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1 ARBITRATION BEFORE FRANKLIN J. SMITH, JR.  
 2 DEPOSITION OF CHARLES HENSON  
 3 OCTOBER 19, 2022  
 4  
 5 DIAMOND JUBILEE PELHAM, LLC,  
 6 Claimant,  
 7  
 8 vs.  
 9 WB SERVICES, INC.; WATERBRIDGE CONTRACTORS  
 10 OF THE CAROLINAS, LLC; SUNBELT RENTALS, INC.  
 11 a/k/a SUNBELT RENTALS REGION 3; CBG MIDWEST  
 12 LLC d/b/a BOTZEM BROTHERS HARDWARE; BECKER  
 13 ELECTRIC, INC.; MAST, LLC; PALMETTO STATE  
 14 GLASS, INC.; COLLINS HAMMETT CONSTRUCTION, LLC;  
 15 EIFS & STUCCO, LLC; and PERFORMANCE PLUMBING,  
 16 Respondents.  
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 3 EXAMINATION PAGE  
 4 BY MR. MASSINGILL 4  
 5 CERTIFICATE OF REPORTER 35  
 6  
 7 EXHIBITS  
 8 (No exhibits marked.)  
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**Mar 06 2025**

**S.C. SUPREME COURT**

Page 2

1 A P P E A R A N C E S  
 2  
 3 ON BEHALF OF CLAIMANT:  
 4 GALLIVAN, WHITE & BOYD, PA  
 5 BY: CARTER R. MASSINGILL  
 6 55 Beattie Place, Suite 1200  
 7 Greenville, SC 29601  
 8  
 9 ON BEHALF OF WATERBRIDGE CONTRACTORS OF THE  
 10 CAROLINAS, LLC:  
 11 ROGERS TOWNSEND, LLC  
 12 BY: FRANKLIN H. "TREY" TURNER, III  
 13 PO Box 100200  
 14 Columbia, SC 29202  
 15  
 16 ON BEHALF OF BECKER ELECTRIC, INC.:  
 17 ELLER TONNSEN BACH, LLC  
 18 BY: EMILY GODWIN  
 19 1306 South Church Street  
 20 Greenville, SC 29605  
 21  
 22 ON BEHALF OF WB SERVICES, INC.:  
 23 HAYNSWORTH SINKLER BOYD  
 24 BY: CHRISTOPHER B. MAJOR  
 25 1 North Main Street, 2nd Floor  
 26 PO Box 2048 (29602-2048)  
 27 Greenville, SC 29601-2772  
 28  
 29 ON BEHALF OF THE DEPONENT:  
 30 LEVELSET  
 31 BY: NATE BUDDE  
 32 1121 Josephine Street  
 33 New Orleans, LA 70130  
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1 break at any time, let me know. I'll be glad to  
2 accommodate you. If I ask a question that's  
3 confusing or poorly asked, please stop and ask me  
4 to rephrase the question. Otherwise, I'll assume  
5 you understood the question; is that fair?

6 A. That sounds fair.

7 Q. Okay. And now -- you understand that  
8 you're under oath right now?

9 A. Yes, yes.

10 Q. And this is obviously informal. We're  
11 on Zoom. But your testimony is under oath just  
12 like it would be if you were standing in a  
13 courtroom. You understand that, right?

14 A. Yes.

15 Q. If I prompt you and say, Is that a yes,  
16 is that a no, I'm not try to be rude. I'm just  
17 trying to get a verbal record for the court  
18 reporter. She can only take down one person at a  
19 time.

20 A. Sure.

21 Q. And I'll try to do my best to not  
22 interrupt you so we can get questions and answers  
23 one at a time so the court reporter can have a  
24 clean transcript. Understood?

25 A. Understood.

1 MS. GODWIN: Hey, Carter, before  
2 you get into the meat and potatoes, I just wanted  
3 to interject really fast, and then I'll let  
4 you-all get at it.

5 Just for the record, I wanted to get in  
6 there. I represent Becker Electric, and I think  
7 I let everyone know that we are going to be in  
8 trial this week. We just got out of trial. I  
9 just want to put on the record for you and  
10 everyone here that we do object to these  
11 depositions of Charles Henson and Kailyn Turner,  
12 and we would like for the record to remain open  
13 considering that we haven't had the opportunity  
14 to adequately prepare.

