

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

Appeal from Pickens County
In the Court of Common Pleas
The Honorable G.D. Morgan, Jr.

Appellate Case No. 2024-000870

Click Properties, LLC and Hyper Formance, LLC.....Respondents-Appellants,

Versus

Thomas SC Properties, LLC and
All-Tech Tire and Auto Repair, LLC.....Appellants-Respondents.

RECORD ON APPEAL
VOLUME IV

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1 balls are in motion. Yesterday's gonna be investigated
2 and I was like -- I was cheery.

3 You also said that I was filming. I wasn't filming.
4 That was my doorbell camera. It filmed because of the
5 doorbell ring.

6 The camera on the side is my other doorbell camera by
7 my side door because that's where UPS and those guys leave
8 packages underneath the overhang. So that way it's behind
9 my gate and All-Tech can't steal my packages.

10 But -- so, I answered the door. Deputies are
11 unclicking a gun and charging at me and they said you're
12 coming with us and I was like the hell I am and I slammed
13 the door. I emptied my pistol in my pocket. I put my
14 assault rifle down. I made sure I didn't have any weapons
15 on me and I went and met them at the side door. I had my
16 hands up.

17 I had -- if they had seen what I had behind that
18 door, they would of shot me and I was not---

19 Q. Did you---

20 A. ---you know, prepared for that. I was watching the
21 security camera footage. So, I didn't see them pull up.

22 Q. On June 30th, 2024, did you intentionally trespass
23 on All-Tech's parking lot?

24 A. I had no where else to go. I could not get my bike
25 up. It was a necessity. Also I was invited over by J.T.

Brent Click - Cross-examination
By Mr. Alexander

1 Q. why -- when you came down a hill, why didn't you just
2 keep going rather than stopping?

3 A. Because Chester was charging at me.

4 Q. The video shows you come down the hill and you stop.
5 That's what the video shows.

6 A. well, I, I---

7 Q. You stopped.

8 A. If you, if you watch more footage of me coming up and
9 down my hill, cause you have cameras pointed at there so
10 you can watch anytime you want, I come down on my dirt
11 bikes and I will go around the gate. And that -- you kind
12 of go around the gate at kind of like a slow walking pace.

13 So, that was what the stop was.

14 Q. Just a few more questions, Mr. Click.

15 I'm about through, judge.

16 These pins you're talking about, did you take
17 pictures of the pins where you originally placed them?

18 A. Yes, sir, going back to 2020. You know, it's in
19 there in the original trial. They're in the -- they're in
20 everything.

21 Q. Since September 21, 2022, which is the day of Judge
22 Gravely's final order --

23 A. Uh-huh. (Affirmative).

24 Q. -- have you -- did you have a pin out there?

25 A. It -- we've been using the same pin and we have --

Brent Click - Cross-examination
By Mr. Alexander

1 we've taken photos of it every time we file something
2 about it. I don't think we took a photo of it or I don't
3 think we filed a photo of it this time. But --.

4 Q. After two -- September 21, 2022, was that pin still
5 there?

6 A. Oh, yes, sir, it's still the same pin.

7 Q. Did you have a picture of it at the time?

8 A. Yes, sir.

9 Q. Do you have a picture of it where it's at now?

10 A. Yes, sir.

11 Q. Why didn't you produce it for the judge to look at to
12 see if anything had moved?

13 where are the pictures, Mr. Click?

14 A. Well, it's, it's just a pin in grass. The important
15 thing is the measurements.

16 Q. Yes, sir.

17 why didn't you -- why didn't you put a measuring tape
18 out there, take a picture of it, and bring it in here and
19 show it to us, put it in the record?

20 why didn't you do that?

21 A. I -- I'm a machinist. My entire career is based on
22 measurements.

23 Q. Sir, you're claiming the ground is shifting and you
24 (sic) claiming you put a pin in the ground to measure it.

25 why didn't you take pictures and bring them in here

Brent Click - Cross-examination
By Mr. Alexander

1 so we could see if, in fact, you're telling us the truth
2 that the ground is shifting?

3 why didn't you do that?

4 A. Uh.

5 Q. Do you even have pictures, Mr. Click?

6 A. Yes, sir, I do.

7 Q. Did you---

8 A. I, I, I, I believe---

9 Q. Did you bring---

10 A. I believe in one of the previous things, this -- we
11 did, or in the original trial, we did have photos of how
12 we measured it and we followed those same measurement
13 procedures every time.

14 Q. Then why -- then -- since this -- we're not
15 talking -- y'all've tried -- the trial's, as Mr. Martin
16 said, y'all've got the trial over with. Talking about
17 now.

18 A. Well, the --.

19 Q. You didn't send any pictures, did you, Mr.---

20 A. This is what that pin is from. We, we didn't expect
21 to still be making measurements of this four years later.

22 Q. Isn't it true that there's been no erosion on that
23 embankment in years?

24 Isn't that true?

25 A. Ah, there, there is erosion. But there's not as much

Brent Click - Cross-examination
By Mr. Alexander

1 as there would of been if I---

2 Q. where are the pictures---

3 A. ---and, and---

4 Q. ---of the erosion?

5 A. ---controlled the water and sacrificed my driveway
6 for it to run the water down the middle of the driveway
7 instead of over the side. If I had ran it over the other
8 side, you wouldn't even -- have a lot more erosion and
9 we'd have a lot more building damage.

10 But I've been doing---

11 Q. Mr.---

12 A. ---everything I can to mitigate the damages and it --
13 keep the water from going over the side. The steel beams
14 are part of that. The dirt's rolled up against it.

15 They are actually heavy and, you know, a couple
16 thousand pounds total. But what they do is they apply
17 pressure and they apply -- they provided support. It's
18 kind of like if you're pushing over a stack of blocks that
19 has one big long block on top versus pushing over just
20 a -- individually stacked blocks.

21 Q. where are the pictures of the ero -- of the erosion
22 on the embankment as a result of the original excavation
23 of the embankment?

24 where---

25 A. In---

Brent Click - Cross-examination
By Mr. Alexander

1 Q. Where are they?

2 A. They are in Hall's photos. I'm not allowed down on
3 All-Tech's property.

4 Q. You don't -- in other words, you don't have any
5 pictures of any erosion, erosion on the embankment, do
6 you, Mr. Click?

7 A. We do. There's also measurements. There's all the
8 testimony of the engineers.

9 Q. And isn't it the fact that the bank is not eroding?
10 Isn't that true?

11 A. Well, I have, I have photos of, of Chester and other
12 employees of All-Tech shoveling the silt out that, that
13 comes off of the hill that flows into their building and
14 they have to shovel out.

15 Q. You didn't produce them today, did you, Mr. Click?
16 Did you?

17 A. Would you like them?

18 Q. Sir, this is, this is your case you're trying.
19 You've got to present the evidence.

20 You didn't produce them, did you?

21 A. I can give them to you.

22 Q. Did you produce them for this hearing today,
23 Mr. Click?

24 A. I can produce them.

25 Q. Would you answer my question?

Brent Click - Cross-examination
By Mr. Alexander

1 Did you produce them for this hearing today?

2 A. I did not but I can. You, you, you --.

3 MR. ALEXANDER: Judge, thank you very much. That's
4 all the questions I've got.

5 THE COURT: All right. Redirect. Please be very
6 brief.

7 MR. MARTIN: I have nothing, Your Honor.

8 THE COURT: All right.

9 MR. ALEXANDER: Judge, I would like to have the
10 opportunity to submit an updated supplemental attorney's
11 fees affidavit if the Court would allow that.

12 THE COURT: I'll allow both parties to submit.

13 All right. I will take it under advisement. I will
14 have everything that's been submitted to you. I've heard
15 the evidence. So, I will take it under advisement and let
16 you know my decision.

17 MR. ALEXANDER: Judge, can I just bring one more
18 thing up if you don't mind?

19 I asked the Court to do a site visit and I would urge
20 the Court to take a look at it yourself if you feel it's
21 necessary.

22 THE COURT: All right. I'll note your request.

23 All right. Anything else?

24 MR. ALEXANDER: No, sir.

25 MR. MARTIN: Your Honor, I -- you do -- you did allow

1 me to submit some new evidence and I'm gonna do that
2 before you make your decision and thank you---

3 THE COURT: Just that---

4 MR. MARTIN: ---very much.

5 THE COURT: Just that, just that one piece.

6 MR. MARTIN: Right.

7 THE COURT: whatever that --.

8 MR. MARTIN: Right.

9 THE COURT: All right. That will conclude our
10 hearing.

11 Thank you.

12 MR. MARTIN: Thank you, Your Honor.

13 MR. ALEXANDER: Thank you, judge.

14

15 * * *END OF REQUESTED TRANSCRIPT OF RECORD* * *

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C E R T I F I C A T E

I, Pamela E. Green, Official Court Reporter for the State of South Carolina, do hereby certify that the foregoing is a true, accurate and complete Transcript of Record of the proceedings had and evidence introduced in the trial of the captioned case, relative to appeal, in the Court of Common Pleas Nonjury for Pickens County, South Carolina, on the 9th day of August, 2024.

I do further certify that I am neither of kin, counsel nor interest to any party hereto.

