

RECEIVED

Mar 06 2025

S.C. SUPREME COURT

**From:** Townes Johnson  
**Sent:** 9/20/2023 3:23:38 PM  
**To:** nate@zlien.com  
**Cc:** Michelle Morgan; Mirelle Placencia  
**Subject:** Re: Levelset lien - unauthorized practice of law allegation to void lien  
**Attachments:** 9.20.23 Demand to Levelset.pdf  
**Importance:** High

**Via Email and Certified Mail: 7019 1640 0000 4835 0538**

Nate -

Attached, please find my correspondence of today demanding that Levelset make JE&MA whole.

Regards,

Townes

---

**From:** Townes Johnson <tjohnson@sc.legal>  
**Sent:** Wednesday, August 23, 2023 4:06 PM  
**To:** nate@zlien.com <nate@zlien.com>  
**Cc:** cmassingill@gwblawfirm.com <cmassingill@gwblawfirm.com>; dpowers@gwblawfirm.com <dpowers@gwblawfirm.com>; Michelle Morgan <assistant@sc.legal>  
**Subject:** Re: Levelset lien - unauthorized practice of law allegation to void lien

Nate -

Here is the formal order declaring JE&MA's lien is void and unenforceable due to Levelset's unauthorized practice of law. Please let me know if Levelset has any desire in making JE&MA whole.

If you would like to discuss, my cell is 864-325-2528.

Townes

---

**From:** Townes Johnson <tjohnson@sc.legal>  
**Sent:** Tuesday, June 27, 2023 11:40 AM  
**To:** nate@zlien.com <nate@zlien.com>  
**Cc:** cmassingill@gwblawfirm.com <cmassingill@gwblawfirm.com>; dpowers@gwblawfirm.com <dpowers@gwblawfirm.com>; Michelle Morgan <assistant@sc.legal>  
**Subject:** Re: Levelset lien - unauthorized practice of law allegation to void lien

Nate -

Please be advised that the Honorable Lawton McIntosh, Circuit Court judge, ruled today that my client's lien is void and unenforceable due to Levelset's unauthorized practice of law.

Once a formal order is filed, I will provide you a copy of same.

As stated below, JE&MA will now be looking to Levelset to be made whole.

Please give me a call to discuss at your convenience. My cell number is 864-325-2528.

Townes

--

**From:** Townes Johnson

**Sent:** Thursday, May 4, 2023 5:42 PM

**To:** nate@zlien.com <nate@zlien.com>

**Cc:** cmassingill@gwblawfirm.com <cmassingill@gwblawfirm.com>; dpowers@gwblawfirm.com <dpowers@gwblawfirm.com>; Michelle Morgan <assistant@sc.legal>

**Subject:** RE: Levelset lien - unauthorized practice of law allegation to void lien

**Via Email and Certified Mail: 7019 1640 0000 4835 0613**

Nathan Lorenzen Budde  
Express Lien, Inc dba Levelset  
1121 Josephine St  
New Orleans, LA 70130

May 4, 2023

Nate –

Following up on the email below, attached, please find notice of the hearing for the Court to decide whether JEMA's lien is illegal, void and/or unenforceable due to Levelset's unauthorized practice of law.

**The hearing has been set for 6/27/2023 at 10:30 AM Eastern.**

I look forward to hearing from you,

Townes Johnson

Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.

---

**From:** Townes Johnson

**Sent:** Friday, April 14, 2023 12:34 PM

**To:** nate@zlien.com

**Cc:** cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan <assistant@sc.legal>  
**Subject:** Levelset lien - unauthorized practice of law allegation to void lien

**Via Email and Certified Mail: 7019 1640 0000 4835 0569**

Nathan Lorenzen Budde  
Express Lien, Inc dba Levelset  
1121 Josephine St  
New Orleans, LA 70130

April 14, 2023

Nate –

I represent JE&MA Enterprises, LLC (“JEMA”) in an action pending in Greenville County, South Carolina. As you may be aware from the deposition of Charles Henson on October 19, 2022, JEMA filed a lien through Levelset on certain property owned by Diamond Jubilee Pelham, LLC (“Owner”).

In the lien foreclosure action, Owner is taking the position that Levelset’s unauthorized practice of law in SC makes JEMA’s lien illegal, void and unenforceable. I agree with Owner that this issue needs to be resolved and have just filed for Summary Judgement for the Court to make a declaratory judgment.

Accordingly, I am hereby giving Levelset notice of the pendency of this issue and the opportunity to intervene and defend Levelset’s actions. JEMA obviously relied on Levelset and will be looking to Levelset should the Court find that JEMA’s lien illegal, void and unenforceable due to Levelset’s unauthorized practice of law.

I have attached a copy of Owner’s Answer and Counterclaim in the action (which includes the deposition of Charles Henson) for your review.

I look forward to hearing from you,

Townes Johnson

Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.