15 Just want to get that on the record.  
16 Now, proceed. Thank you.

17 MR. MASSINGILL: Okay. Thanks.

18 Q. All right. Mr. Henson, what did you do  
19 to prepare for this deposition today?

20 A. I just looked at the subpoena and the  
21 letter by -- sent by -- is it Kristi? Kristi  
22 Johnson.

23 Q. Yeah. Did you look at any other  
24 documents or anything?

25 A. I looked through our system to see if I

1 like knew any of these parties. That's it, if  
2 they were like in our system.

3 Q. And did you look at the notice and  
4 certificate of mechanic's lien that was filed for  
5 JE&MA?

6 A. J-E-M-M-A?

7 Q. Yeah. We can look at it in a second.  
8 It's JE, and then an ampersand, MA.

9 A. I think so. I think I pulled it up.

10 Q. But other than looking briefly through  
11 some of the documents in your system and looking  
12 at the subpoena, you didn't do anything to  
13 prepare for today?

14 A. No, no. Just, you know, looked up how  
15 to attend a deposition.

16 Q. Can you tell me what you do for  
17 Levelset?

18 A. I manage a small team that fulfills one  
19 of our products for our customers. I manage a  
20 few people. I think like seven right now. It's  
21 a software company.

22 Q. Levelset is a software company?

23 A. Yes.

24 Q. And you said you manage a small team  
25 that fulfills certain products. What products

1 are you talking about?

2 A. Customers -- our customers can use our  
3 software to prepare and file mechanic's liens and  
4 other documents like that that go on the record.

5 Q. When you say other documents like that,  
6 what other -- what are some other documents like  
7 that that Levelset's software allows customers to  
8 prepare and file?

9 A. It would be documents related to  
10 construction payment, specifically related to  
11 mechanic's liens, lien cancellations, notices of  
12 project commencement, that sort of thing.

13 Q. Notice of furnishing?

14 A. Possibly, in certain states.

15 Q. And you do not have a JD or degree from  
16 any law school; is that correct?

17 A. That is correct.

18 Q. And so can you just tell me generally  
19 what your understanding of the purpose of filing  
20 a lien on a piece of property like the one in  
21 this case, what's the purpose of doing that?

22 A. The purpose would be to recoup payment  
23 in some way for unpaid labor.

24 Q. And you understand that the liens  
25 prevent the property from being sold without

1 paying unpaid amounts to the contractor, right?  
 2 A. Yes.  
 3 Q. And Levelset files these liens; is that  
 4 correct?  
 5 A. No, no.  
 6 Q. Explain that to me.  
 7 A. Our customers file liens. They can use  
 8 our software to prepare those liens, but Levelset  
 9 does not file liens.  
 10 Q. So, for example, in this case, we're  
 11 talking about this lien that was filed on Diamond  
 12 Jubilee's project by a company called JE&MA.  
 13 I'll call JE&MA, okay?  
 14 A. Okay.  
 15 Q. We're talking about this JE&MA lien. It  
 16 was filed in the Greenville County Register of  
 17 Deeds office.  
 18 A. Okay.  
 19 Q. Do you understand that?  
 20 A. Yes.  
 21 Q. And we can go ahead and look at the  
 22 lien. If you look at those exhibits, there's one  
 23 called -- it says JE&MA lien. It's like the  
 24 fourth or fifth one down.  
 25 A. Okay.

1 operating in. After putting in that information  
 2 to basically like a blank form is how I think of  
 3 it, the software -- they use a software to  
 4 generate the form, at which point it would be --  
 5 the document, the blank document, would be  
 6 executed and then forwarded on to the County.  
 7 Q. So the Levelset software generates this  
 8 form; is that correct?  
 9 A. Yes.  
 10 Q. And so when I say form, I'm referring to  
 11 this notice of mechanic's lien, so Levelset's  
 12 software generates this notice of mechanic's  
 13 lien, correct?  
 14 A. Yes. Our customers use the software to  
 15 generate the form.  
 16 Q. Yeah. But JE&MA didn't create this  
 17 form, right? Like they didn't physically create  
 18 it; it would be more accurate to say that  
 19 Levelset's software physically created this form,  
 20 correct?  
 21 A. I guess you could say that, but the  
 22 software wouldn't create it without JE&MA's input  
 23 if that makes sense.  
 24 Q. JE&MA is just filling in the blanks on  
 25 this form that was generated by Levelset,