January 28th, 2025

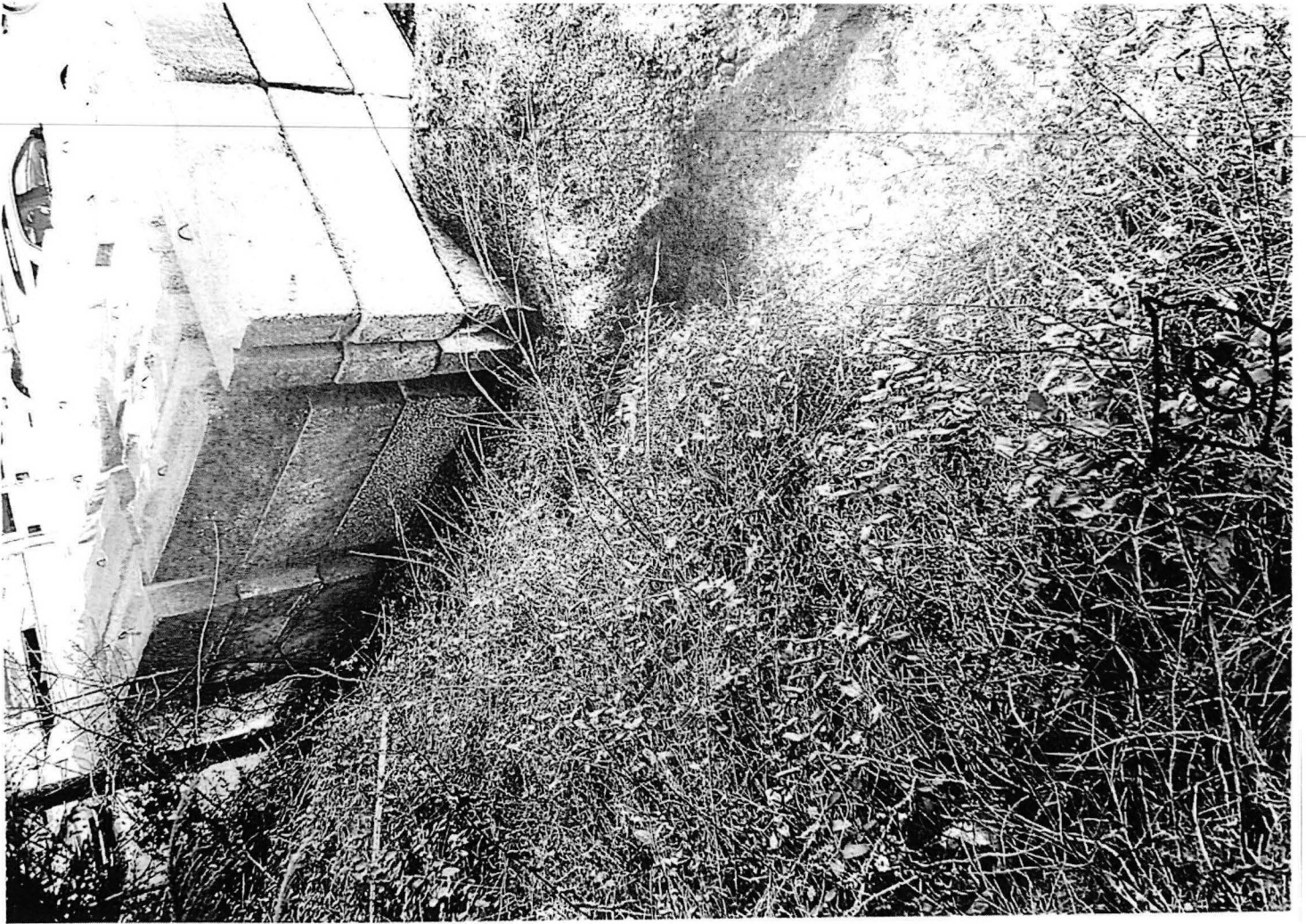
PAMELA E. GREEN, Court Reporter



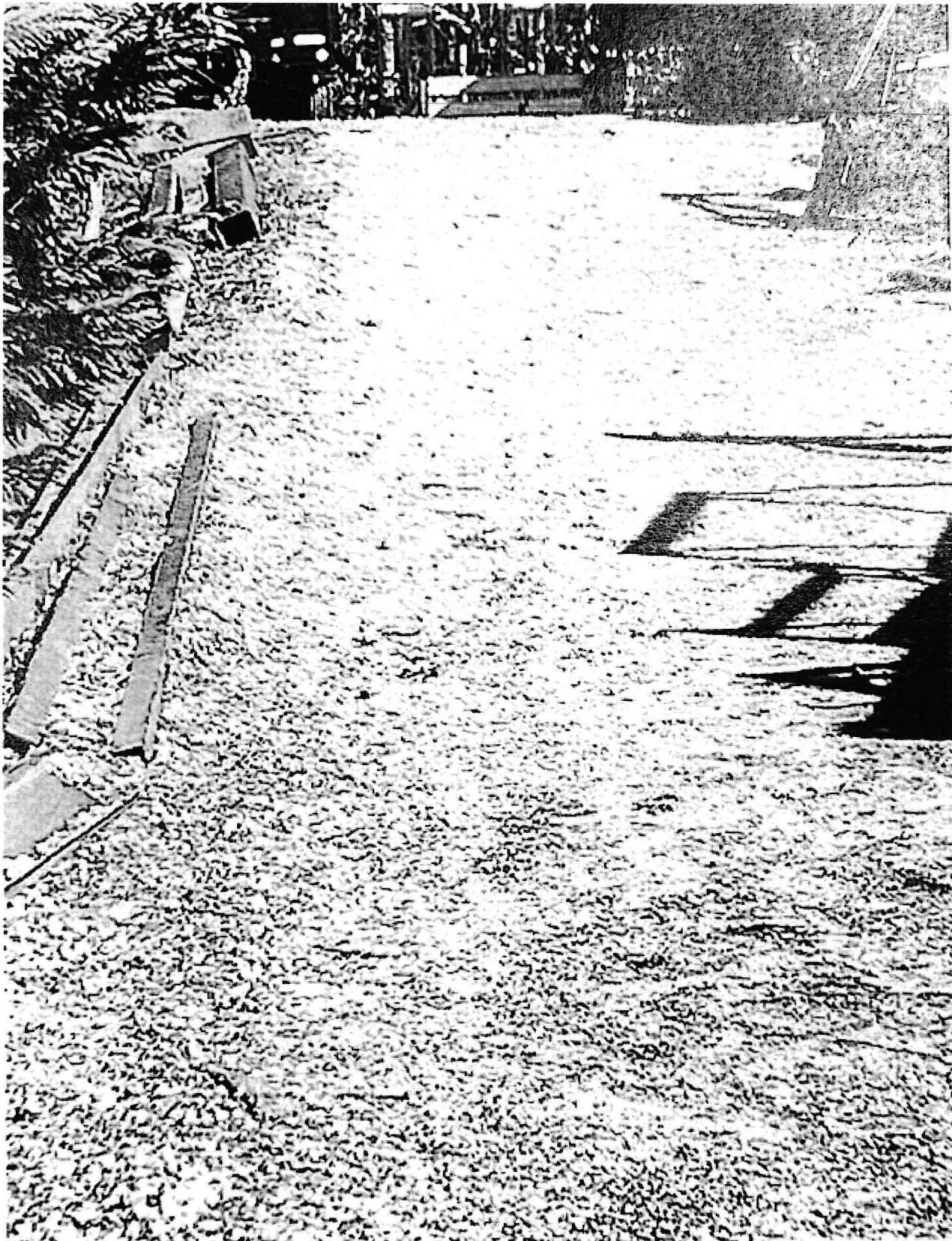
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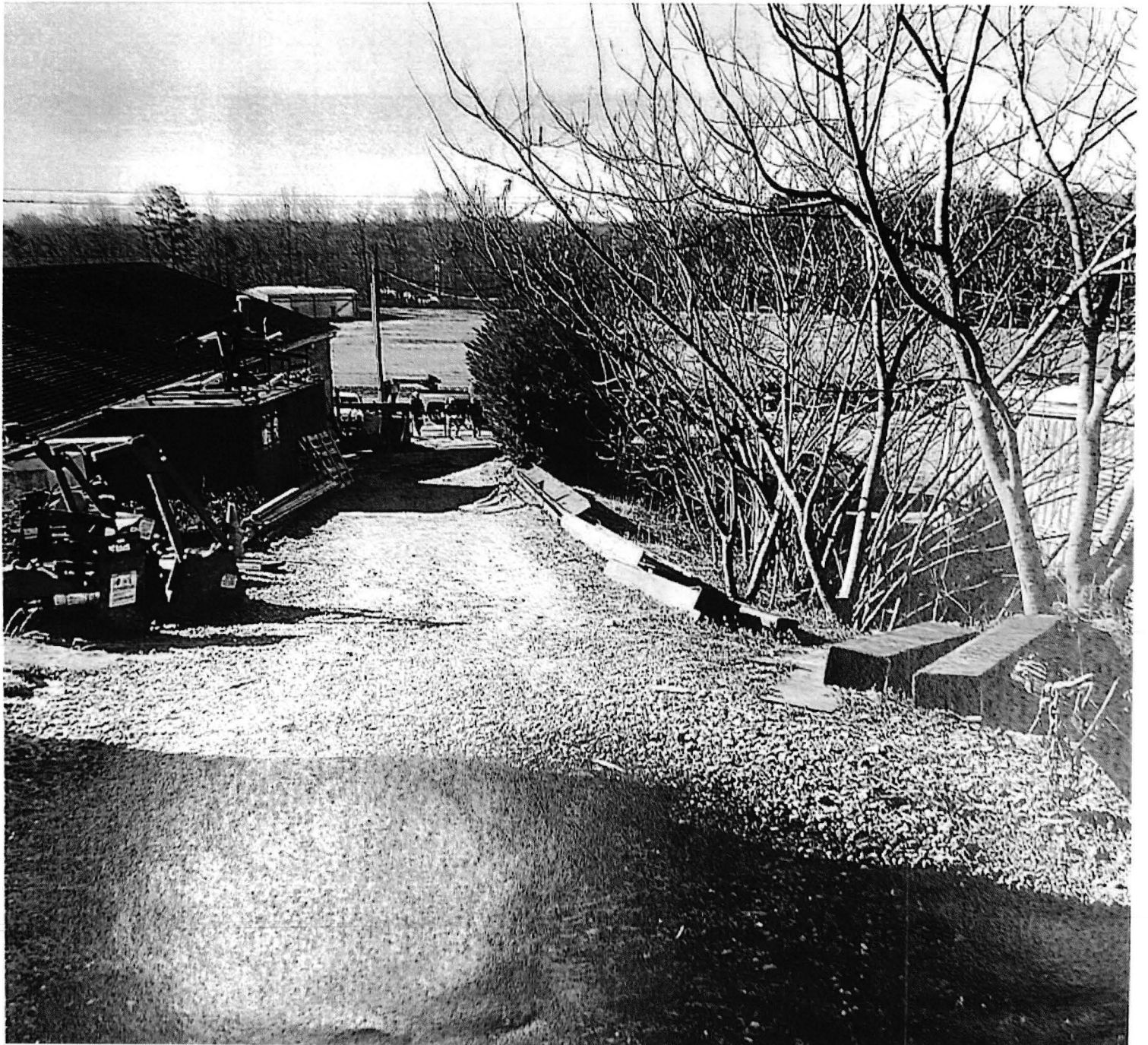
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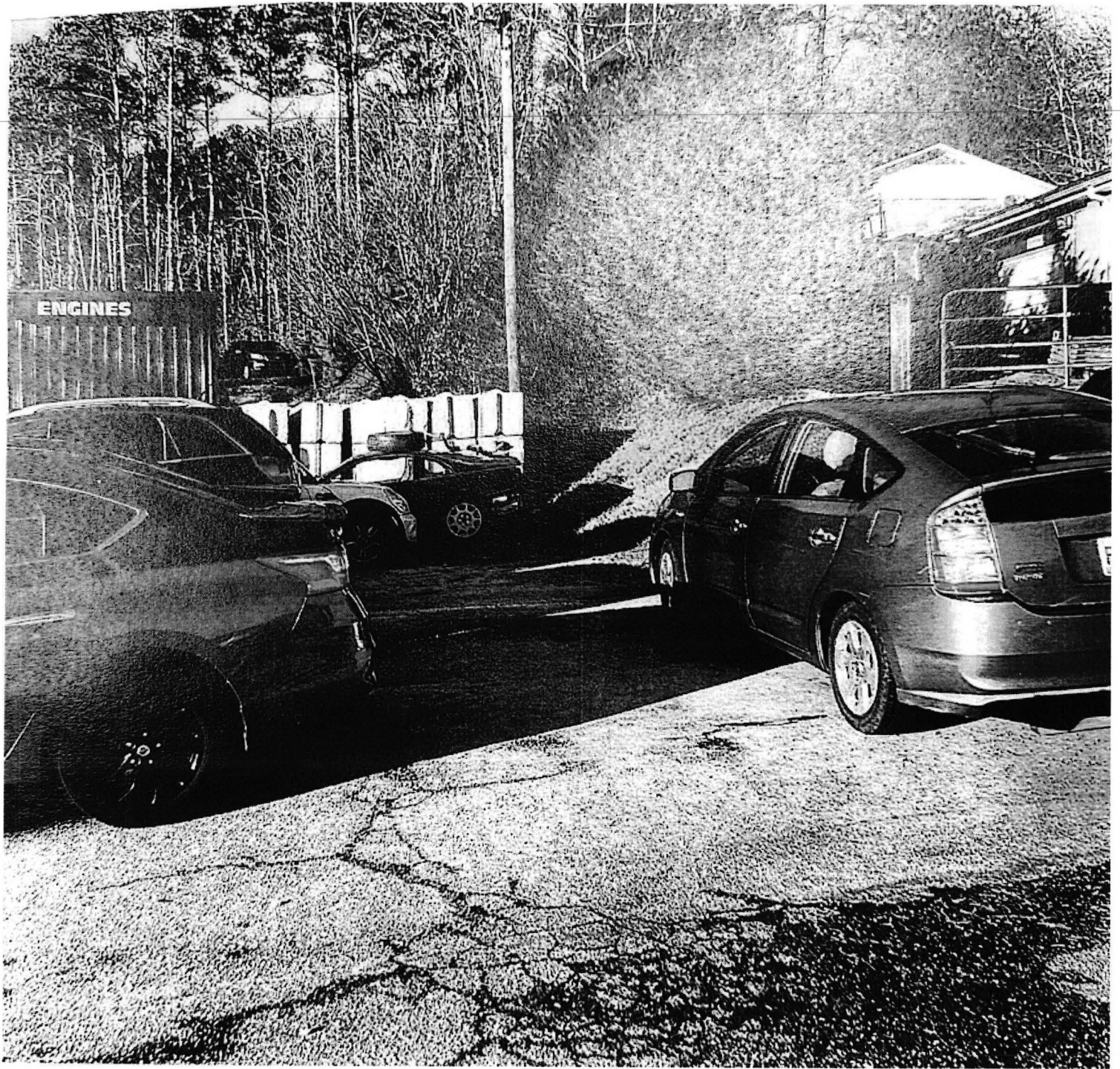


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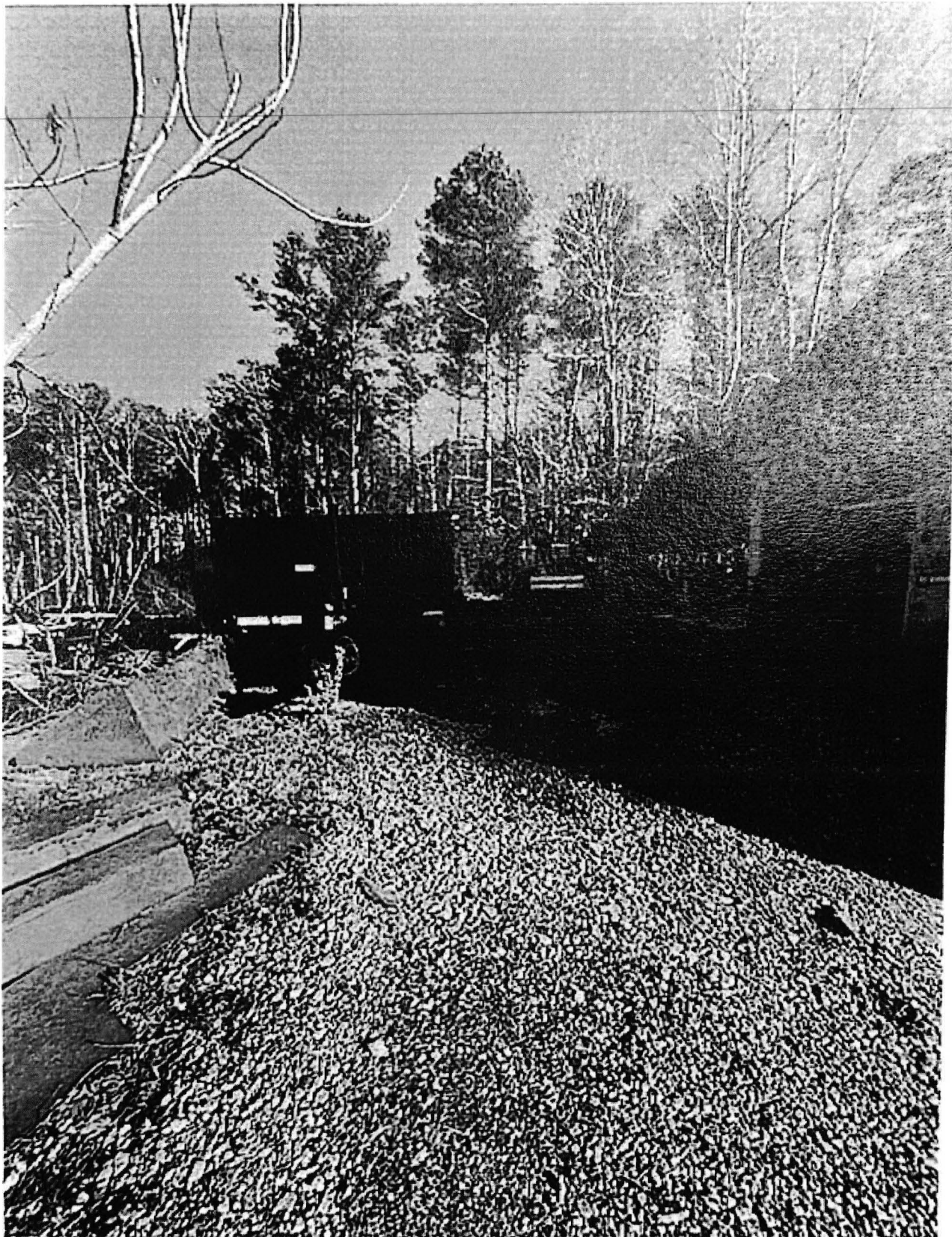
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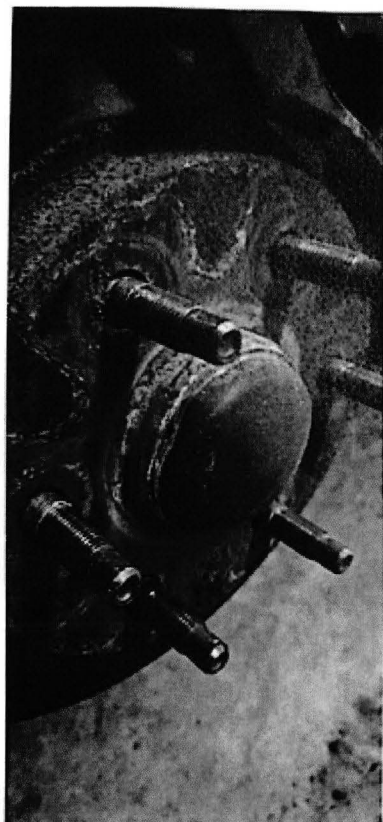


