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**Apr 16 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Milton G Kimpson, Circuit Court Judge

Appellate Case No. 2025-000397

Case No. 2024-CP-40-03931

Professional Financial Services  
Respondent,

v.

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

Appellants,

RICHLAND COUNTY  
FILED  
JEANETTE W. McBRIDE  
2025 APR 16 PM 2:01

**PROOF OF SERVICE**

I certify that I have served the Reply to Plaintiff Motion of Stay of Execution of Judgement Pending Appeal on John S. Kay attorney for Hutchens Law Firm LLP on record for Professional Financial Services by depositing a copy of it in the United States Mail, certified mail 9589 0710 5270 0023 8531 16 on April 14, 2025, addressed to attorney of record, in care of John S. Kay at 240 Stoneridge Drive, Suite 400 Columbia SC 29210.

**Courts Served:** Office of the Court of Appeals [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
**Means of Delivery:** via email only

In the Court of Common Pleas in person @1701 Main Street Columbia SC 29201

s/ Tremaine Golson a/k/a Tremaine D. Golson ,  
Brittney L. Greene a/k/a Brittney L. Golson  
7628 Stone Street  
Columbia SC 29209  
(803)309-9064

rights as an appellant. Specifically, misrepresentation, Improper Service and due process concerns under the 14th Amendment. And questions of Judicial bias. Such actions undermine the impartiality of the judicial process and necessitate a stay to ensure that my appeal is heard fairly and without undue interference.

**\*\*Judicial Impartiality and Independent Review\***

Given the substantial legal concerns I raised, it's imperative to ensure an impartial review of the motion to stay of execution. While the original judge may typically decide on such matters, my concerns regarding judicial bias underscores the need for a neutral examination of the case. An independent review by another judge or a higher court can provide a fresh perspective and help assure that my due process rights under the 14th amendment are thoroughly protected. Being that I am raising questions about judicial bias should be justified for a stay while currently in appeals.

**\*\*Constitutional Concerns\*\***

The demand for an immediate bond payment without consideration of irreparable harm and substantial legal questions involved, raises 4th and 6th Amendments. As established in *\*Winter v. Natural Resources Defense Counsel \**, 555 U.S. 7 (2008) It's essential that the appellate review handle these affairs impartially, while allowing a stay of judgment ensuring constitutional protections are upheld.

**\*\*Now In Appeals\*\***

Given these circumstances, I respectfully request this court to consider my motion for a stay of execution of judgement, now that I am in appeals. **\*\*Rule 241, South Carolina Appellate Court Rules\*\*** Under SCACR Rule 241, staying pending appeal can be granted if there is a showing of probable cause for appeal and demonstration of potential irreparable harm if a stay is not granted. Both conditions are present in this case, strengthening the need for a stay. Given the Circumstances the plaintiff's failure to address my concerns and questions to influence the court's decisions justify a temporary halt in proceedings to protect my rights and ensure a fair appeal process. Furthermore, a stay would prevent irreparable harm, even more due process violations under the 14 amendment, unreasonable seizure under the 4th amendment and even more equal protection under the 6th amendment.

Furthermore, a stay would result from premature execution of the judgement, aligning with the principles of justice and fairness that underpin our legal system.

I respectfully request that the court grants a stay of execution to prevent unjust and irreparable consequences and to allow for a fair review of my case by the appellate court.

Thank you for considering my request for a stay of execution, now in appeals.

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