1 Q. And you see where it says, Notice and --  
 2 notice of mechanic's lien, claimant without  
 3 direct contract with the owner. Do you see that?  
 4 A. I see that.  
 5 Q. And you see up in the top, there's kind  
 6 of a stamp where it says, Space above for  
 7 recorder's use.  
 8 A. Yes, I see that.  
 9 Q. And so how did this lien get recorded in  
 10 the Greenville County Register of Deeds office?  
 11 A. The lien was sent into a Greenville  
 12 County office, and it looks like from the stamp  
 13 it was E-recorded, so it looks like it was  
 14 E-recorded, E-filed, through their -- whatever  
 15 E-recording software system the County uses.  
 16 Q. So who sent the lien in to be E-filed?  
 17 A. JE&MA Enterprises would have sent the  
 18 lien to be E-filed using our software, Levelset.  
 19 Q. So tell me that how that works. How  
 20 does the software work?  
 21 A. Sure, yeah. Our customers put in  
 22 information pertaining to like whatever their  
 23 claim may be. Some of this information -- or  
 24 most of this information is going to be required  
 25 to appear on a lien in whatever state they're

1 correct?  
 2 A. Can you rephrase the question? I'm  
 3 sorry.  
 4 Q. Yeah. So is it accurate to say that  
 5 JE&MA is filling in the information necessary on  
 6 a form that was created by Levelset's software  
 7 for South Carolina?  
 8 A. Yeah, yeah. Yes.  
 9 Q. And so does Levelset's software create  
 10 different forms for different states based on  
 11 certain states' requirements?  
 12 A. Yeah. The customers can order -- like  
 13 say we're talking about liens. Customers can  
 14 order lien products for different states, and  
 15 those products are in line with statute of those  
 16 respective states.  
 17 Q. Right.  
 18 A. Yeah.  
 19 Q. So if we are on this -- we're still  
 20 looking at this lien here.  
 21 A. Sure.  
 22 Q. I'm going down to the second page, where  
 23 it says personally appeared, Charles Henson. Do  
 24 you see that?  
 25 A. I see that.

1 Q. This language, you know, starting with  
2 personally appeared down, you know, up to where  
3 it says, Important information and signature on  
4 following page, is that language generated by  
5 Levelset's software, with the exception of, you  
6 know, the date of -- the date that labor and  
7 materials were furnished, the description of the  
8 property, that sort of thing?

9 A. The -- are you talking about the  
10 language specifically that she/he is the  
11 authorized representative, et cetera, et cetera?

12 Q. Yes.

13 A. I would say -- that would -- yeah, that  
14 would appear on the form from Levelset. I think  
15 those are typically pulled directly from statute  
16 where the form is laid out.

17 Q. And so to what extent was there any  
18 lawyer involved with the preparation of this  
19 mechanic's lien?

20 A. I'm not sure. I'm not sure what JE&MA  
21 did. JE&MA would have been the folks who were,  
22 you know, preparing everything, you know, by  
23 going through the steps of like entering  
24 information. So, presumably, if there was an  
25 attorney involved, it would be with the claimant.

1 team, if you will.

2 Q. So who would have done that in this case  
3 for the property description we're looking at?

4 A. I'm not sure looking at this.

5 Q. But you were the person that signed this  
6 lien, correct?

7 A. Let's --

8 Q. Let's go down to the next page.

9 A. Yes, it looks like -- it looks like I  
10 signed this.

11 Q. And so you signed this without knowing  
12 who the team was that verified whether the  
13 property description was correct or not?

14 A. I may have known at the time. This  
15 looks to have been signed on September 3rd, 2020.  
16 But looking at this right now, the exhibit, which  
17 is the lien before me, I couldn't tell you. I  
18 just don't remember.

19 And looking at page 2, I would say that  
20 there's not a legal property description on this  
21 lien unless I misread that.

22 Q. Right. I was going to ask you about  
23 that. So down on page 2 where it says legal  
24 described as and there's no description beneath  
25 that, you would agree with me that that indicates

1 Q. Right. So at least from Levelset's  
2 involvement, there was no attorney involved with  
3 the generation of the language on this lien; it's  
4 just the software. Is that right?