Photo 8

PLAINTIFF'S
EXHIBIT
C
3-5-23

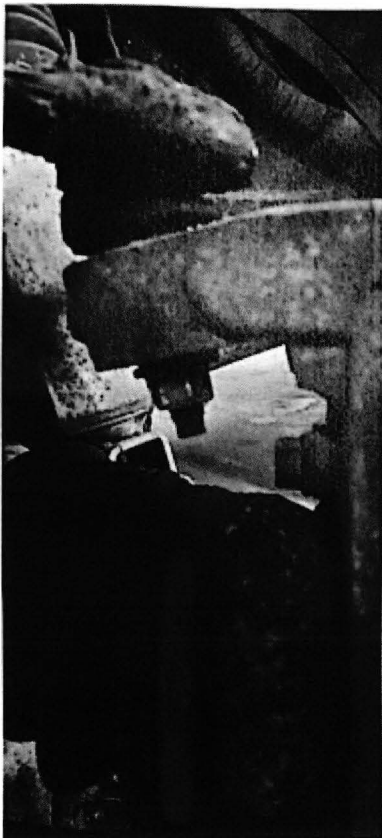
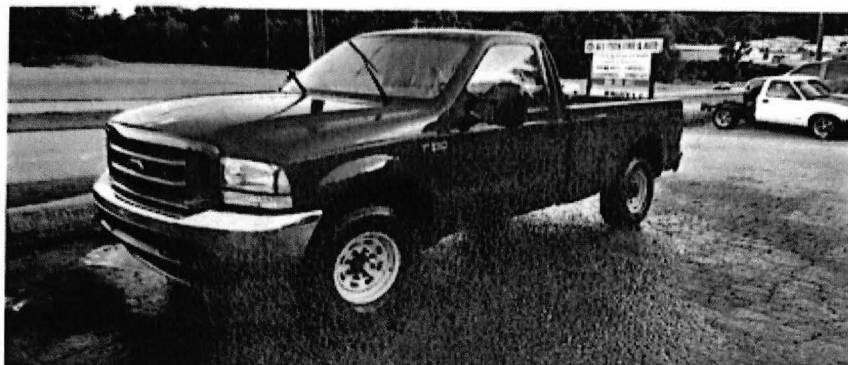


Photo 6

PLAINTIFF'S
EXHIBIT
A
3-3-23
PENDING 800-831-6000

EXHIBIT N



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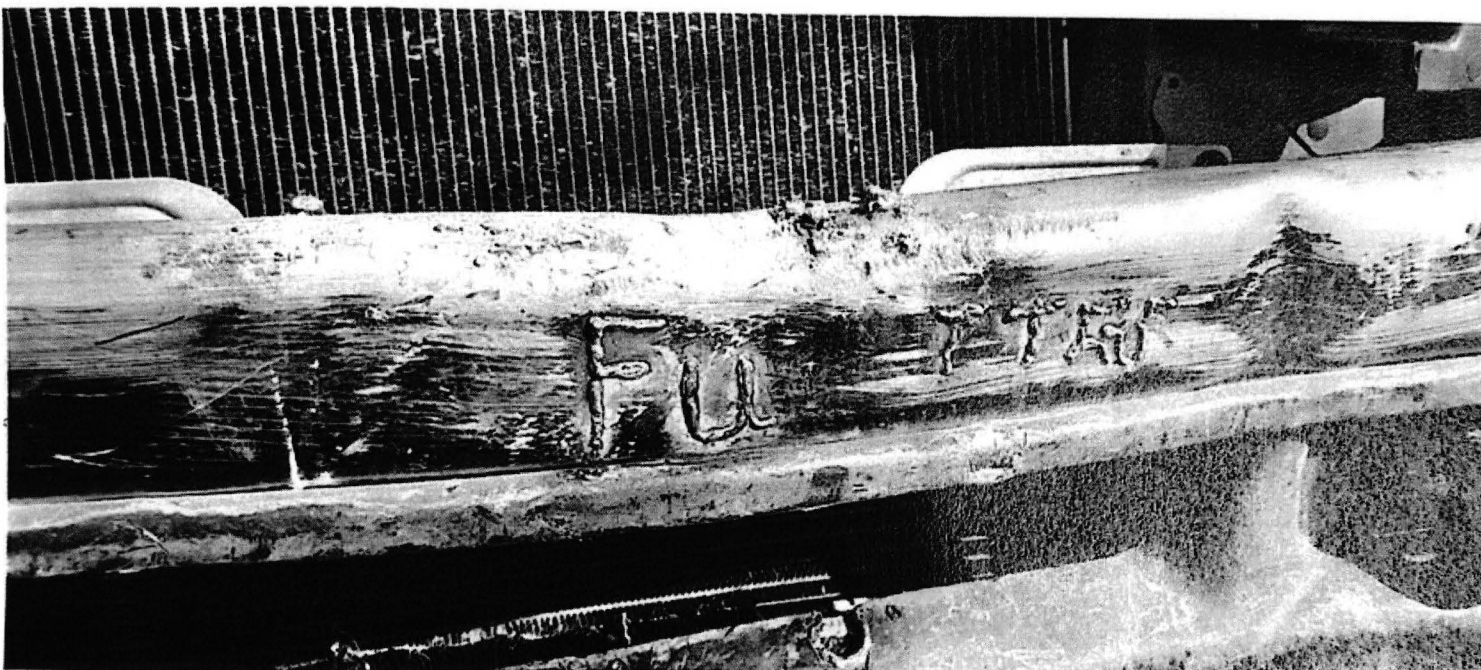




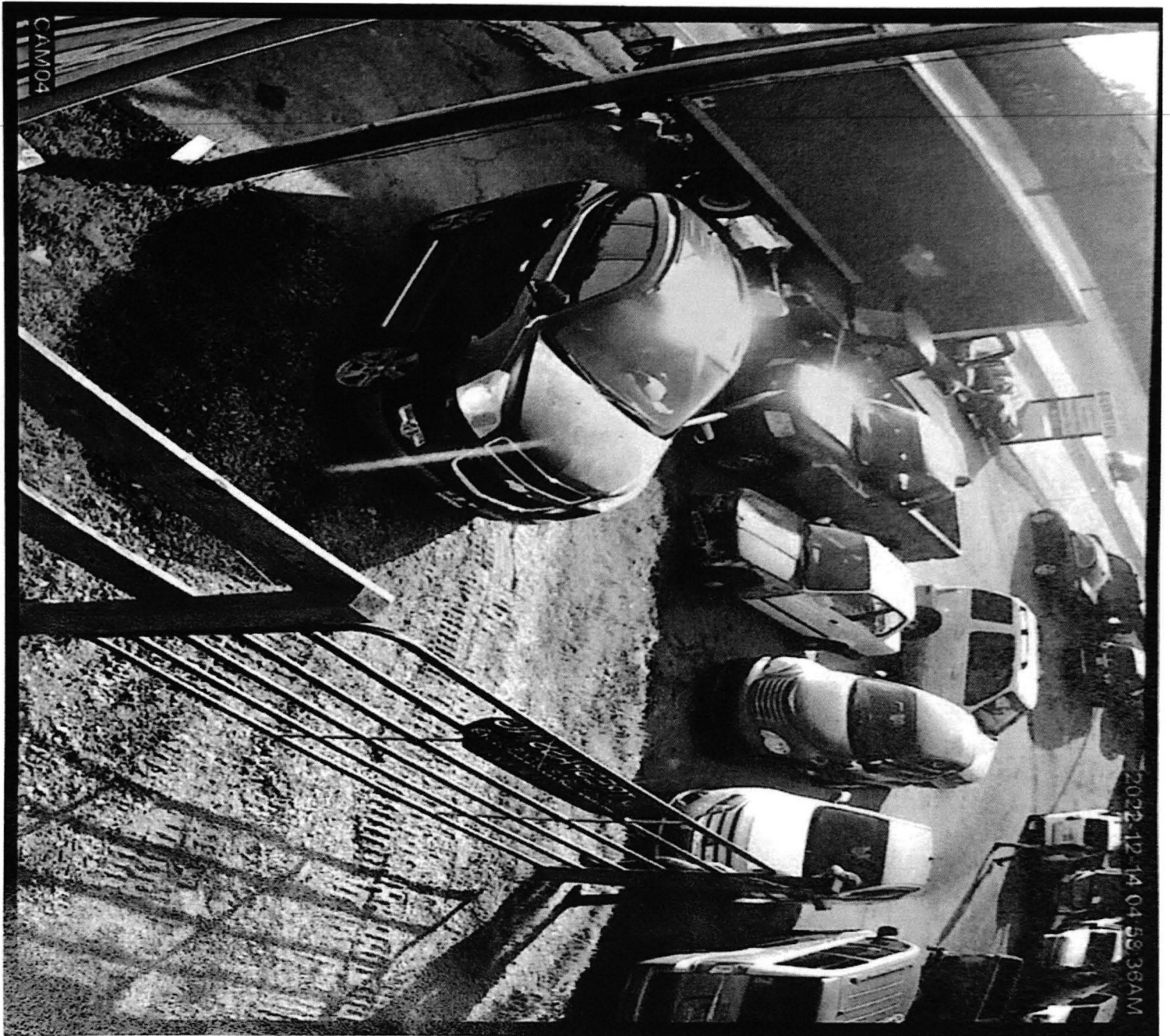
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PLAINTIFF'S
EXHIBIT *9cc*
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3-3-23

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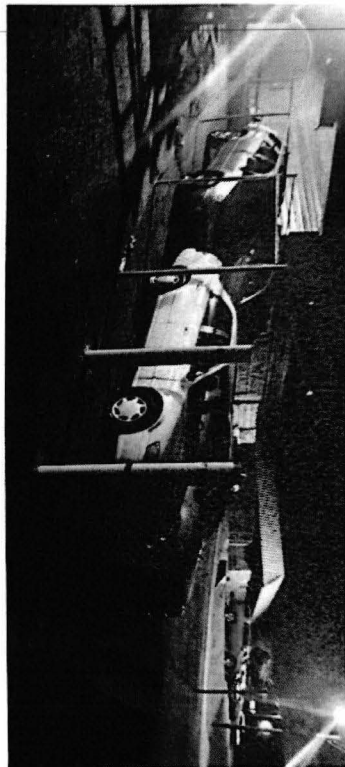


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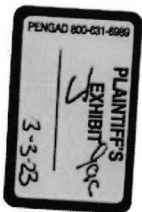
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EXHIBIT J



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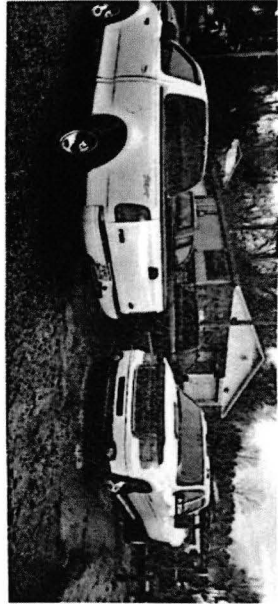
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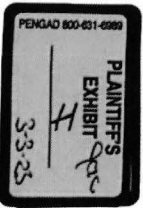


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EXHIBIT 1



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STATE OF SOUTH CAROLINA)
COUNTY OF PICKENS)

IN THE COURT OF COMMON PLEAS
THIRTEENTH JUDICIAL CIRCUIT

Click Properties, LLC)
And Hyper Formance, LLC,)

CASE #: 2020-CP-39-00266

Plaintiffs,)

vs.)

Thomas SC Properties, LLC)
And All-Tech Tire and)
Auto Repair)

RECORDS OF DAVID HALL
RECEIVED BY SUBPOENA
SUBMITTED BY DEFENDANTS

Defendants.)

.)

jfellenburg@thealexanderlawfirm.com

From: DHall@h2l.com
Sent: Tuesday, July 30, 2024 1:57 PM
To: jfellenburg@thealexanderlawfirm.com; Brad Martin
Subject: Re: Subpoena
Attachments: David Hall new property line.pdf; Field Shots Click Property.pdf; Revised Hood Drawing with smaller blocks.pdf; Updated Exhibit.pdf

Jennifer:

Attached is the information in my files generated since September 2022. A couple of these had to be printed from an AutoCad file. I never received the subpoena except from your email.

