

STATE OF SOUTH CAROLINA )  
 COUNTY OF Georgetown )  
W.C. Jennings, Co Inc. )  
 Plaintiff, )  
 vs. )  
Joseph + Renee Failla )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
 JUDICIAL CIRCUIT  
 CASE NO.: 2023-CP-22-00531

MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET

**RECEIVED**  
**Aug 05 2025**

SC Court of Appeals

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)	
<b>SECTION I: Hearing Information</b>	
Nature of Motion: _____ Estimated Time Needed: _____ Court Reporter Needed: <input type="checkbox"/> YES / <input type="checkbox"/> NO	
<b>SECTION II: Motion/Order Type</b>	
<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.	
Signature of Attorney for <input type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant _____	Date submitted _____
<b>SECTION III: Motion Fee</b>	
<input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason) <ul style="list-style-type: none"> <li><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</li> <li><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</li> <li><input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party</li> <li><input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief</li> <li><input type="checkbox"/> Motion for Stay in Bankruptcy</li> <li><input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC)</li> <li><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</li> </ul> Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	
<b>JUDGE'S SECTION</b>	<b>JUDGE CODE</b> _____
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	Date: _____, 20
<b>CLERK'S VERIFICATION</b>	
Collected by: <u>Chinder</u>	Date Filed: <u>Aug 1</u> , 20 <u>25</u>
<input checked="" type="checkbox"/> MOTION FEE COLLECTED: \$ <u>85-</u> <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____	

2025 AUG - 1 AM 9:07  
 CLERK OF COURT  
 GEORGETOWN COUNTY, S.C.  
 PLAD

STATE OF SOUTH CAROLINA )  
COUNTY OF GEORGETOWN )  
W.C.Jennings Company Inc.

IN THE COURT OF COMMON PLEAS  
FOR THE FIFTEENTH JUDICIAL COURT  
Case No.2023-CP-22-00531

Plaintiff,

Vs.

**CONTEST A NOTICE OF MOTION**

Joseph Failla, Renee Failla, &  
Anderson Brothers Bank.

**NOTICE OF MOTION AND MOTION TO  
AMEND THE ORDER PURSUANT TO RULE  
60 (a) SCRPC**

=====

Anderson Brothers Bank

Counterclaim/Cross Claim

Plaintiff,

W.C.Jennings Company Inc.,

Counterclaim Defendant,

Joseph Failla and Renee Failla aka

Renee F.Failla

Cross -claim Defendants.

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Comes now the response to contest the filed Notice of Motion and Motion to Amend the Order by Defendants Joseph and Renee Failla and respectfully moves to the Court:

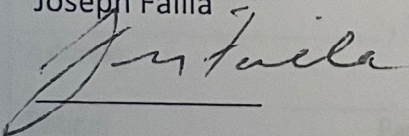
Plaintiff, W.C. Jennings Company ,Inc. by and through undersigned counsel Robert W.Maring pursuant to Rule 60(a) of the South Carolina Rules of Civil Procedures, for an order correcting a clerical mistake (scriveners error) in the Final Order filed on April 15,2025.

In written response to contest the notice of motion to amend order would be unwarranted or would be detrimental to the case filed in the court of appeal and would introduce new issues or cause undue hardship, highlighting and potential prejudice the amendment might cause.

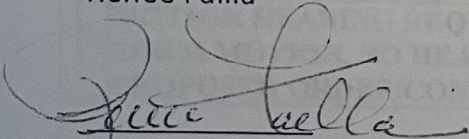
FILED  
GEORGETOWN COUNTY, S.C.  
2025 AUG - 1 AM 9:07  
CLERK OF COURT

With the case filed with the State of South Carolina Court of Appeal : Appellate case no. 2025-000850 we will present evidence or arguments that contradict the claims made in the motion this will include documents , affidavits or any other relevant materials to show the court of appeal that The Fourteenth Amendment to the U.S. Constitution guarantees due process ,which includes the right to notice and an opportunity to be heard in legal proceedings. Not being notified of a hearing prevents you from presenting your case and defending your interests, thus violating this right.

Joseph Failla



Renee Failla



212 A Machrie loop drive  
Myrtle Beach , South Carolina 29585

Copy's mailed to:

- < Robert W. Maring }  
Plaintiff Attorney
- < MASTER-IN-Equity }  
Judge Joe M. Crosby
- < State of South Carolina }  
Court of Appeal