5 A. Yes, yeah.

6 Q. And so if there is to be an attorney  
7 required to file the lien, is it your  
8 understanding that that's the responsibility of  
9 the claimant, not Levelset?

10 A. Yes.

11 Q. What does Levelset's software do to  
12 ensure that the property description is correct  
13 on the lien?

14 A. The property description is checked  
15 based on information provided by the end user  
16 from the claimant, and a team of individuals look  
17 up that property information, offer suggestions  
18 based on public record, like, Hey, this is what  
19 the assessor says, at which point the claimant  
20 will either need to -- will need to review and  
21 either accept or reject the use of that  
22 information.

23 Q. The team of individuals you referenced,  
24 is that your team that you said you oversee?

25 A. It's not. It's not. That's a research

1 there was not a legal description on this lien,  
2 correct?

3 A. Yes, I would agree that there's not a  
4 legal description, beyond the described address  
5 of 1371 Garlington Road, Greenville, South  
6 Carolina, 29615, and the county of Greenville  
7 County.

8 Q. So this team of people that you said  
9 will, you know, maybe look into whether the  
10 property description is correct and offer  
11 suggestions, does that include anybody that's a  
12 licensed attorney in South Carolina?

13 A. I don't believe so, no.

14 Q. Does Levelset perform any sort of title  
15 search in connection with verifying the legal  
16 description?

17 A. Somewhat. There's software out there  
18 that that team uses to pull information that's on  
19 the public record from something like a -- for  
20 example, a county tax assessor. I'm not fully  
21 familiar with their set of processes, but they  
22 would be checking against public record.

23 Q. And that's the same team that you don't  
24 believe includes an attorney licensed in South  
25 Carolina?

1 A. If they are a licensed attorney in South  
 2 Carolina, it would be unbeknownst to me.  
 3 Q. So who from Levelset gives this  
 4 mechanic's lien a final review to ensure that  
 5 it's accurate or proper before filing it?  
 6 A. A review of like accurate and --  
 7 Q. Well, let me ask it this way.  
 8 A. Yeah.  
 9 Q. So, Mr. Henson, you signed this lien on  
 10 page 3, right?  
 11 A. Sure.  
 12 Q. And did you review the lien at all  
 13 before you signed it?  
 14 A. I reviewed just easy things, like does  
 15 this fit in the margin requirements as set forth  
 16 by either the State or County and just made sure  
 17 that, you know, my signature was there.  
 18 Q. Now, you said you would review for easy  
 19 things like whether it fit in -- what kind of  
 20 requirements for the State or County?  
 21 A. Margins. Margins.  
 22 Q. What does that mean?  
 23 A. Margins, as in requirements set forth by  
 24 either the County or the State, it'll be  
 25 sometimes a statute that just says, Hey, when

1 you're recording this document with the proper  
 2 office, the margins must fit in with this certain  
 3 area, maybe it's an inch at the top, maybe it's  
 4 half an inch all around, maybe there are no  
 5 margin requirements. That's it.  
 6 Q. So you signed it without looking at  
 7 whether or not it included the day the materials  
 8 last furnished to the project?  
 9 A. I wouldn't review that information.  
 10 That's the claimant's information, and I would  
 11 have -- they would have to, you know, review that  
 12 themselves.  
 13 Q. Right. But would you make sure that  
 14 that information was included in there before you  
 15 signed it?  
 16 A. Only if it was provided by the claimant.  
 17 Q. Well, do you understand that that  
 18 information is necessary and required to file a  
 19 mechanic's lien in South Carolina?  
 20 A. It may be, but that would ultimately  
 21 fall on the responsibility of the claimant.  
 22 Q. Well, what's the purpose of you even  
 23 signing the lien?  
 24 A. That's a good question. I guess the  
 25 purpose would just be to execute the lien as

