VACATE ORDER

RECEIVED

Jan 28 2025

S.C. SUPREME COURT

Please take notice that Plaintiff, Pierre Brisbane, here by gives notice of his intent to move, & do so move, for a order of the appellate court to vacate the order of Hon. Bentley D. Price, Circuit Judge & grant Plaintiff, Pierre Brisbane, a summary judgement against Defendant Around The Clock Bondsmen & Thomas H. Holiday. Plaintiff, Pierre Brisbane, tardiness is due to not being served a notice of the hearing that has been held in Plaintiff absences. The order was given & Plaintiff was not served with notice of order. Defendant's has fraudulently falsified in court documents, failing to disclosed all contract's Bond & Bond contract, while stipulating a secondary contract promissory note. Plaintiff has in good faith contacted Clerk of Court, informed Clerk of Court of his incarceration for future proceeding. Defendant's in the absence of Plaintiff knowledge became Plaintiff P.O.A (Power of Attorney) while entering into the court record a C.O.J (Confession of Judgment) that was not authorized. Plaintiff in a Good Faith attempt, requested from Defendant's, who is:

- 1) Court appointed surety
- 2) Money NET Dated Transaction Loan
- 3) Abstract of Title
- 4) ERRORS & Omission claims
- 5) 8181 TAX form Information return for public offered offered original issue Discount Instruments
- 6) (C.M.I.R) currency money instrument LOG
- 7) Preliminary Change of Title & Ownership Form
- 8) R.C.N call schedule (schedule AC-N Past Due & NonAccrual Loans, Leases, & Other assets)
- 9) R.C.P Call schedule (RC-P-1-4 Family Residential Mortgage Banking Activities
- 10) All other Accounting & Book keeping

Due to defendant's refusal to cooperate Plaintiff subpoena all former records from Defendant's, but Defendants failed to comply with subpoena. Plaintiff due to Defendant's false statement was incarcerated causing Plaintiff to sustain injuries;

1) Lost of wages

b) mental distress

2) Pain & suffering

3) Court Cost

4) Lost of time & energy

5) Fraud

Plaintiff incarceration at CHARLESTON COUNTY AL Cannon Detention Center has hindered Plaintiff Due Process rights along with Plaintiff rights to properly proceed under SC. Rule of Civil Procedure. Plaintiff Pierrie Brisbane tardiness is due to not being given Notice of MAY 30, 2023 hearing or served notice of Hon. Bentley D. Price order.

### Conclusion.

Plaintiff gives notices & do so move appellate court to vacate the order of Hon. Bentley D. Price order & grant Plaintiff a motion for summary Judgment against Around the Clock Bondmen & Thomas H. Holiday.

Exhibit: A

1) summons

Exhibit: B

2) Complaint

Exhibit: C

3) Motion to be Relieved on Bond (statement)

Exhibit: D

4) Bond & Bond contract

Or remand for further litigation

Pierrie Brisbane

Pierrie Brisbane

Pro se litigate