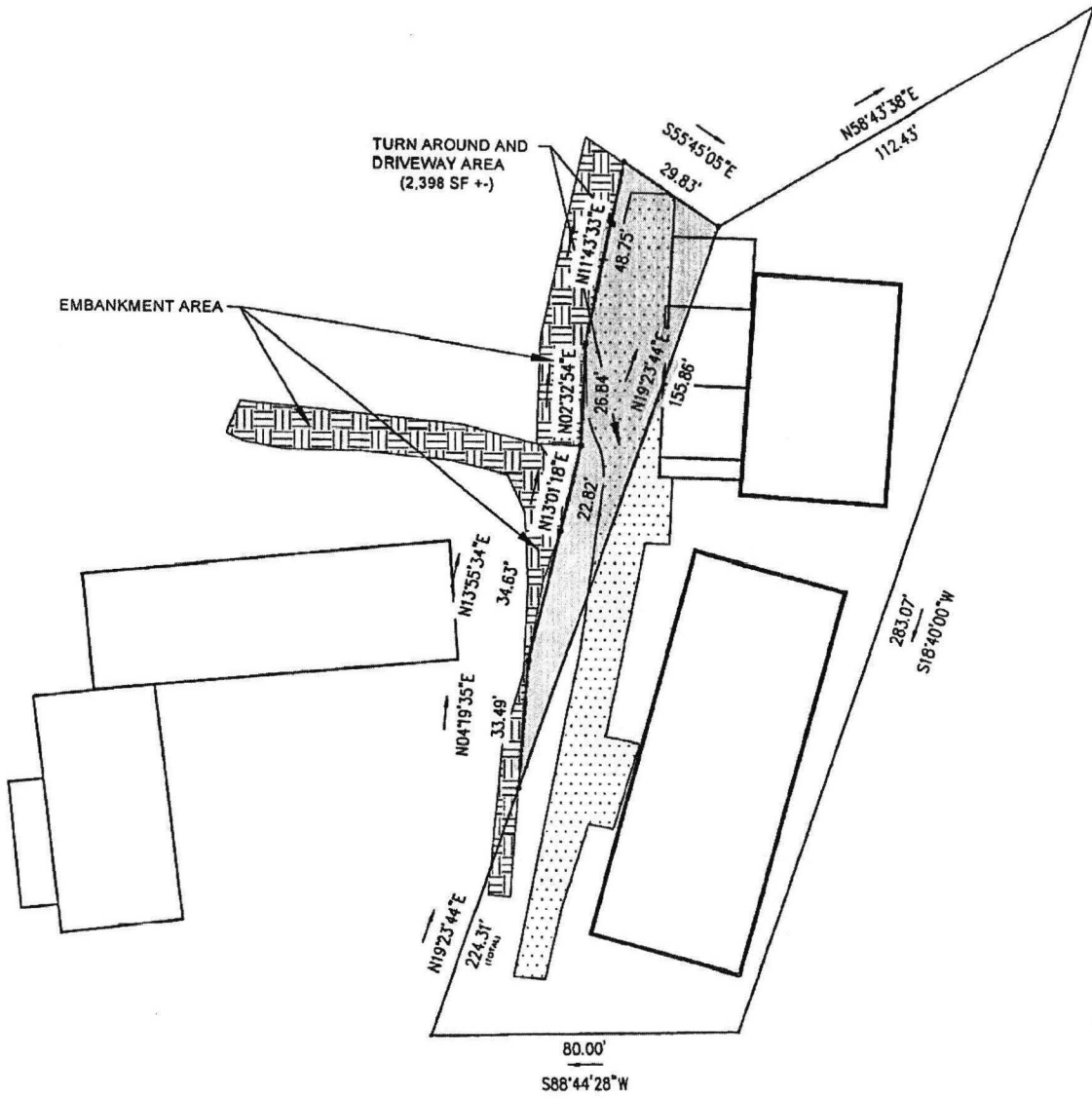
David Hall

From: <jfellenburg@thealexanderlawfirm.com>
To: <dhall@h2l.com>
Date: 07/25/2024 10:00 AM
Subject: Subpoena

Attached is the subpoena that I just spoke with you about. Thank you for your assistance.

Jennifer F. Ellenburg
Alexander Law Firm
P.O. Box 618
Pickens, SC 29671
864-898-3208 (phone)
864-898-3408 (fax)
[attachment "hall subpoena-07252024095828.pdf" deleted by David Hall/h2l]

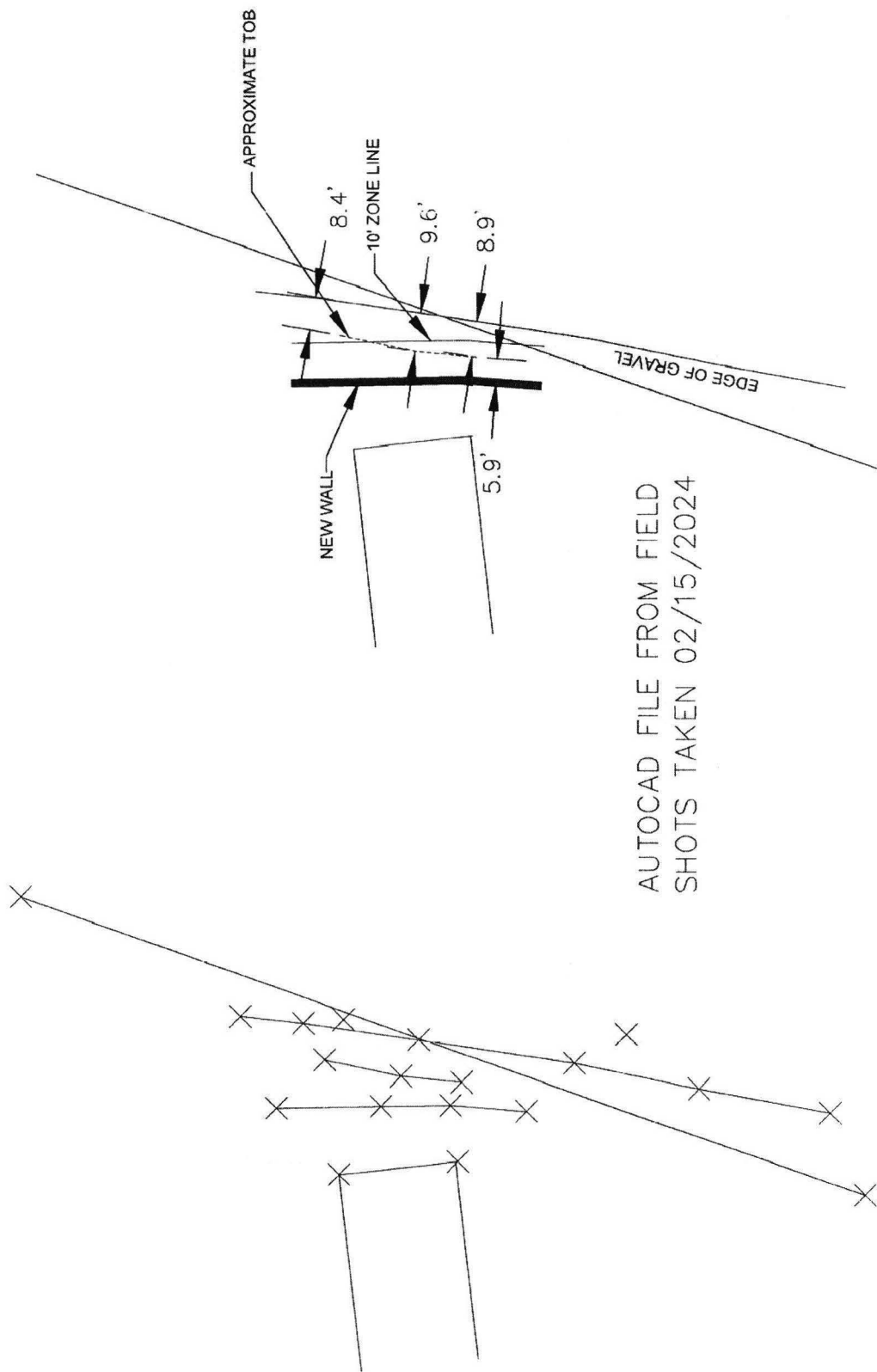
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[CLICK PROPERTY EXHIBIT](#)

PREPARED BY: DAVID HALL, PE
06/01/2022 (REVISED 06/02/2022)
SCALE 1" = 20'

01533



AUTOCAD FILE FROM FIELD
SHOTS TAKEN 02/15/2024

01534

3670 Calhoun Mem Hwy, Easley, SC 29611

CONSTRUCTION NOTES:

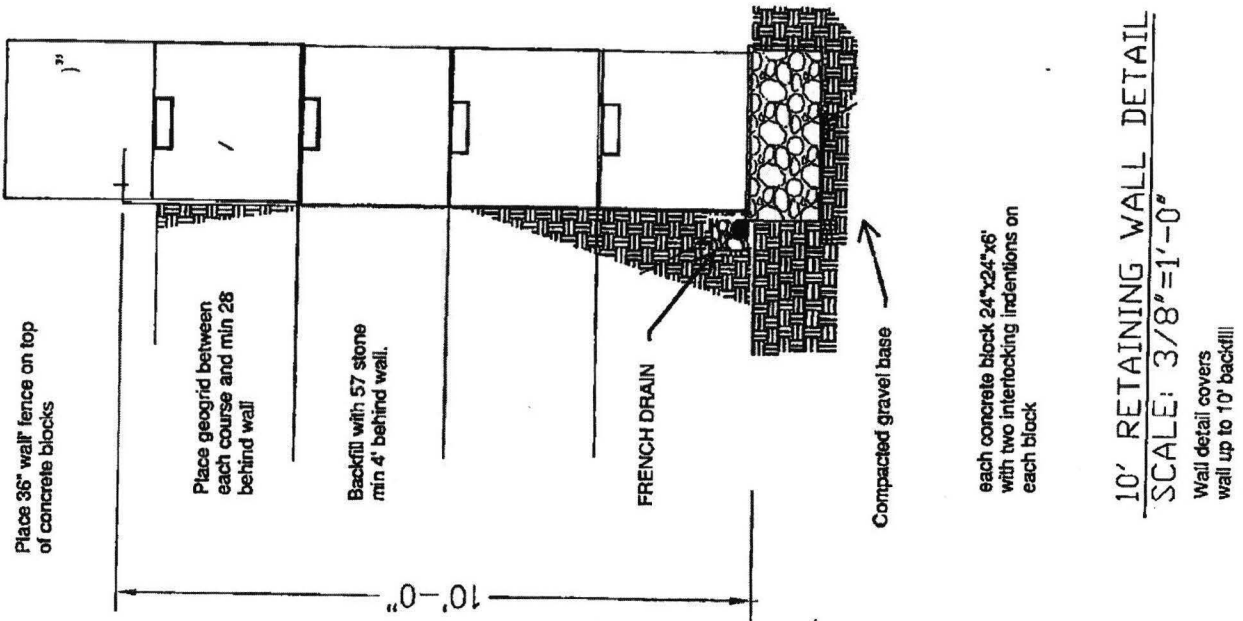
WALLS ARE DESIGNED FOR 2,000 PSF BEARING CAPACITY. ALL FOOTINGS SHALL BEAR ON ORIGINAL, UNDISTURBED SOIL, IF POSSIBLE. ALL STRUCTURAL FILL SHALL BE TESTED BY A GEOTECHNICAL ENGINEER AND MUST REACH 95% COMPACTION FOR EACH LIFT.

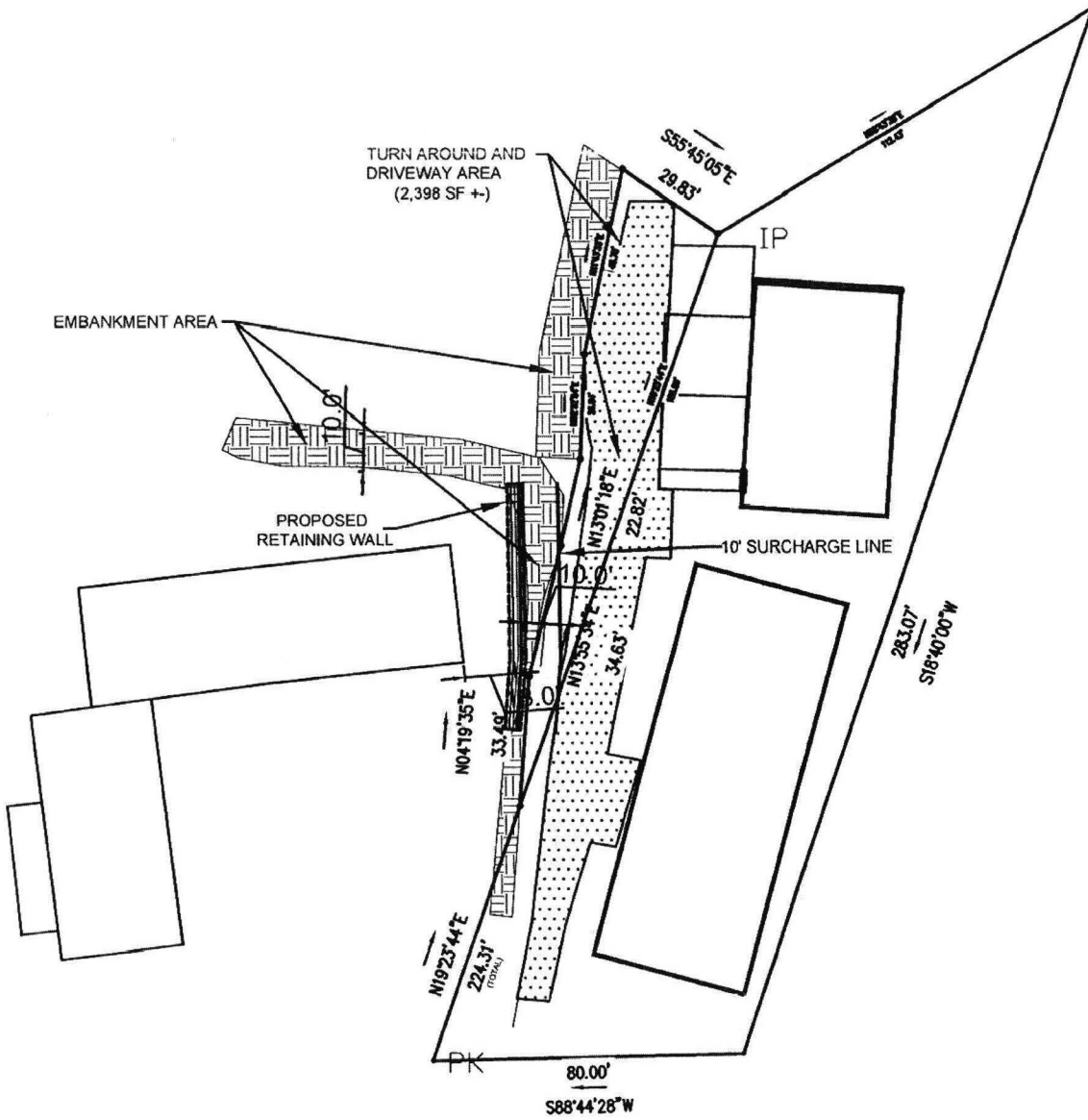
ALL CONCRETE TO BE 3,000 PSI NW.

PROVIDE POSITIVE DRAINAGE AWAY FROM THE RETAINING WALL DURING CONSTRUCTION AND PERMANENTLY.