1 required to be filed.  
 2 Q. So after you executed it, who filed it?  
 3 A. Who filed it?  
 4 Q. Yeah.  
 5 A. That would be -- you said the Register  
 6 of Deeds filed it in their office, correct?  
 7 Q. No. It was -- the document was filed in  
 8 the Register of Deeds office. But it had to be  
 9 electronically filed by someone outside of the  
 10 Register of Deeds office, and I want to know -- I  
 11 know you said that the claimant can use you-all's  
 12 software to do X, Y, and Z, but ultimately who is  
 13 submitting this lien after it's been signed? Who  
 14 is submitting it to the Register of Deeds office  
 15 to be filed?  
 16 A. We forward the document on to the  
 17 Register of Deeds.  
 18 Q. And "we" meaning Levelset?  
 19 A. Yes.  
 20 Q. And I'm going down to this fourth page.  
 21 It's the verified statement of account.  
 22 A. Let's take a look. All right.  
 23 Q. And you signed that, correct?  
 24 A. I signed this, yes.  
 25 Q. And what was done to verify whether that

1 was actually the amount owed by you before  
 2 signing this?  
 3 A. An amount owed by -- I'm sorry?  
 4 Q. Yeah. Well, so you see how it says,  
 5 Balance due as of September 3rd, 2020, \$506,432?  
 6 Do you see that?  
 7 A. Yes, sir.  
 8 Q. What did you do to verify whether that  
 9 amount was correct before you signed this  
 10 verification on behalf of JE&MA?  
 11 A. Nothing personally.  
 12 Q. So you did nothing personally to certify  
 13 whether that was a true and correct statement of  
 14 account before you signed this verification; is  
 15 that correct?  
 16 A. That's correct.  
 17 Q. And did Levelset's software generate  
 18 this form too?  
 19 A. Oh, this page, yes.  
 20 Q. And then the claimant would just fill in  
 21 the amounts owed and the parties; is that right?  
 22 A. Yes. The claimant would fill in all the  
 23 facts here. You know, like that dollar amount  
 24 you just mentioned, \$506,432, they would have  
 25 entered that and all the facts.

1 Q. And then it's just provided to you for  
 2 signature?  
 3 A. Yes.  
 4 Q. Did you even read it before you signed  
 5 it?  
 6 A. Read -- just to make sure there's no  
 7 spelling errors or, you know -- you know, some  
 8 weird text overlap or something like that.  
 9 Q. Okay.  
 10 A. Not to read it in an attempt to review  
 11 any information or anything like that, as  
 12 provided by the claimant.  
 13 Q. And these may seem like obvious answers  
 14 to you, but, Mr. Henson, you're not and never  
 15 have been employed by JE&MA Enterprises, correct?  
 16 A. I am not.  
 17 Q. And you're not an officer of JE&MA  
 18 Enterprises?  
 19 A. Only in the capacity that they're using  
 20 Levelset as a means to execute their document.  
 21 Q. Right. And I think I understand what  
 22 you mean by that, but just to clarify, you're not  
 23 a member or shareholder or otherwise affiliated  
 24 with the corporate entity JE&MA Enterprises,  
 25 correct?

1 A. Correct.  
 2 Q. And you, Mr. Henson, are not a lawyer  
 3 that was retained by JE&MA, correct?  
 4 A. Correct.  
 5 Q. And so other than agreeing to file this  
 6 lien on behalf of JE&MA or signing the lien on  
 7 behalf of JE&MA, there's really not any other  
 8 nexus or connection between Mr. Henson and JE&MA,  
 9 correct?  
 10 A. Correct.  
 11 Q. So Levelset provided you with this  
 12 instrument for execution, correct?  
 13 A. Yes.  
 14 Q. And no one supervised you while you  
 15 executed the instrument?  
 16 A. Supervised, as in verified my identity  
 17 for like notarization or just supervised as --  
 18 what do you mean -- just, sorry, need  
 19 clarification.  
 20 Q. The better question would be, was there  
 21 anybody with you supervising you while you did  
 22 this, or were you just handling it by yourself  
 23 when you reviewed the instrument for execution?  
 24 A. The only capacity would be the notary  
 25 and any witnesses, as required by the form.