**From:** Townes Johnson  
**Sent:** 8/23/2023 3:06:29 PM  
**To:** nate@zlien.com  
**Cc:** cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan  
**Subject:** Re: Levelset lien - unauthorized practice of law allegation to void lien  
**Attachments:** 18. FILED Order.pdf

Nate -

Here is the formal order declaring JE&MA's lien is void and unenforceable due to Levelset's unauthorized practice of law. Please let me know if Levelset has any desire in making JE&MA whole.

If you would like to discuss, my cell is 864-325-2528.

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1121 Josephine St  
New Orleans, LA 70130

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Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.

**From:** Townes Johnson  
**Sent:** 6/27/2023 10:40:38 AM  
**To:** nate@zlien.com  
**Cc:** cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan  
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Carter Massingill, Esq.

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**Subject:** Levelset lien - unauthorized practice of law allegation to void lien

**Via Email and Certified Mail: 7019 1640 0000 4835 0569**

Nathan Lorenzen Budde  
Express Lien, Inc dba Levelset  
1121 Josephine St  
New Orleans, LA 70130

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In the lien foreclosure action, Owner is taking the position that Levelset’s unauthorized practice of law in SC makes JEMA’s lien illegal, void and unenforceable. I agree with Owner that this issue needs to be resolved and have just filed for Summary Judgement for the Court to make a declaratory judgment.

Accordingly, I am hereby giving Levelset notice of the pendency of this issue and the opportunity to intervene and defend Levelset’s actions. JEMA obviously relied on Levelset and will be looking to Levelset should the Court find that JEMA’s lien illegal, void and unenforceable due to Levelset’s unauthorized practice of law.

I have attached a copy of Owner’s Answer and Counterclaim in the action (which includes the deposition of Charles Henson) for your review.

I look forward to hearing from you,

Townes Johnson

Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.

**From:** Townes Johnson  
**Sent:** 5/26/2023 5:43:57 PM  
**To:** Nate Budde  
**Subject:** Re: JEMA Lien - Levelset

Nate -

Thanks for the email. I don't think JEMA has proper standing to address the UPL issue on Levelset's behalf, but I'm happy to join Levelset in advocating for the validity of the lien.

Townes

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**From:** Nate Budde <nate@levelset.com>  
**Sent:** Friday, May 26, 2023 3:33:34 PM  
**To:** Townes Johnson <tjohnson@sc.legal>  
**Subject:** JEMA Lien - Levelset

Mr. Johnson,

I wanted to follow up on previous communication re: your informing Levelset of the UPL issue raised and potential to intervene. While Levelset does not currently think intervening directly is necessarily the best move, we are interested in the possibility of providing you assistance through ghost-writing the briefing of the UPL issue. This way we can present the arguments that would work to our mutual benefit, without necessitating our formal intervention even if possible.

To that end, I would like to put you in touch with an attorney who is very well-versed in South Carolina UPL law and also Levelset's business. Please confirm that you'd be open to me sharing your contact information and making an introduction for those purposes.

Thank you, and I am hopeful that this issue can ultimately be resolved in your favor for many reasons, and that your client is able to recover the amounts they earned for their provision of labor/material to the project at issue.

Sincerely,  
Nate

**From:** Nate Budde  
**Sent:** 5/26/2023 2:32:51 PM  
**To:** Townes Johnson  
**Subject:** JEMA Lien - Levelset

Mr. Johnson,

I wanted to follow up on previous communication re: your informing Levelset of the UPL issue raised and potential to intervene. While Levelset does not currently think intervening directly is necessarily the best move, we are interested in the possibility of providing you assistance through ghost-writing the briefing of the UPL issue. This way we can present the arguments that would work to our mutual benefit, without necessitating our formal intervention even if possible.

To that end, I would like to put you in touch with an attorney who is very well-versed in South Carolina UPL law and also Levelset's business. Please confirm that you'd be open to me sharing your contact information and making an introduction for those purposes.

Thank you, and I am hopeful that this issue can ultimately be resolved in your favor for many reasons, and that your client is able to recover the amounts they earned for their provision of labor/material to the project at issue.

Sincerely,  
Nate

**From:** Townes Johnson  
**Sent:** 5/9/2023 5:27:13 PM  
**To:** Nate Budde  
**Cc:** nate@zlien.com; cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan  
**Subject:** RE: Levelset lien - unauthorized practice of law allegation to void lien

Nate –

All of the filings can be located here:

<https://communicate.smokeball.com/files.html?id=56ad935f-232d-42bd-bd5c-edb85acf22cf>

I am not planning on briefing the unauthorized practice of law issue for the hearing, but am going to defend the lien.

The GC is in bankruptcy so I doubt much will ever come from the default judgment. The only viable recourse now is through the lien so this issue has certainly not been negated. JEMA relied on Levelset and requests that Levelset defend its actions.