DO NOT OPERATE ANY HEAVY EQUIPMENT NEAR THE RETAINING WALL.

NO SURCHARGE LOAD OR UPSLOPE INCLINE OF BACKFILL WITHIN 10 FEET OF WALL.





[CLICK PROPERTY EXHIBIT](#)

PREPARED BY: DAVID HALL, PE
06/01/2022 (REVISED 02/12/2024)
UPDATED WITH SURVEY INFO 02/15/2024
SCALE - N.T.S.

ALEXANDER LAW FIRM, LLC

107 E. Main Street
Post Office Box 618
Pickens, SC 29671

James C. Alexander
Steven L. Alexander

(864) 898-3208 T
(864) 898-3408 F

July 18, 2024

Mr. David Hall
Hall Engineering, Inc.
11 Toy Street, #A
Greenville, SC 29601

325 772 2222

Re: Click Properties, LLC and Hyper Formance, LLC vs.
Thomas SC Properties, LLC and All-Tech Tire and
Auto Repair, LLC

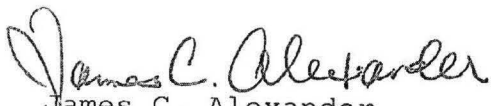
Dear Mr. Hall:

I have enclosed a subpoena for a copy of all of your records and reports generated regarding the above case from September 21, 2022 the present date. Please provide a copy of these documents to my office on or before July 29, 2024 as noted in the subpoena.

If you have any questions, do not hesitate to contact me.

Sincerely,

ALEXANDER LAW FIRM, LLC


James C. Alexander

JCA;jfe

enclosure

cc: Mr. Bradford N. Martin
Via email only

ELECTRONICALLY FILED - 2024 Aug 05 4:08 PM - PICKENS - COMMON PLEAS - CASE#2020CP3900266

01537

STATE OF SOUTH CAROLINA

ISSUED BY THE COMMON PLEAS COURT IN THE COUNTY OF PICKENS

CLICK PROPERTIES LLC , ET AL, Plaintiff

v.

SUBPOENA IN A CIVIL CASE

THOMAS SC PROPERTIES, ET AL, Defendant

Case Number: 2020-CP-39-00266

Pending in PICKENS County

TO: DAVID HALL, Hall Engineering, Inc., 11 Toy Street #A, Greenville, SC 29601

YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME , AM

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME , AM
---------------------	--------------------

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents of objects:

All documents and reports and notes related to engineering issues and the retaining wall issues that were raised in the above case generated by you from September 21, 2022 to the present date. This subpoena also applies to any documents generated after you receive this subpoena but before August 9, 2024.

PLACE 107 E. Main Street, Pickens, SC 29671	DATE AND TIME July 29, 2024, 10:00 AM
--	---------------------------------------

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME , AM
----------	--------------------

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

James C. Alexander

DATE 07/19/2024

ATTORNEY/ISSUING OFFICER'S SIGNATURE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

CLERK OF COURT/ISSUING OFFICER SIGNATURE

DATE

PRINT NAME

01538

ELECTRONICALLY FILED - 2024 Aug 05 4:08 PM - PICKENS - COMMON PLEAS - CASE#2020CP3900266

PROOF OF SERVICE

SERVED	DATE	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
	PLACE	
SERVED ON		MANNER OF SERVICE
SERVED BY		TITLE

DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

- i. fails to allow reasonable time for compliance; or
- ii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or
- iii. requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or
- iv. subjects a person to undue burden.

(B) If a subpoena:

- i. requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- ii. requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- iii. requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

STATE OF SOUTH CAROLINA)
)
 COUNTY OF PICKENS) IN THE COURT OF COMMON PLEAS
) THIRTEENTH JUDICIAL CIRCUIT

Click Properties, LLC)
 And Hyper Formance, LLC,)
)
 Plaintiffs,) CASE #: 2020-CP-39-00266
)
 vs.)
) RECORD CUSTODIAN AFFIDAVIT
 Thomas SC Properties, LLC)
 And All-Tech Tire and)
 Auto Repair)
)
 Defendants.)
)

Deponent being first duly sworn states:

1. I am the Records Custodian for Hall Engineering, Inc.
2. As Records Custodian, I received a subpoena from The Alexander Law Firm, LLC requesting a copy of the attached records and reports in possession or control of Hall Engineering, Inc.
3. As the Records Custodian for Hall Engineering, Inc., the attached documents as a true, accurate and complete copy of records in the possession of Hall Engineering, Inc. and are responsive to the subpoena issued by The Alexander Law Firm, LLC.

Signature of Record Custodian

Printed name of Record Custodian

SWORN TO AND SUBSCRIBED BEFORE ME
 ___ day of July, 2024

Notary Public of South Carolina
 My Commission expires _____

STATE OF SOUTH CAROLINA)
)
COUNTY OF PICKENS)

Click Properties, LLC)
And Hyper Formance, LLC,)
)
Plaintiffs,)
)
vs.)
)
Thomas SC Properties, LLC)
And All-Tech Tire and)
Auto Repair)
)
Defendants.)
)

IN THE COURT OF COMMON PLEAS
THIRTEENTH JUDICIAL CIRCUIT

CASE #: 2020-CP-39-00266

SUPPLEMENTAL
PICKENS COUNTY SHERIFF
OFFICE RECORDS

RECEIVED BY REQUEST OF PLAINTIFFS

SUBMITTED BY DEFENDANTS

OFFICE OF THE SHERIFF Pickens County

RICK CLARK Sheriff



216 C. David Stone Road Pickens, South Carolina 29671

Office Phones 864-898-5500 864-868-2603
Fax 864-898-5531

ELECTRONICALLY FILED - 2024 Aug 07 2:21 PM - PICKENS - COMMON PLEAS - CASE#2020CP3900266

July 22, 2024

Mr. Bradford N. Martin, Esq.
Bradford, Neal, Martin & Associates, PA
Attorneys at Law
P.O. Box 10410
Greenville, SC 29603

Re: Subpoena – 2020-CP-39-00266
Click Properties, et al. v. Thomas SC Properties, et al.

Dear Mr. Martin:

We received your subpoena in a Civil Case on July 19, 2024. You have specifically requested:

“Listing of calls regarding Robert Brent Click, Hyper Formance, LLC at 3668 Calhoun Memorial Highway and/or Jonathan Thomas, All-Tech Tire and Auto Repair, 3770 Calhoun Memorial Highway from January 1, 2022 to the present. This includes any and all computer-generated listings, especially those available to any Deputies in patrol car computer systems.”

You are being provided 14 pages of un-redacted call logs in response to your subpoena.

Please do not hesitate to contact me if I can answer any questions regarding the information provided.

Yours truly,

A handwritten signature in black ink that reads 'Amanda J. Howard'. The signature is fluid and cursive, with the first name being the most prominent.

Amanda J. Howard, FOC Specialist

01542

Hyper Formance/PCSO 000001

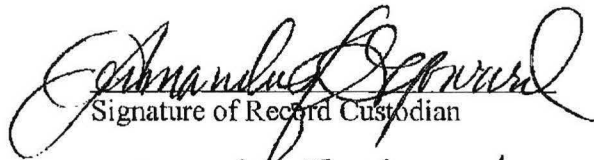
IN THE STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF PICKENS)	
Click Properties, LLC and Hyper Formance, LLC,)	C. A. No. 2020 CP-39-0266
)	
Plaintiffs,)	
)	
vs.)	AFFIDAVIT OF RECORD CUSTODIAN
)	
Thomas SC Properties, LLC and All-Tech Tire and Auto Repair, LLC,)	
)	
Defendants.)	

I, Amanda J. Howard, hereby swear under oath that I am over the age of eighteen (18) years and states as follows:

- I am the Record Custodian for Pickens County Sheriff's Office.
- As Record Custodian, I received a subpoena from the law firm of Bradford Neal Martin & Associates, requesting a complete copy of any and all items requested by subpoena in the possession and/or control of Pickens County Sheriff's Office pertaining to the above captioned case.
- As the Record Custodian for Pickens County Sheriff's Office, the attached records, consisting of

14 page(s)
 _____ disc(s)
 _____ photograph(s) and
 _____ video(s), are hereby verified as a true,

accurate and complete copy of records in the possession of Pickens County Sheriff's Office responsive to the request issued by Bradford Neal Martin & Associates.


Signature of Record Custodian

Amanda J. Howard
Printed Name of Record Custodian

Dated: July 22, 2024

SWORN to before me this 22 day of July, 2024

Notary Public for Kylie Davis
My Commission Expires: 10-08-31

01543

STATE OF SOUTH CAROLINA

ISSUED BY THE COURT OF COMMON PLEAS IN THE COUNTY OF PICKENS

Click Properties, LLC and Hyper Formance, LLC,
Plaintiffs

v.

SUBPOENA IN A CIVIL CASE

Thomas SC Properties, LLC and All-Tech Tire
and Auto Repair, LLC,
Defendants

Case Number: 2020-CP-39-00266

Pending in Pickens County

TO: Pickens County Sherrif's Office, ATTN: Records Department, 216 C David Stone Road
Pickens, South Carolina 29671

YOU ARE COMMANDED to appear in the above named court at the place, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
---------------------	---------------

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents in your possession, custody or control at the place, date and time specified below:

Listing of calls regarding Robert Brent Click, Hyper Formance, LLC at 3668 Calhoun Memorial Highway and/or Jonathan Thomas, All-Tech Tire and Auto Repair, 3770 Calhoun Memorial Highway from January 1, 2022 to the present. This includes any and all computer generated listings, especially those available to any Deputies in patrol car computer systems.

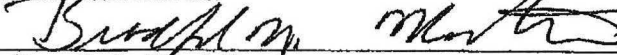
Bradford Neal Martin & Associates, PA 101 E. Washington Street, Suite 220 Greenville, SC 29601	DATE AND TIME: July 29, 2024 at 5:00 p.m.
--	--

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME , AM
----------	--------------------

ANY SUBPOENAED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULES OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS. THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

 16/24
Attorney/Issuing Officer's Signature Date Bradford N. Martin Print Name

Indicate if Attorney for Plaintiff or Defendant
Attorney's Address and Telephone Number:
Attorney for Plaintiff

Bradford Neal Martin & Associates, PA
101 E. Washington Street, Suite 220, Greenville, SC 29601

01544

Clerk of Court/Issuing Officer's Signature _____ Date _____ Print Name _____
 Pro Se Litigant's Name, Address and Telephone Number: _____

PROOF OF SERVICE

SERVED	DATE	FEES AND MILEAGE TO BE TENDERED TO WITNESS UPON DAILY ARRIVAL <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
	PLACE	
SERVED ON	MANNER OF SERVICE USPS Certified Mail	
SERVED BY	TITLE	

DECLARATION OF SERVER

I certify that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, South Carolina Rules of Civil Procedures, Parts (c) and (d):

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial. A party or an attorney responsible for the issuance and service of a subpoena for production of books, papers and documents without a deposition shall provide to another party copies of documents so produced upon written request. The party requesting copies shall pay the reasonable costs of reproduction.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises—or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time in the court that issued the subpoena for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued, or regarding a subpoena commanding appearance at a deposition, or production or inspection directed to a non-party, the court in the county where the non-party resides, is employed or regularly transacts business in person, shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance; or

(ii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to travel more than 50 miles from the county where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held; or

(iii) requires disclosure of privileged or otherwise protected matter and no exception or waiver applies; or

01545

(iv) subjects a person to undue burden.

(B) If a subpoena:

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party nor an officer, director or managing agent of a party, nor a general partner of a partnership that is a party, to incur substantial expense to travel from the county where that person resides, is employed or regularly transacts business in person, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1)(A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(6)(B). The court may specify conditions for the discovery.

(2)(A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, the receiving party must take reasonable steps to retrieve the information. The person who produced the information must preserve the information until the claim is resolved.

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PICKENS COUNTY SHERIFF'S OFFICE

216 C. DAVID STONE ROAD • PICKENS, SOUTH CAROLINA 29671

Incident Report

Communications Report / CAD

Inmate Booking Report

CFS Log

Printed on July 22, 2024

Date Range	between 1/1/2022 and 7/22/2024	Status	Any Status	Dispatch Agency	Pickens County 911 - Pickens County 911
IR	All Incidents	Call Taker	All Call Takers	Responder Agency	All Agencies
Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street		Name		Phone #	8649821996
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

06/30/24 19:09 Amber Barnard IR #s: S2024-02492

Primary Incident Code 129HP : HANDLE BY PHONE
Location 3670 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names JONATHAN DAVID THOMAS, JONATHAN THOMAS

10/02/23 08:02 Ashley Stelline

Primary Incident Code 1049 : DISTURBANCE
Location 3670 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names JONATHAN

09/18/23 10:26 Lisa Ellison

Primary Incident Code 1072 : LARCENY
Location 3670 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names THOMAS, JONATHAN

ELECTRONICALLY FILED - 2024 Aug 07 2:21 PM - PICKENS - COMMON PLEAS - CASE#2020CP3900266

01547



PICKENS COUNTY SHERIFF'S OFFICE

216 C. DAVID STONE ROAD · PICKENS, SOUTH CAROLINA 29671

Incident Report

Communications Report / CAD

Inmate Booking Report

CFS Log

Printed on July 22, 2024

Date Range	between 1/1/2022 and 7/22/2024	Status	Any Status	Dispatch Agency	Pickens County 911 - Pickens County 911
IR	All Incidents	Call Taker	All Call Takers	Responder Agency	All Agencies
Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street		Name		Phone #	843-340-3965
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

05/28/24 22:40 Lakay Blakely Ext. #: 14CRFD2400248, EMS2407206, PCEM2400564

Primary Incident Code 1070ST : STRUCTURE FIRE
Location 3717 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names VERIZON

05/25/24 13:25 Nathan Galloway

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

05/25/24 11:53 KALI CHANDLER

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

05/22/24 17:18 Susan Freeman IR #: S2024-01945

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Additional Incident Code(s) 116CM : CIVIL MATTER
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names JONATHAN DAVID THOMAS, ROBERT BRENT CLICK

03/05/24 18:17 Sage Logan

Primary Incident Code 1059WPN : DISCHARGE WEAPON
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