1 Q. So other than that, there was no one  
 2 else involved with the signature?  
 3 A. No.  
 4 Q. We can go back out to the Dropbox.  
 5 A. Okay.  
 6 Q. It's like the fourth item down. It  
 7 says, General description, Greenville County,  
 8 ROD.  
 9 A. Okay.  
 10 Q. And I'll represent to you this was just  
 11 the -- on the Greenville County Register of  
 12 Deeds, there's a link -- I mean, little tab that  
 13 says general, and you can click it, and it says,  
 14 you know, the parties and then it has a return  
 15 address. On this, we see the return address  
 16 is -- has a name, Levelset, with the address,  
 17 1121 Josephine Street; is that correct?  
 18 A. Yes, that's what I'm seeing here.  
 19 Q. Is that where your office is?  
 20 A. Yes.  
 21 Q. And would that indicate that Levelset  
 22 was the party that mailed this off to the  
 23 Register of Deeds office, consistent with what  
 24 you said earlier?  
 25 A. Yes.

1 Q. So we can go back to that lien now.  
 2 A. Okay.  
 3 Q. That was the fifth item down. It says  
 4 JE&MA lien. So if we go back to page 2 --  
 5 A. Okay.  
 6 Q. -- the statement beginning there on page  
 7 2, that's a sworn statement by you, correct?  
 8 A. Yes.  
 9 Q. And then down in the verification of  
 10 account, that's another sworn statement by you;  
 11 is that correct?  
 12 A. Yes.  
 13 Q. When you filed this lien on behalf of  
 14 JE&MA, did you have any idea of what sort of work  
 15 they did on the project?  
 16 A. I'm not sure. Not at the time -- maybe  
 17 at the time of processing this, but I couldn't  
 18 remember off the top of my head right now.  
 19 Q. How many liens do you think you've  
 20 executed that have been filed in the state of  
 21 South Carolina?  
 22 A. That's a good question. I couldn't give  
 23 an accurate number.  
 24 Q. Over 100?  
 25 A. Possibly, yes.

1 Q. Are there times where you've executed  
2 these liens where you have not known what sort of  
3 work the claimant did on the project?

4 A. I mean, I may not have any like personal  
5 knowledge, but that information, I believe, is  
6 required to be provided by the claimants. So  
7 that claimant information, I wouldn't necessarily  
8 review. It would be up to their counsel or  
9 themselves to understand whether or not they --  
10 whatever their labor is and whether or not it's  
11 entered into the form.

12 Q. Does Levelset advise their customers  
13 when it may be required in a given jurisdiction  
14 to have an attorney file a mechanic's lien?

15 A. That information may be available on  
16 Levelset.com. We have frequently asked questions  
17 available to parties. That being said, we  
18 don't -- we don't provide any sort of legal  
19 advice. But there are places, you know, that I  
20 know that like attorneys generally need to be  
21 present. I think like Hawaii is a state like  
22 that.

23 Q. Do you know if South Carolina is a state  
24 like that?

25 A. Not off the top of my head.

1 A. I do.

2 Q. What did you do to ensure that was an  
3 actual license number before signing this?

4 A. Personally, I did nothing.

5 Q. So how could you sign this document  
6 under penalty of perjury if you did nothing to  
7 ensure whether the information contained in this  
8 document is accurate?

9 A. Our customers --

10 MR. BUDDE: Calling for a legal  
11 conclusion.

12 MR. MASSINGILL: Hey, Nate, I'm not  
13 sure if you're licensed in the state of South  
14 Carolina, but we can object to the form of  
15 questions, and that's it. There are no speaking  
16 objections. So to the extent you are licensed in  
17 this state, I'm happy to let you make that  
18 objection, but Mr. Henson still needs to answer  
19 the question.

20 A. Can you repeat the question?

21 Q. Sure. So when you signed this document  
22 under penalty of perjury, you didn't do anything  
23 to personally verify whether the information  
24 contained in the document was accurate; is that  
25 correct?

1 Q. But to be clear, JE&MA did not file this  
2 lien with the Register of Deeds, right? Levelset  
3 performed that action?

4 A. I would say JE&MA filed the lien with  
5 the Register of Deeds using Levelset's software,  
6 where the document was forwarded on to the  
7 County, just a simple forwarding process.

8 Q. Right. But let's be clear. Levelset  
9 forwarded the document to the Register of Deeds,  
10 correct?

11 A. Yes.

12 Q. And you, Mr. Henson, signed the lien,  
13 correct?

14 A. Correct.

15 Q. And you signed the verification of  
16 account, correct?

17 A. Correct.

18 Q. If we look back up to page 3 --

19 A. Okay.

20 Q. -- I'm looking right above where it says  
21 signature of claimant verification. It says, If  
22 the petitioner is required to be licensed or  
23 registered as contemplated by SC Code 29-5-15,  
24 that SC license or registration number is  
25 1000000. Do you see that?

