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SC Court of Appeals

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

APPEAL FROM THE COURT OF COMMON PLEAS

RICHLAND COUNTY

Hon. Milton G. Kimpson, Circuit Court Judge

Case No.: 2024-CP-40-03931

Appellate Case No.: 2025-000397

Professional Financial Services, Respondent,

v.

Tremaine Golson a/k/a Tremaine D. Golson and

Brittney L. Greene a/k/a Brittney L. Golson, Appellants.

APPELLANTS' INITIAL BRIEF

Submitted by:

Tremaine Golson a/k/a Tremaine D. Golson

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

1849 Sandy Ridge Ct

Carrollton, TX 75007

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Pro Se Appellant

STATEMENT OF ISSUES ON APPEAL

1. Whether the trial court erred in granting summary judgment where genuine issues of material fact remained.
2. Whether the trial court erred in entering judgment in favor of a party who lacked standing and failed to produce a valid chain of title.
3. Whether the trial court failed to consider material nondisclosures and unjust enrichment arising from an improperly structured financial agreement.

STATEMENT OF THE CASE

This appeal arises from a dispute involving the repossession of a vehicle and a resulting money judgment against Appellants Brittney L. Greene aka Brittney L. Golson and Tremaine Golson aka Tremain D. Golson. The Respondent, Brittney L. Greene aka Brittney L. Golson, was not a party to the original transaction involving the Appellants but claimed the right to enforce a financial agreement against them. The trial court denied Appellants' motion to dismiss and subsequently granted summary judgment in favor of the Respondent. Appellants now seek reversal, asserting the Respondent lacked standing, failed to demonstrate a valid chain of title, and failed to comply with required consumer disclosures.

STANDARD OF REVIEW

Summary Judgment: Reviewed de novo. Summary judgment is proper only where there is no genuine issue of material fact. *Baughman v. AT&T*, 306 S.C. 101 (1991). Standing and Contract Formation: Reviewed de novo, as they are legal questions.

ARGUMENT

- A. Summary Judgment Was Improper Where Disputed Facts Exist
- B. Arbitration Was Not Applicable to the Contract at Issue
- C. Respondent Failed to Prove Standing or Chain of Title
- D. The Contract Fails for Lack of Consideration and Required Disclosures
- E. Respondent Was Unjustly Enriched

RELIEF REQUESTED

Appellants respectfully request that this Court:

1. Reverse the trial court's grant of summary judgment;
2. Remand for trial on the merits;
3. Dismiss the action for lack of standing by Respondent;
4. Grant such other relief as the Court deems just and proper.

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FORM 7

PROOF OF SERVICE OF APPELLANTS' BRIEF

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

Appeal from Richland County

Court of Common Pleas

Hon. Milton G. Kimpson, Circuit Court Judge

Case No.: 2024-CP-40-03931

Appellate Case No.: 2025-000397

Professional Financial Services, Respondent,

v.

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

Greene, Appellants.

PROOF OF SERVICE

I certify that I have served a true and correct copy of the Appellants' Brief on the Respondent by depositing the same in the U.S. Mail, properly addressed and with proper postage affixed, on this 6th day of June, 2025. Served to:

John S. Kay, Esq.

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Respectfully submitted,

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Date: June 06, 2025