02/13/24 15:30 Brook Johnson

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

01/08/24 20:51 Sage Logan

Primary Incident Code 1066 : RECKLESS DRIVING**Location** 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611**Names** BRENT

12/23/23 21:38 Amber Barnard

IR #s: S2023-05186

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM**Location** 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611**Names** ROBERT BRENT CLICK

11/14/23 04:24 Ashley Stelline

Primary Incident Code 1080 : SUSPICIOUS PERSON**Location** 3671 CALHOUN MEM HWY, GREENVILLE, SC 29611**Names** BRENT CLICK

10/25/23 00:43 Amber Barnard

Ext. #s: 14CRFD2300492, EMS2314537, R82301318

Primary Incident Code 1050IN : MVA WITH INJURY**Location** 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611**Names** VERIZON

09/14/23 17:08 Haylie Stanley

Primary Incident Code 1049 : DISTURBANCE**Location** 3671 CALHOUN MEM HWY, GREENVILLE, SC 29611**Names** ROBERT BRENT CLICK

05/29/23 15:42 Tianna Jackson

Primary Incident Code 1049 : DISTURBANCE**Location** 3668 CALHOUN MEM HWY, GREENVILLE**Names** BRENT CLICK

12/01/22 15:36 Tianna Jackson

Primary Incident Code 1049 : DISTURBANCE**Additional Incident Code(s)** 134AN : ANIMAL COMPLAINT**Location** 3668 CALHOUN MEM HWY, GREENVILLE**Names** BRENT CLICK

10/21/22 17:29 Abbigail Holder

Primary Incident Code 1058 : TRESPASSING**Location** 3668 CALHOUN MEM HWY, GREENVILLE**Names** ROBERT BRENT CLICK

10/18/22 07:14 Abigall Lee

IR #s: S2022-05221

Primary Incident Code 1072 : LARCENY

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

10/09/22 03:06 Michelle Mast

Primary Incident Code 1073 AUTO : BREAK IN / VEH
Additional Incident Code(s) 1080IP : SUSPICIOUS PERSON IN PROGRESS
Location 3672 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ANTHONY R TIPTON, CLICK, BRENT

07/24/22 21:38 Jessica Chappell

Primary Incident Code 1059WPN : DISCHARGE WEAPON
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names BRENT CLICK

03/30/22 14:08 Michelle Mast

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names CLICK, BRENT



PICKENS COUNTY SHERIFF'S OFFICE

216 C. DAVID STONE ROAD • PICKENS, SOUTH CAROLINA 29671

Incident Report

Communications Report / CAD

Inmate Booking Report

CFS Log

Printed on July 22, 2024

Date Range	between 1/1/2022 and 7/22/2024	Status	Any Status	Dispatch Agency	Pickens County 911 - Pickens County 911
IR	All Incidents	Call Taker	All Call Takers	Responder Agency	All Agencies
Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street		Name	Jonathan thomas	Phone #	
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

06/30/24 19:09 Amber Barnard IR #s: S2024-02492

Primary Incident Code 129HP : HANDLE BY PHONE

Location 3670 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names JONATHAN DAVID THOMAS, JONATHAN THOMAS

05/22/24 17:18 Susan Freeman IR #s: S2024-01945

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM

Additional Incident Code(s) 116CM : CIVIL MATTER

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names JONATHAN DAVID THOMAS, ROBERT BRENT CLICK

10/07/23 20:56 Amber Barnard IR #s: S2023-04162

Primary Incident Code TS : TRAFFIC STOP 1048

Location 8349 MOOREFIELD MEMORIAL HWY, LIBERTY, SC (V GO)

Names SHELIA MICHELLE CHAPMAN, JONATHAN THOMAS KEY, KATHY J JAMES, Unknown

09/18/23 10:26 Lisa Ellison

Primary Incident Code 1072 : LARCENY

Location 3670 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names THOMAS, JONATHAN

08/03/23 01:28 Briana Smith

Primary Incident Code 1047 : SUSPICIOUS VEHICLE

Location MOOREFIELD MEM HWY / TURNER RD, LIBERTY, SC 29657

Names JONATHAN THOMAS KEY, Unknown



PICKENS COUNTY SHERIFF'S OFFICE

216 C. DAVID STONE ROAD • PICKENS, SOUTH CAROLINA 29671

Incident Report

Communications Report / CAD

Inmate Booking Report

CFS Log

Printed on July 22, 2024

Date Range	between 1/1/2022 and 7/22/2024	Status	Any Status	Dispatch Agency	Pickens County 911 - Pickens County 911
IR	All Incidents	Call Taker	All Call Takers	Responder Agency	All Agencies
Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street		Name	All Tech	Phone #	
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

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PICKENS COUNTY SHERIFF'S OFFICE

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IR	All Incidents	Call Taker	All Call Takers	Responder Agency	All Agencies
Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street	3770 Calhoun Mem	Name		Phone #	
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

ELECTRONICALLY FILED - 2024 Aug 07 2:21 PM - PICKENS - COMMON PLEAS - CASE#2020CP3900266



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IR	All Incidents	Call Taker	All Call Takers	Responder Agency	All Agencies
Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street	3668 Calhoun Mem	Name		Phone #	
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

07/03/24 17:06 Susan Freeman

Primary Incident Code 114CR : WARRANT ARREST SEARCH ORDER DETENTION
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names Unknown

05/25/24 13:25 Nathan Galloway

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

05/25/24 11:53 KALI CHANDLER

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

05/22/24 17:18 Susan Freeman IR #s: S2024-01945

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Additional Incident Code(s) 116CM : CIVIL MATTER
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names JONATHAN DAVID THOMAS, ROBERT BRENT CLICK

03/05/24 18:17 Sage Logan

Primary Incident Code 1059WPN : DISCHARGE WEAPON
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

02/15/24 16:14 Briana Smith

Primary Incident Code 134AN : ANIMAL COMPLAINT
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names Unknown

02/13/24 15:30	Brook Johnson
----------------	---------------

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

01/08/24 20:51	Sage Logan
----------------	------------

Primary Incident Code 1066 : RECKLESS DRIVING
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names BRENT

01/08/24 16:51	Haylie Stanley
----------------	----------------

Primary Incident Code 129HP : HANDLE BY PHONE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names SUSAN

01/08/24 15:05	Susan Freeman
----------------	---------------

Primary Incident Code 100PS : PUBLIC SERVICE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names MONIQUE HILLMAN

12/27/23 11:46	Cathy Coster
----------------	--------------

Primary Incident Code 100PS : PUBLIC SERVICE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names MONIQUE HILLMAN

12/27/23 10:57	Lakay Blakely
----------------	---------------

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ORTAGUS DEMETRICE BENNETT, MONIQUE HILLMAN

12/27/23 10:26	Melissa Billingsley
----------------	---------------------

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names MONIQUE HILLMAN

12/23/23 21:38	Amber Barnard	IR #: S2023-05186
----------------	---------------	-------------------

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

10/25/23 00:43	Amber Barnard	Ext. #: 14CRFD2300492, EMS2314537, R82301318
----------------	---------------	--

Primary Incident Code 1050IN : MVA WITH INJURY

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names VERIZON

09/23/23 22:08 Crystal Gosciniak

Primary Incident Code 1080 : SUSPICIOUS PERSON

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names Unknown

09/17/23 20:18 Gracie Crenshaw

Primary Incident Code 100REPO : REPOSSESSION

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names 85 TOWING AND RECOVERY

05/29/23 15:42 Tianna Jackson

Primary Incident Code 1049 : DISTURBANCE

Location 3668 CALHOUN MEM HWY, GREENVILLE
Names BRENT CLICK

03/23/23 10:39 Haylie Stanley

IR #: S2023-01207

Primary Incident Code 1049 : DISTURBANCE

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

12/15/22 09:16 KALI CHANDLER

Primary Incident Code 100FLU : FOLLOW UP

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names Unknown

12/08/22 16:27 Suzanne Guthrie

Primary Incident Code 1049 : DISTURBANCE

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names BRETT

12/01/22 15:36 Tianna Jackson

Primary Incident Code 1049 : DISTURBANCE

Additional Incident Code(s) 134AN : ANIMAL COMPLAINT

Location 3668 CALHOUN MEM HWY, GREENVILLE
Names BRENT CLICK

10/21/22 17:29 Abbigail Holder

Primary Incident Code 1058 : TRESPASSING

Location 3668 CALHOUN MEM HWY, GREENVILLE

Names ROBERT BRENT CLICK

10/18/22 07:14 Abigail Lee IR #: S2022-05221

Primary Incident Code 1072 : LARCENY

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names ROBERT BRENT CLICK

07/24/22 21:38 Jessica Chappell

Primary Incident Code 1059WPN : DISCHARGE WEAPON

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names BRENT CLICK

04/21/22 13:04 KALI CHANDLER

Primary Incident Code 100FLU : FOLLOW UP

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names Unknown

04/21/22 11:43 Tianna Jackson

Primary Incident Code 131WB : WELL BEING CHECK

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names ROGER WARREN

03/30/22 14:08 Michelle Mast

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM

Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611

Names CLICK, BRENT



PICKENS COUNTY SHERIFF'S OFFICE

216 C. DAVID STONE ROAD • PICKENS, SOUTH CAROLINA 29671

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Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street		Name	hyper formance	Phone #	
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

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Date Range	between 1/1/2022 and 7/22/2024	Status	Any Status	Dispatch Agency	Pickens County 911 - Pickens County 911
IR	All Incidents	Call Taker	All Call Takers	Responder Agency	All Agencies
Responder Unit	All Units	Responder Personnel	All Personnel	Incident Code	
Street		Name	click, ro	Phone #	
CFS / IR #		Disposition		Beat	All Beats
Plate #		Other			

05/25/24 13:25 Nathan Galloway

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

05/25/24 11:53 KALI CHANDLER

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

05/22/24 17:18 Susan Freeman IR #s: S2024-01945

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM.
Additional Incident Code(s) 116CM : CIVIL MATTER
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names JONATHAN DAVID THOMAS, ROBERT BRENT CLICK

03/05/24 18:17 Sage Logan

Primary Incident Code 1059WPN : DISCHARGE WEAPON
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

02/13/24 15:30 Brook Johnson

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

12/23/23 21:38 Amber Barnard IR #s: S2023-05186

Primary Incident Code 1077 : MALICIOUS DAMAGE VANDALISM
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

09/14/23 17:08 Haylie Stanley

Primary Incident Code 1049 : DISTURBANCE
Location 3671 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

03/23/23 10:39 Haylie Stanley IR #: S2023-01207

Primary Incident Code 1049 : DISTURBANCE
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

10/21/22 17:29 Abbigail Holder

Primary Incident Code 1058 : TRESPASSING
Location 3668 CALHOUN MEM HWY, GREENVILLE
Names ROBERT BRENT CLICK

10/18/22 07:14 Abigail Lee IR #: S2022-05221

Primary Incident Code 1072 : LARCENY
Location 3668 CALHOUN MEM HWY, GREENVILLE, SC 29611
Names ROBERT BRENT CLICK

FireDist

BEREA FIRE DISTRICT

SO2334

Case Number

No Case Numbers

Attachments

No Attachments

Dispositions

Date	Time	Unit	Disposition	User
7/2/2024	15:10:11		08_Another Agency	SO1248

Supplemental Person

No Supplemental Persons

Supplemental Property

No Supplemental Property

Supplement Vehicle

No Supplemental Vehicles

Supplemental Weapon

No Supplemental Weapons

STATE OF SOUTH CAROLINA)
COUNTY OF PICKENS) IN THE COURT OF COMMON PLEAS
) THIRTEENTH JUDICIAL CIRCUIT
Click Properties, LLC)
And Hyper Formance, LLC,)
) CASE #: 2020-CP-39-00266
Plaintiffs,)
))
vs.) DEFENDANTS' REQUEST FOR SITE
) VISIT BY THE TRIAL JUDGE
Thomas SC Properties, LLC)
And All-Tech Tire and)
Auto Repair)
))
Defendants.)
.)

Defendants believe that the issues on abatement can only be understood by the Trial Judge visiting the property and viewing the premises and work completed. Therefore, defendants request that the Trial Judge do a site inspection of the premises involved.

Respectfully submitted,

S/James C. Alexander
James C. Alexander
The Alexander Law Firm, LLC
Attorney for Defendants
Attorney at Law
Post Office Box 898
Pickens, SC 29671
864-898-3208

Pickens, South Carolina
August 5, 2024

Defendants' exhibit # 25

7/2/2024	14:45:35	IntersectionStreetID	NULL	371990	Viewer) (Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Cross_Street	DEBORAH LN/ STANLEY DR		(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Address	STANLEY/ Saluda Dam Rd	STANLEY DR / SALUDA DAM RD	Change Verified	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF04B	SO1248
7/2/2024	14:48:54	Address	STANLEY DR / SALUDA DAM RD	15 SALUDA DAM RD	Address Change	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Address	STANLEY DR / SALUDA DAM RD	15 SALUDA DAM RD	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Latitude	34856523	34857032	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Longitude	82474571	82463065	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	PremiseID	NULL	29272	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Street_Id	371481	1058462	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	IntersectionStreetID	371990	NULL	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Location_Name		SCDMV on Saluda Dam Rd	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Cross_Street		WHITE HORSE RD/ BROADWAY DR	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Location_Type		Government Building	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Address	15 SALUDA DAM RD	15 SALUDA DAM RD	Premise Verified	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:57	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF04B	SO1248

Custom Time Stamps

No Custom Time Stamps

Custom Data Fields

Description	Data	User
FireDist	BEREA FIRE DISTRICT	SO1248
FireDist	BEREA FIRE DISTRICT	SO1248
FireDist	BEREA FIRE DISTRICT	SO2334

jcalexander@thealexanderlawfirm.com

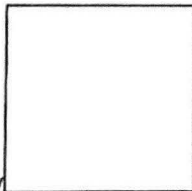
From: jcalexander@thealexanderlawfirm.com
Sent: Monday, August 5, 2024 4:03 PM
To: 'Morgan, Grenville D. Law Clerk (Jonathan Umbriano)'
Cc: 'Brad Martin'; 'Laura Teer'; 'Peggy McComb'
Subject: FW: PARAGRAPH 15 THOMAS AFFIDAVIT

Fifth video sent for paragraph 15 of the Thomas affidavit.