1 A. I didn't do anything personally, no.

2 Our customers enter the facts and they agree when  
3 using our software that the information they are  
4 providing via the software is factual and true,  
5 and we operate under that assumption.

6 Q. So just hypothetically, JE&MA could have  
7 said that they're owed \$500,000 more than they  
8 actually were, and they would have, according to  
9 your software, had to verify that that  
10 information was correct, but you would just have  
11 to take it on their word. Is that accurate?

12 A. Yes.

13 Q. So if you go back up to the first page  
14 again -- or excuse me, this is the second page.

15 A. Second page?

16 Q. Yeah.

17 A. Okay.

18 Q. Where it says, Personally appeared  
19 again, so I'm down here in the third paragraph.

20 A. Where it reads, The owner authorized  
21 that this labor, et cetera?

22 Q. Yeah, yeah. I'm going to the fourth  
23 paragraph. It says, By the serving and filing of  
24 this mechanic's lien, the petitioner has and  
25 claims a mechanic's lien for the payment of

1 indebtedness aforesaid and the cost of enforcing  
2 its lien upon the following described property,  
3 including its buildings and structures. Do you  
4 see that, sir?

5 A. Yes.

6 Q. And so here, this is explaining JE&MA's  
7 rights and entitlements relating to the filing of  
8 lien; is that right?

9 A. Yes.

10 Q. And you would agree with me that filing  
11 a mechanic's lien in South Carolina requires an  
12 understanding of the specific requirements of the  
13 state, as it pertains to statutory requirements  
14 for mechanic's liens?

15 MS. GODWIN: Object to the form.

16 A. Can you rephrase that? I'm sorry.

17 Q. Yeah. Would you agree that filing a  
18 mechanic's lien in South Carolina requires an  
19 understanding of the law in this state?

20 A. I would agree.

21 MS. GODWIN: Object to the form.

22 Q. And if you could go back out to the  
23 documents that were uploaded to the Dropbox.

24 A. Okay.

25 Q. In the second document, it says, Code of

1 all the specific legal requirements of this  
2 mechanic's lien statute were?

3 A. No. JE&MA filed the lien. It would be,  
4 in my opinion, their responsibility to  
5 familiarize themselves with the statutes and  
6 understand their legal position.

7 Q. And what do you base that contention on?

8 A. They are a potential lien claimant in,  
9 in this case, South Carolina.

10 Q. They didn't sign the lien, did they,  
11 sir?

12 A. I believe -- I mean, looking at the  
13 lien -- I mean, I don't have it pulled back up.  
14 I have this statute pulled back up. The claimant

15 is JE&MA, and it looks like --

16 Q. You can go back and --

17 A. Go ahead. I'm sorry.

18 Q. You can go back and look at the lien.  
19 It's the fifth item down.

20 A. All right. Let's look at it. I would  
21 say that JE&MA executed the lien via me as  
22 authorized agent. It says here underneath the  
23 signature, JE&MA Enterprises, LLC.

24 Q. Right. And you have zero affiliation  
25 with JE&MA, outside of being the signatory on

1 laws, title 29.

2 A. Chapter 5.

3 Q. Yep.

4 A. Okay.

5 Q. And it's entitled mechanic's liens.

6 A. Okay.

7 Q. Have you ever read this statute before?

8 A. I couldn't pinpoint a time where I read  
9 through the whole thing.

10 Q. Okay. Well, I mean, do you recall  
11 generally ever sitting down to familiarize  
12 yourself with the statute in South Carolina as  
13 governing filing of mechanic's liens?

14 A. Only as it pertains to, like I mentioned  
15 earlier, requirements in terms of how the form  
16 must appear before the Register of Deeds, any  
17 fees associated, that sort of thing.

18 Q. So other than the margins of the  
19 documents and potential fees associated with it,  
20 have you ever sat down to familiarize yourself  
21 with the legal requirements of the statute for  
22 filing a mechanic's lien in South Carolina?

23 A. Outside of recording requirements, no.

24 Q. And so you filed this instrument with  
25 the Register of Deeds office without knowing what

1 this document; is that correct?