Townes

---

**From:** Nate Budde <nate@levelset.com>  
**Sent:** Tuesday, May 9, 2023 5:52 PM  
**To:** Townes Johnson <tjohnson@sc.legal>  
**Cc:** nate@zlien.com; cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan <assistant@sc.legal>  
**Subject:** Re: Levelset lien - unauthorized practice of law allegation to void lien

Mr. Johnson,

Thank you for reaching out. While Levelset strenuously denies any allegation that it was involved in the unauthorized practice of law, and additionally, that any lien created through the use of Levelset's software would be invalid merely due to the use of Levelset, we appreciate you informing us of the upcoming hearing.

In order for Levelset to determine if it wishes to intervene, could you please provide us with the relevant motions and any responses? We were unable to find the summary judgment motion in a review of the available sources. Additionally, we did notice that a default judgment was obtained for a significant amount in this dispute. Could you provide clarity as to whether the default judgment obtained negates the issue, as the judgment can presumably be enforced irrespective of the lien claim at issue?

Thank you,  
Nate

On Thu, May 4, 2023 at 4:42 PM Townes Johnson <[tjohnson@sc.legal](mailto:tjohnson@sc.legal)> wrote:

**Via Email and Certified Mail: 7019 1640 0000 4835 0613**

Nathan Lorenzen Budde  
Express Lien, Inc dba Levelset  
1121 Josephine St  
New Orleans, LA 70130

May 4, 2023

Nate –

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Townes Johnson

Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.

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**To:** [nate@zlien.com](mailto:nate@zlien.com)

**Cc:** [cmassingill@gwblawfirm.com](mailto:cmassingill@gwblawfirm.com); [dpowers@gwblawfirm.com](mailto:dpowers@gwblawfirm.com); Michelle Morgan <[assistant@sc.legal](mailto:assistant@sc.legal)>

**Subject:** Levelset lien - unauthorized practice of law allegation to void lien

**Via Email and Certified Mail: 7019 1640 0000 4835 0569**

Nathan Lorenzen Budde  
Express Lien, Inc dba Levelset  
1121 Josephine St  
New Orleans, LA 70130

April 14, 2023

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Accordingly, I am hereby giving Levelset notice of the pendency of this issue and the opportunity to intervene and defend Levelset's actions. JEMA obviously relied on Levelset and will be looking to Levelset should the Court find that JEMA's lien illegal, void and unenforceable due to Levelset's unauthorized practice of law.

I have attached a copy of Owner's Answer and Counterclaim in the action (which includes the deposition of Charles Henson) for your review.

I look forward to hearing from you,

Townes Johnson

Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.

**From:** Nate Budde  
**Sent:** 5/9/2023 4:51:49 PM  
**To:** Townes Johnson  
**Cc:** nate@zlien.com; cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan  
**Subject:** Re: Levelset lien - unauthorized practice of law allegation to void lien

Mr. Johnson,

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Thank you,  
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On Thu, May 4, 2023 at 4:42 PM Townes Johnson <tjohnson@sc.legal> wrote:

**Via Email and Certified Mail: 7019 1640 0000 4835 0613**

Nathan Lorenzen Budde

Express Lien, Inc dba Levelset

1121 Josephine St  
New Orleans, LA 70130

May 4, 2023

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Cc: Duffie Powers, Esq.

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I have attached a copy of Owner’s Answer and Counterclaim in the action (which includes the deposition of Charles Henson) for your review.

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Townes Johnson

Cc: Duffie Powers, Esq.

Carter Massingill, Esq.

**From:** Townes Johnson  
**Sent:** 5/4/2023 4:42:10 PM  
**To:** nate@zlien.com  
**Cc:** cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan  
**Subject:** RE: Levelset lien - unauthorized practice of law allegation to void lien  
**Attachments:** Motion "MSUMJM-Plt/Je&Ma Enterprises/Motion/Summary Judgment" for Case "2020CP2305689- JE&MA Enterprises LLC vs. WB Services Inc , defendant, et al" was added to a Motions Roster for 6/27/2023 at 10:30 AM

**Via Email and Certified Mail: 7019 1640 0000 4835 0613**

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1121 Josephine St  
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Townes Johnson

Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.

**From:** Townes Johnson  
**Sent:** 4/14/2023 11:34:18 AM  
**To:** nate@zlien.com  
**Cc:** cmassingill@gwblawfirm.com; dpowers@gwblawfirm.com; Michelle Morgan  
**Subject:** Levelset lien - unauthorized practice of law allegation to void lien  
**Attachments:** 10. FILED Diamond Jubilee's Answer to Plaintiff's Complaint & CC.pdf

**Via Email and Certified Mail: 7019 1640 0000 4835 0569**

Nathan Lorenzen Budde  
Express Lien, Inc dba Levelset  
1121 Josephine St  
New Orleans, LA 70130

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Cc: Duffie Powers, Esq.  
Carter Massingill, Esq.



Townes B. Johnson III  
(864) 757-4889  
tjohnson@sc.legal

April 14, 2023

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Express Lien, Inc dba Levelset  
1121 Josephine St  
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