James C. Alexander
The Alexander Law Firm LLC
P.O. Box 618
Pickens, SC 29671
864-898-3208
864-898-3408 (Fax)

From: JONATHAN THOMAS <alltechthomas@gmail.com>
Sent: Monday, August 5, 2024 10:25 AM
To: Jim Alexander <jcalexander@thealexanderlawfirm.com>
Subject: PARAGRAPH 15 THOMAS AFFIDAVIT

_clicks harrassing me.mov



jcalexander@thealexanderlawfirm.com

From: jcalexander@thealexanderlawfirm.com
Sent: Monday, August 5, 2024 3:57 PM
To: 'Morgan, Grenville D. Law Clerk (Jonathan Umbriano)'
Cc: 'Brad Martin'; 'Laura Teer'; 'Peggy McComb'
Subject: FW: PARAGRAPH 8 THOMAS AFFIDAVIT
Attachments: Click harrasing the builder during construction.MOV

Second video sent for paragraph 8 of the Thomas Affidavit.

James C. Alexander
The Alexander Law Firm LLC
P.O. Box 618
Pickens, SC 29671
864-898-3208
864-898-3408 (Fax)

From: JONATHAN THOMAS <alltechthomas@gmail.com>
Sent: Monday, August 5, 2024 10:08 AM
To: Jim Alexander <jcalexander@thealexanderlawfirm.com>
Subject: PARAGRAPH 8 THOMAS AFFIDAVIT

7/2/2024	14:41:58	Battalion		SOW8	Viewer) (Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Division		SOW	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Jurisdiction		SHERIFF	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Incident_Type		1 DEPUTY	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Priority_Number	0	1		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Priority_Description		Emergency		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	ResponsePlanType	0	1	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	DispatchLevel		Normal	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Response_Plan		1D-08	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Problem		49B_Discharging Weapon	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:23	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Response_Plan		1D-08	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Problem		49B_Discharging Weapon	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	DispatchLevel		Normal	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	ResponsePlanType	0	1	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Priority_Description		Emergency		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Priority_Number	0	1		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Incident_Type		1 DEPUTY	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:32	Read Call	False	True	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:44:34	Caller_Name	VERIZON	BRENT CLICK	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:45:27	Address	292-299 Saluda Dam Rd	STANLEY/ Saluda Dam Rd	Address Change	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Address	292-299 Saluda Dam Rd	STANLEY DR / SALUDA DAM RD	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Latitude	0	34856523	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Longitude	0	82474571	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Street_Id	371480	371481	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248

~~Speaker 1 [Brent Click]- 911 Brent Click~~
~~Speaker 2 [911 Operator] - 911 operator~~

00:05:03 Speaker 2 [911 Operator]

All right, we have a route to that location. You said that you saw them go towards Pickens.

00:05:09 Speaker 1 [Brent Click]

Yeah, they went for Pickens.

00:05:12 Speaker 2 [911 Operator]

OK. And you couldn't get a?

00:05:15 Speaker 1 [Brent Click]

I got a photo and maybe.

00:05:17 Speaker 1 [Brent Click]

Maybe on a computer you can read the tags, but there's something covering the second-half of the tag.

00:05:29 Speaker 1 [Brent Click]

If it's a customer car, they'll end up taking it back to my neighbors shop so.

00:05:39 Speaker 1 [Brent Click]

I just if it's Pickens County, they're just going to, they're just going to gaslight us and defend my neighbor. They're making money off my neighbor selling meth out of the office. So take a look.

00:05:48 Speaker 1 [Brent Click]

Was it a long one or short one.

Speaker 2 [911 Operator]

It was a short. It was like a internal hammer. It was like a knock off glock.

00:05:57 Speaker 1 [Brent Click]

Smaller 9mm.

00:06:01 Speaker 1 [Brent Click]

It is one of those ***** little internal hammer guns.

FireDist

BEREA FIRE DISTRICT

SO2334

Case Number

No Case Numbers

Attachments

No Attachments

Dispositions

Date	Time	Unit	Disposition	User
7/2/2024	15:10:11		08_Another Agency	SO1248

Supplemental Person

No Supplemental Persons

Supplemental Property

No Supplemental Property

Supplement Vehicle

No Supplemental Vehicles

Supplemental Weapon

No Supplemental Weapons

Time Stamps

Description	Date	Time	User
Phone Pickup	7/2/2024	14:41:43	
1st Key Stroke	7/2/2024	14:41:44	
In Pending Queue	7/2/2024	14:44:23	
Call Taking Complete	7/2/2024	14:47:52	Whitner, Marcus
1st Unit Assigned	7/2/2024	14:48:10	
1st Unit Enroute	7/2/2024	14:48:15	
1st Unit Arrived	7/2/2024	14:55:46	
Incident Under Control			
Time Sent to Other CAD			
Incident Closed	7/2/2024	15:10:11	Gantt, Theresa 353

Elapsed Times

Description	Time
Received to In Queue	00:02:39
Call Taking	00:06:08
In Queue To 1st Assign	00:03:47.9
Call Received to 1st Assign	00:06:27.9
Assigned to 1st Enroute	00:00:04.1
Enroute to 1st Arrived	00:07:30.8
Incident Duration	00:28:28

ANI/ALI Calls

Time Received	Phone Number	Address	City
7/2/2024 2:41 PM	843-340-3965		D

Units Assigned

Unit	Assigned	Disposition	Enroute	Staged	Arrived	At Patient	Delay Avail	Complete	Odm. Enroute	Odm. Arrived	Cancel Reason
C28SO	7/2/2024 14:48:10		7/2/2024 14:48:15					7/2/2024 14:55:48			REA_Reassigned
E58SO	7/2/2024 14:50:52	08_Another Agency	7/2/2024 14:50:52		7/2/2024 14:55:46			7/2/2024 15:10:11			

Personnel Assigned

Unit	Name
E58SO	Gray, Christopher E58 (SO1943)
C28SO	Koons, David C28 (SO2319)

Pre-Scheduled Information

No Pre-Scheduled Information

Special Equipment

No Special Equipment

Transports

No Transports

Transport Legs

No Transport Legs

Comments

Date	Time	User	Type	Confidential	Comment
7/2/2024	14:41:44	SYS	Response		[1] ***ADD'L Wireless Info : 'WIRELESS CALL QUERY CALLER FOR

00:03:00 Speaker 1 [Brent Click]

Alright.

00:03:05 Speaker 2 [911 Operator]

What's the phone number for you?

00:03:18 Speaker 1 [Brent Click]

I've been in a dispute with my neighbor legally and they're kind of they've shot at us before on our property, but never.

00:03:18 Speaker 2 [911 Operator]

OK.

00:03:26 Speaker 2 [911 Operator]

Do you think it could be your neighbor?

00:03:29 Speaker 1 [Brent Click]

If anything, it was one of his employees because the guy had a darker arm and it was either either the really tan or he had an arm and I thought there was a bracelet on it so it could have been there, one employee, Chester Lee. But they drive customer cars all the time. So like.

00:03:47 Speaker 1 [Brent Click]

I I've had issues with them in the past like driving by and shooting our building and stuff at night, but Pickens County won't even give us a police report on it. They're so ***** corrupt. That's why this is just going to be Pickens County I don't want to even

00:03:57 Speaker 1 [Brent Click]

Want to make this report?

Speaker 2 [911 Operator]

Where would you like to meet one of our deputies.

EX C
ELECTRONICALLY FILED - 2023 Feb 15 10:42:56 PM - PICESKENS - COMMON FILEAS - CASE# 202301233002466

Tommy Hood
8649081165

Tommy Hood <tommyhoodengineering@gmail.com>
To: JONATHAN THOMAS <alltechthomas@gmail.com>

Thu, Jan 26, 2023 at 4:12 AM

it's intended for the existing slope. It can be modified for the driveway going up with the geogrid going across further.
the bearing capacity mentioned in the first note is the bearing capacity of the soil under the wall.
the last two notes cover large loads that would impact the wall if they're at the top of the wall with this design. the geogrid would need to go back further but I'm not sure that it can.
[Quoted text hidden]

JONATHAN THOMAS <alltechthomas@gmail.com>
To: Tommy Hood <tommyhoodengineering@gmail.com>

Thu, Jan 26, 2023 at 5:38 AM

I'm gonna require another site visit so you can look at the property and take any measurements needed to be sure this design will work and still allow access to both properties. Can you let me know when you are available
[Quoted text hidden]

30

01571

No Transport Priority Changes

Alarm Level Changes

No Alarm Level Changes

Activity LOG

Date	Time	Unit	Activity	Location	Log Entry	User
7/2/2024	14:42:14		Problem Nature		Incident problem nature changed from <Blank> to 49B_Discharging Weapon~SO	SO2334
7/2/2024	14:44:23		Incident in Waiting Queue			
7/2/2024	14:44:23		ANI/ALI Statistics		INT Insert:Jul 02 2024 14:41:44 / INT SendNP:Jul 02 2024 14:41:43 / WS RecvNP:Jul 02 2024 14:41:43 / WS Process:Jul 02 2024 14:44:23	SO2334
7/2/2024	14:44:23		Waiting Pending Incident Time Warning		Waiting Pending Incident Time Warning timer expired	
7/2/2024	14:44:32		Read Incident		Incident 362 was Marked as Read.	SO1248
7/2/2024	14:45:23		Remove Waiting Pending Incident Warning		Removing Waiting Pending Incident Time Warning timer expired	
7/2/2024	14:45:23		Pending Incident Time Warning		Pending Incident Time Warning timer expired	
7/2/2024	14:45:23		Incident Late			
7/2/2024	14:48:10		Incident Timer Clear	STANLEY DR / SALUDA DAM RD	Incident Late Timer cleared for SO240702-109389	SO1248
7/2/2024	14:48:10	C28SO	Dispatched	W STONE AVE\WILTON ST		SO1248
7/2/2024	14:48:15	C28SO	Enroute	STANLEY DR / SALUDA DAM RD	Responding From = W STONE AVE\WILTON ST.	SO1248
7/2/2024	14:50:52	E58SO	Dispatched	PENDLETON ST\TRACTION ST		SO1248
7/2/2024	14:50:52	E58SO	Enroute	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]	Responding From = PENDLETON ST\TRACTION ST.	SO1248
7/2/2024	14:50:52	C28SO	Unit Backed up	W STONE AVE\WILTON ST	Backed up with E58SO	SO1248
7/2/2024	14:55:46	E58SO	At Scene	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]		SO1248
7/2/2024	14:55:48	C28SO	Available	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]	Unit Cleared From Incident SO240702-109389	SO1248
7/2/2024	14:55:48	C28SO	Reassign Vehicle	PETE HOLLIS BLVD\ALEXANDER ST	ReAssign Reason: REA_Reassigned	SO1248

Speaker 1 [Brent Click]- 911 Brent Click
Speaker 2 [911 Operator] - 911 operator

07-02-24_14.41.26_911_Geso-Lec__911_GCSO_9__Redacted (2).wav

Transcript

00:00:18 Speaker 2 [911 Operator]

911 What's the location of your emergency?

00:00:21 Speaker 1 [Brent Click]

North Fish Trap and Saluda Dam, but if it's Pickens County don't bother.

00:00:26 Speaker 1 [Brent Click]

If it's Greenville County, we'll yeah, go.

Speaker 1 [Brent Click]

I just had a vehicle shoot at me,

Speaker 2 [911 Operator]

OK? And you were. What was that address? You said it was Saluda.

Speaker 1 [Brent Click]

Saluda Dam, I went ahead and made sure I was in Greenville County before I called, but I just had a guy in a red SUV. I took a photo of his license plate. He shot at me.

00:00:46 Speaker 1 [Brent Click]

Several times and I don't know why.

Speaker 2 [911 Operator]

OK, what what was the? Were they South Carolina plates? And can I have that number?

Speaker 1 [Brent Click]

01573

Kind of watch to make sure he doesn't come back

Speaker 1 [Brent Click]- 911 Brent Click
Speaker 2 [911 Operator] - 911 operator

You can't get a description of the male well.

00:02:08 Speaker 2 [911 Operator]

Was he white

00:02:08 Speaker 1 [Brent Click]

Black or Hispanic? I I I did. I did not see. I was. I. All I saw was the gun out of the window. And I looked down and ducked and hit the brakes. So.

00:02:19 Speaker 1 [Brent Click]

I smell like gunpowder right now. It went. It went off so close to me, I smell like.

00:02:23 Speaker 2 [911 Operator]

Gunpowder. How many times did he shoot?

00:02:26 Speaker 1 [Brent Click]

Uh, two or three times.

00:02:31 Speaker 1 [Brent Click]

The first one I don't think I realized was a gunshot at first, and then I yeah.

00:02:36 Speaker 1 [Brent Click]

How do you miss somebody from three feet away? That's that's. That's that. I'm. I'm. I'm glad.
But ****, what the hell?

00:02:44 Speaker 2 [911 Operator]

OK, which direction did he go in?

00:02:46 Speaker 1 [Brent Click]

He went toward Pickens.

00:02:58 Speaker 2 [911 Operator]

What's your name, Sir?