2 A. Correct.

3 Q. And so other than the fact that it says  
4 JE&MA Enterprises, LLC, underneath your  
5 signature, there's nothing on this document  
6 indicating that this was executed by JE&MA.  
7 Would you agree with that?

8 A. Outside of the execution field?

9 Q. Yes.

10 A. I would agree then, yes.

11 Q. We can go back to the documents that  
12 were uploaded. I think the last one says, South  
13 Carolina mechanic's liens, everything you need to  
14 know.

15 A. Okay. Let's see. Here we go.

16 Q. And I'll represent to you that I just  
17 printed out this South Carolina mechanic's lien  
18 guide and frequently asked questions page from  
19 Levelset's website.

20 A. Okay.

21 Q. Does Levelset do this for every state?

22 A. I think so, yes.

23 Q. The second sentence -- or excuse me, the  
24 second sentence in this paragraph right here  
25 says, A mechanic's lien is a legal tool. Do you

1 see that, sir?  
 2 A. I do.  
 3 Q. And then it says, This page breaks down  
 4 the rules and requirements and deadlines you need  
 5 to follow to file a South Carolina mechanic's  
 6 lien. Do you see that?  
 7 A. I do.  
 8 Q. So, here, Levelset is providing a  
 9 breakdown regarding the legal rules,  
 10 requirements, and deadlines under the law to file  
 11 a mechanic's lien?  
 12 A. Yeah, yeah. This is all public record,  
 13 I believe.  
 14 Q. Okay.  
 15 A. Statutes and whatnot.  
 16 Q. Right. And so by at least this page of  
 17 the website, Levelset is providing its audience  
 18 information about South Carolina law and how that  
 19 relates to filing of mechanic's liens, correct?  
 20 A. Yes.  
 21 Q. All right. Mr. Henson, I think I'm  
 22 almost done. Bear with me. I'm just going to  
 23 look at my notes really quickly.  
 24 A. Take your time.  
 25 MR. MASSINGILL: All right.

1 CERTIFICATE OF REPORTER  
 2 STATE OF SOUTH CAROLINA  
 3 COUNTY OF CHARLESTON  
 4  
 5 I, Teri L. Kennelly, Registered  
 6 Professional Reporter and Notary Public for the  
 7 State of South Carolina at Large, do hereby  
 8 certify that the witness in the foregoing  
 9 deposition was by me duly sworn to testify to the  
 10 truth, the whole truth and nothing but the truth  
 11 in the within-entitled cause; that said  
 12 deposition was taken at the time and location  
 13 therein stated; that the testimony of the witness  
 14 and all objections made at the time of the  
 15 examination were recorded stenographically by me  
 16 and were thereafter transcribed by computer-aided  
 17 transcription; that the foregoing is a full,  
 18 complete and true record of the testimony of the  
 19 witness and of all objections made at the time of  
 20 the examination; and that the witness was given  
 21 an opportunity to read and correct said  
 22 deposition and to subscribe the same.  
 23 Should the signature of the witness  
 24 not be affixed to the deposition, the witness  
 25 shall not have availed himself/herself of the  
 opportunity to sign or the signature has been  
 waived.  
 I further certify that I am neither  
 related to nor counsel for any party to the cause  
 pending or interested in the events thereof.  
 Witness my hand, I have hereunto  
 affixed my official seal on October 30th, 2022,  
 at Charleston, Charleston County, South Carolina.  
  
 Teri L. Kennelly, RPR, CRP  
 NCRA REGISTERED REALTIME REPORTER  
 My Commission expires  
 January 8, 2029

1 Mr. Henson, I appreciate your time. I don't  
 2 think I have any more questions for you. I'm not  
 3 sure if any of the other lawyers will or not, but  
 4 I'll pass you off to them. Appreciate your time.  
 5 Thank you, sir.  
 6 THE WITNESS: Okay. Thank you.  
 7 MR. MASSINGILL: Anybody else?  
 8 MR. TURNER: This is Trey. Nothing  
 9 from me.  
 10 MS. GODWIN: This is Emily. We're  
 11 just retaining our objection. Nothing now, thank  
 12 you.  
 13 MR. MASSINGILL: All right.  
 14 Mr. Henson, I think you're free to go.  
 15 (The deposition was concluded at  
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