

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

The Honorable T.W. McGee III, Circuit Court Judge

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Appellate Case No.: 2025-000104  
Civil Action No.: 2022-CP-10-03510

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Great Deal Investing LLC, of Wyoming.....Appellant,

v.

Jared Burnett, Brett Buras, Damian Bergamaschi,  
Steve Decker, J&B Holdings Group, LLC, and  
Hatchery Hill MHC, LLC.....Respondents.

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**RESPONDENTS’ OBJECTION TO CERTIFICATION**

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The Respondents respectfully object to the certification of this case to the South Carolina Supreme Court. This case is a simple licensing case, where the Appellant failed to hold a real estate license that would enable it to be involved in a real estate transaction in South Carolina. The existing statutory and case law of this State clearly establish the requirements for licensure for out of state licensees.

The Appellant is attempting to inject Constitutional arguments into a simple licensing case to convolute and obfuscate the real issue in this civil action, i.e. Appellant’s failure to hold the necessary real estate license to obtain a commission in connection with a real estate transaction and Appellant’s efforts to circumvent the real estate licensing statutes. The Appellant’s own contract plainly states that it does not hold any professional licenses. Notwithstanding the fact that

Appellant does not hold any professional licenses, the Appellant filed a civil action in Orangeburg County, South Carolina seeking a remedy, based on South Carolina law, that it was entitled to a commission relating to the sale of real property in Orangeburg County. On the one hand, Appellant seeks a remedy in the South Carolina Courts; but, on the other hand, Appellant argues that Appellant is not subject to the real estate licensing laws of South Carolina. The Appellant's failure to be properly licensed bars Appellant from maintaining a civil action in South Carolina. The case law in South Carolina is well established and bars Appellant from any recovery in the civil action filed by Appellant. As such, Respondents respectfully object to certification to the Supreme Court. The issue in this case does not affect the public interest or a legal principle of major importance, as contemplated in Rule 204(b), SCACR. The South Carolina Legislature has provided real estate licensing statutes with clear provisions for out of state licensees to perform real estate services in South Carolina.

*s/ Joey R. Floyd* Date: February 21, 2025  
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PROOF OF SERVICE

The undersigned certifies that he has served **Respondents' Objection to Certification** upon counsel for Appellant by attachment to AIS-registered email, pursuant to the Order of the Supreme Court in re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, as follows:

J Gregory Studemeyer (SC Bar No.: 5416)

February 21, 2025

S/Joey R. Floyd  
Joey R. Floyd, SC Bar No.: 68491