

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS
JUDICIAL CIRCUIT

COUNTY OF Richland

CASE NO. 2024-CP-40-03931

PROFESSIONAL FINANCIAL SERVICES

Plaintiff,

MOTION AND ORDER
INFORMATION
FORM AND COVERSHEET

Tremaine Bolson vs. Tremaine D. Bolson
Brittney L. Greene aka Brittney L. Bolson
Defendant.

RECEIVED

MAR 13 2025

SC Court of Appeals

2025 MAR 13 PM 3:01
CLERK OF COURT
RICHLAND COUNTY

Plaintiff's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____	Defendant's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information Nature of Motion: <u>Stay of Execution while Pending Appeal</u> Estimated Time Needed: _____ Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	
SECTION II: Motion/Order Type <input type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order. <u>Tremaine Bolson</u> _____ <u>3/13/2025</u> Signature of Attorney for <input type="checkbox"/> Plaintiff / <input checked="" type="checkbox"/> Defendant Date submitted	
SECTION III: Motion Fee <input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: <ul style="list-style-type: none"> <input type="checkbox"/> Cause in Child or Spousal Support <input type="checkbox"/> Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCF) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____	
JUDGE'S SECTION <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____

CLERK'S VERIFICATION

Collected by: _____ Date Filed: _____

MOTION FEE COLLECTED: \$ _____

CONTESTED - AMOUNT DUE: \$ _____

SCCA 233 (11/2003)

IN THE COURT OF COMMON PLEAS
1701 MAIN STREET COLUMBIA SC 29201
STATE OF SOUTH CAROLINA

RECEIVED
MAR 13 2025
SC Court of Appeals

Professional Financial Services,

Respondent,

)
)
)
)

Case No. 2024-CP-40-03931
Appellate Case No. 2025-000397

-vs-

Brittney L. Greene a/k/a Brittney L. Golson,
Tremaine Golson a/k/a Tremaine D. Golson

Appellants,

)
)
)
)
)
)
)

)Motion to Stay Execution of Judgement
)Pending Appeal

2025 MAR 13 PM 3:01
FILED
SOUTH CAROLINA
COUNTY

We are writing to respectfully request a stay of the enforcement of the judgement or order entered on March 3, 2025 in the above-captioned case, pending resolution of the appeal filed on March 3, 2025. The notice of appeal was properly served on parties certified mail receipt #9589 0710 5270 0023 8613 57. I seek this stay to maintain the status quo pending the resolution of my appeal.

Background**

1. On March 3, 2025, the court entered an order judgement in favor of Professional Financial Services.
2. The undersigned filed a notice of appeal within the thirty days after receipt of a written notice of entry of order or judgement as required by law.
3. The appeal has been assigned case number 2025-000397 In the Court of Appeals

Grounds for Motion to Stay**

****Irreparable Harm****

1. The Enforcement of the judgement at this stage would cause irreparable harm such as financial ruin, which may not be possible to recover if the appeal is successful.

2. If the judgement is enforced, I will be required to pay a certain amount immediately, this would severely impact my financial stability.
3. Enforcement of this judgement will lead to repossession of our vehicle, which is my primary means of transportation for work. Losing the vehicle would not only disrupt our employment but would also cause lasting financial implications that cannot be remedied if the appeal succeeds.

****Substantial Legal Concerns****

1. Judicial Bias which was an unjust advantage to the opposing parties
2. Improper Service on several attempts, which affected the ability to prepare or respond
3. Due Process Concerns
4. Misrepresentation by the Opposing Party

I am confident in the merits of this appeal and believe that there is a strong likelihood for success. Therefore, I respectfully request the Court to grant a stay of execution to prevent any irreparable harm and to allow the appellate process to fully address these important legal questions during briefing.

Kevin Adams 3/13/2025
Bty Green 3/13/2025
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