Time Stamps

Description	Date	Time	User
Phone Pickup	7/2/2024	14:41:43	
1st Key Stroke	7/2/2024	14:41:44	
In Pending Queue	7/2/2024	14:44:23	
Call Taking Complete	7/2/2024	14:47:52	Whitner, Marcus
1st Unit Assigned	7/2/2024	14:48:10	
1st Unit Enroute	7/2/2024	14:48:15	
1st Unit Arrived	7/2/2024	14:55:46	
Incident Under Control			
Time Sent to Other CAD			
Incident Closed	7/2/2024	15:10:11	Gantt, Theresa 353

Elapsed Times

Description	Time
Received to In Queue	00:02:39
Call Taking	00:06:08
In Queue To 1st Assign	00:03:47.9
Call Received to 1st Assign	00:06:27.9
Assigned to 1st Enroute	00:00:04.1
Enroute to 1st Arrived	00:07:30.8
Incident Duration	00:28:28

ANI/ALI Calls

Time Received	Phone Number	Address	City
7/2/2024 2:41 PM	843-340-3965		D

Units Assigned

Unit	Assigned	Disposition	Enroute	Staged	Arrived	At Patient	Delay Avail	Complete	Odm. Enroute	Odm. Arrived	Cancel Reason
C28SO	7/2/2024 14:48:10		7/2/2024 14:48:15					7/2/2024 14:55:48			REA_Reassigned
E58SO	7/2/2024 14:50:52	08_Another Agency	7/2/2024 14:50:52		7/2/2024 14:55:46			7/2/2024 15:10:11			

Personnel Assigned

Unit	Name
E58SO	Gray, Christopher E58 (SO1943)
C28SO	Koons, David C28 (SO2319)

Pre-Scheduled Information

No Pre-Scheduled Information

Special Equipment

No Special Equipment

Transports

No Transports

Transport Legs

No Transport Legs

Comments

Date	Time	User	Type	Confidential	Comment
7/2/2024	14:41:44	SYS	Response		[1] ***ADD'L Wireless Info : 'WIRELESS CALL QUERY CALLER FOR

Incident Detail Report

Incident Status Closed
Incident Number SO240702-109389
Incident Date 7/2/2024 14:41:44

Incident Information

Incident Type: 1 DEPUTY
Priority: Deputy Req 1025
Determinant:
Base Response #:
Confirmation #: 07022024-0103295
Taken By: Whitner, Marcus 367
Response Area: SO8B
Disposition: 08_Another Agency
Cancel Reason:
Incident Status: Closed
Certification:
Longitude: 82463065
MGRS: 17SLU6625658164

Alarm Level:
Problem: 49B_Discharging Weapon
Agency: SHERIFF
Jurisdiction: SHERIFF
Division: SOW
Battalion: SOW8
Response Plan: 1D-08
Command Ch:
Primary TAC:
Alternate TAC:
Delay Reason:
Latitude: 34857032
UTM: 175 366256 3858165

Incident Location

Location Name: SCDMV on Saluda Dam Rd
Address: 15 SALUDA DAM RD
Apartment:
Building:
City, State, Zip: (C) GREENVILLE, SC 29611

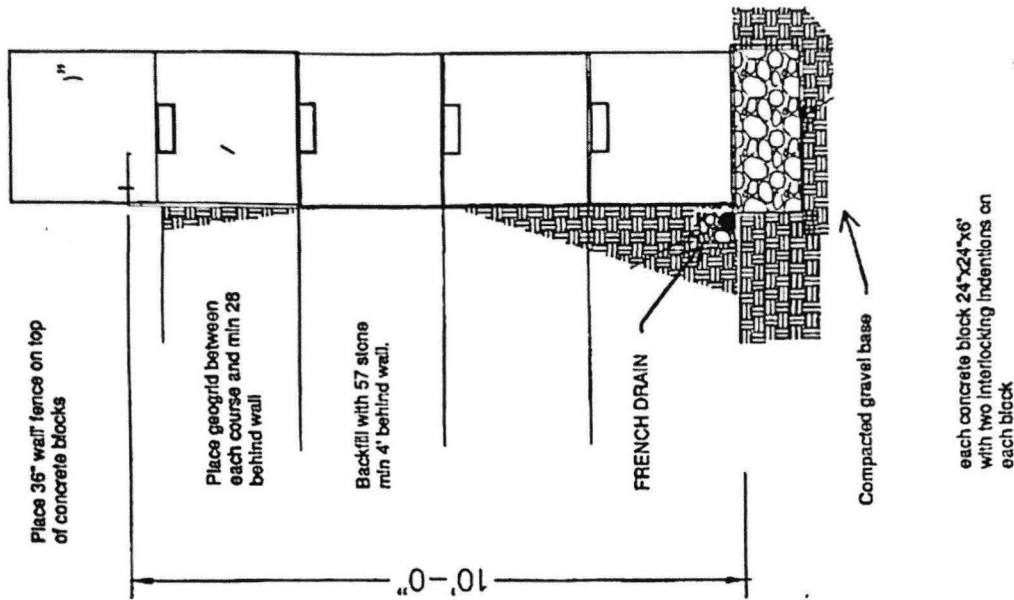
County: GREENVILLE
Location Type: Government Building
Cross Street: WHITE HORSE RD/BROADWAY DR
Tow Provider Area: SO-8
Map Reference:

Call Receipt

Caller Name: BRENT CLICK
Method Received:
Caller Type:
Caller Address:
Caller City, State, Zip: ,

Call Back Phone: 843-340-3965
Caller Location:
Caller Apt/Bldg: /
Caller County:

EXB B



10' RETAINING WALL DETAIL
SCALE: 3/8"=1'-0"

Wall detail covers wall up to 10' backfill

Hyper Formance/PC Bldg. S...

3670 Calhoun Mem Hwy, Easley, SC 29611

CONSTRUCTION NOTES:

WALLS ARE DESIGNED FOR 2,000 PSF BEARING CAPACITY. ALL FOOTINGS SHALL BEAR ON ORIGINAL, UNDISTURBED SOIL, IF POSSIBLE. ALL STRUCTURAL FILL SHALL BE TESTED BY A GEOTECHNICAL ENGINEER AND MUST REACH 95% COMPACTION FOR EACH LIFT.

ALL CONCRETE TO BE 3,000 PSI NW.

PROVIDE POSITIVE DRAINAGE AWAY FROM THE RETAINING WALL DURING CONSTRUCTION AND PERMANENTLY.

DO NOT OPERATE ANY HEAVY EQUIPMENT NEAR THE RETAINING WALL.

NO SURCHARGE LOAD OR UPSLOPE INCLINE OF BACKFILL WITHIN 10 FEET OF WALL.



Speaker 1 [Brent Click]- 911 Brent Click
Speaker 2 [911 Operator] - 911 operator

00:06:06 Speaker 1 [Brent Click]

Regular magazine, nothing extended, just, you know.

00:06:10 Speaker 1 [Brent Click]

It happened so fast.

00:06:15 Speaker 2 [911 Operator]

OK. All right. We have deputies there route to.

00:06:18 Speaker 1 [Brent Click]

Thank you. I'm going to meet them. I'm heading back in the parking lot right now.

00:06:19 Speaker 2 [911 Operator]

Right.

00:06:23 Speaker 1 [Brent Click]

Right.

Incident Detail Report

Incident Status Closed
Incident Number SO240702-109389
Incident Date 7/2/2024 14:41:44

Incident Information

Incident Type: 1 DEPUTY
Priority: Deputy Req 1025
Determinant:
Base Response #:
Confirmation #: 07022024-0103295
Taken By: Whitner, Marcus 367
Response Area: SO8B
Disposition: 08_Another Agency
Cancel Reason:
Incident Status: Closed
Certification:
Longitude: 82463065
MGRS: 17SLU6625658164

Alarm Level:
Problem: 49B_Discharging Weapon
Agency: SHERIFF
Jurisdiction: SHERIFF
Division: SOW
Battalion: SOW8
Response Plan: 1D-08
Command Ch:
Primary TAC:
Alternate TAC:
Delay Reason:
Latitude: 34857032
UTM: 17S 366256 3858165

Incident Location

Location Name: SCDMV on Saluda Dam Rd
Address: 15 SALUDA DAM RD
Apartment:
Building:
City, State, Zip: (C) GREENVILLE, SC 29611

County: GREENVILLE
Location Type: Government Building
Cross Street: WHITE HORSE RD/BROADWAY DR
Tow Provider Area: SO-8
Map Reference:

Call Receipt

Caller Name: BRENT CLICK
Method Received:
Caller Type:
Caller Address:
Caller City, State, Zip: ,

Call Back Phone: 843-340-3965
Caller Location:
Caller Apt/Bldg: /
Caller County:

Date	Time	System	Response	Response	Response
7/2/2024	14:41:44	SYS	Response		LOCATION QUERY CALLER FOR PHONE # ***
7/2/2024	14:41:58	SYS	Response		[2] ***Class of Service: WPH2 LAT: +34.856421 LON: -082.474472***
7/2/2024	14:44:21	SO2334	Response		[3] Multiple Response Areas found. Response Area Choices: SO8B,SO8A
7/2/2024	14:44:38	SO2334	Response		[4] 1024 1049B// UNKNOWN RACE, RED DODGE DURANGO, RIMS, SPECIALTY SC TAGS// 1024 STS THAT HE WAS SHOT AT TWICE //DRIVING TOWARDS PICKENS
7/2/2024	14:45:17	SO2334	Response		[5] 1024 REQ 1019
7/2/2024	14:45:35	SYS	Response		[6] [Notification] [SHERIFF]-1024 BELIEVES THAT IT COULD HAVE BEEN AN EMPLOYEE OF HIS NEIGHBOR
7/2/2024	14:46:18	SO2334	Response		[7] Multiple Response Areas found. Response Area Choices: SO8B,SO8A
7/2/2024	14:46:59	SO2334	Response		[8] [Notification] [SHERIFF]-1024 IS ON A WHITE AND BLUE MOTORCYCLE
7/2/2024	14:47:30	SO2334	Response		[9] [Notification] [SHERIFF]-1024 WAS ABLE TO TAKE A PHOTO OF THE SUBJECTS CAR
7/2/2024	14:49:20	SO1248	Response		[10] [Notification] [SHERIFF]-THE 1049 WAS A HANDGUN
7/2/2024	14:50:52	SO1248	Response		[11] INC OCC AT SALUDA DAM /STANLEY AREA08
7/2/2024	14:57:04	Gray, Christopher E58	Response	Yes	[12] Backed up C2850 with E58SO [13] E58SO - 10-24 DL NO 0100267544 DD# 3902050102283796587 CLICK,ROBERT BRENT 3668 CALHOUN MEMORIAL HWY GREENVILLE SC 296117027 PICK CNTY SEX M HGT 6 02 WGT 230 BIRTH 08/22/1989 EYE HAZ SSN ***-**-2414 RACE WHITE STATUS-DL:NO SUSPENSION CDL:NO DISQUALIFICATION DRIVER LICENSE CLASS D ISSUED 08/01/2020 DD# 3902050102283796587
7/2/2024	15:10:07	SO1248	Response		[14] E58SO 1049B INC OCC IN PICKENS CO OFF N FISHTRAP RD

Address Changes

Date	Time	Location/Address/Apt/Bldg	User
7/2/2024	14:45:35	City, State, Zip / 292-299 Saluda Dam Rd / (C) GREENVILLE, SC 29611	Gantt, Theresa 353
7/2/2024	14:48:56	SCDMV on Saluda Dam Rd / STANLEY DR / SALUDA DAM RD / (C) GREENVILLE, SC 29611	Gantt, Theresa 353

Priority Changes

Date	Time	Changed from Priority	Reason	User
7/2/2024	14:57:44	Deputy Req 1025 25	Default Reason	Gantt, Theresa 353

Transport Changes

No Transport Changes

Transport Priority Changes

Tommy Hood Emails

EX C

M Gmail

JONATHAN THOMAS <alltechthomas@gmail.com>


wall design

4 messages

Tommy Hood <tommyhoodengineering@gmail.com>
To: "alltechthomas@gmail.com" <alltechthomas@gmail.com>

Thu, Jan 26, 2023 at 3:33 AM

Tommy Hood
8649081165

 3670 Calhoun Mem Hwy pdf.pdf
194K

JONATHAN THOMAS <alltechthomas@gmail.com>
To: Tommy Hood <tommyhoodengineering@gmail.com>

Thu, Jan 26, 2023 at 3:58 AM

Thank you. I am going to need some clarification on a couple of things highlighted in the image below. Also is this wall design intended to be placed against the existing slopo or as a barrier that I can backfill against and create a straight driveway up to the back of my property or will it work for either?



3670 Calhoun Mem Hwy, Easley, SC 29611

CONSTRUCTION NOTES:

WALLS ARE DESIGNED FOR 2,000 PSF BEARING CAPACITY. ALL FOOTINGS SHALL BEAR ON ORIGINAL, UNDISTURBED SOIL, IF POSSIBLE. ALL STRUCTURAL FILL SHALL BE TESTED BY A GEOTECHNICAL ENGINEER AND MUST REACH 95% COMPACTION FOR EACH LIFT.

ALL CONCRETE TO BE 3,000 PSI MIN

Place 36" wall fence c
of concrete blocks

Place geogrid l
each course ar
behind wall

28

01581

FILED - 2023 JAN 26 PM 3:58 FROM - JONATHAN THOMAS - COMMUNICATIONS - CONSIDERED UNRELIABLE

Date	Time	System	Response	Yes	Details
7/2/2024	14:41:44	SYS	Response		LOCATION QUERY CALLER FOR PHONE # ***
7/2/2024	14:41:58	SYS	Response		[2] ***Class of Service: WPH2 LAT: +34.856421 LON: -082.474472***
7/2/2024	14:44:21	SO2334	Response		[3] Multiple Response Areas found. Response Area Choices: SO8B,SO8A
7/2/2024	14:44:38	SO2334	Response		[4] 1024 1049B// UNKNOWN RACE, RED DODGE DURANGO, RIMS, SPECIALTY SC TAGS// 1024 STS THAT HE WAS SHOT AT TWICE //DRIVING TOWARDS PICKENS
7/2/2024	14:45:17	SO2334	Response		[5] 1024 REQ 1019
7/2/2024	14:45:35	SYS	Response		[6] [Notification] [SHERIFF]-1024 BELIEVES THAT IT COULD HAVE BEEN AN EMPLOYEE OF HIS NEIGHBOR
7/2/2024	14:46:18	SO2334	Response		[7] Multiple Response Areas found. Response Area Choices: SO8B,SO8A
7/2/2024	14:46:59	SO2334	Response		[8] [Notification] [SHERIFF]-1024 IS ON A WHITE AND BLUE MOTORCYCLE
7/2/2024	14:47:30	SO2334	Response		[9] [Notification] [SHERIFF]-1024 WAS ABLE TO TAKE A PHOTO OF THE SUBJECTS CAR
7/2/2024	14:49:20	SO1248	Response		[10] [Notification] [SHERIFF]-THE 1049 WAS A HANDGUN
7/2/2024	14:50:52	SO1248	Response		[11] INC OCC AT SALUDA DAM /STANLEY AREA08
7/2/2024	14:57:04	Gray, Christopher E58	Response	Yes	[12] Backed up C28SO with E58SO [13] E58SO - 10-24 DL NO 0100267544 DD# 3902050102283796587 CLICK,ROBERT BRENT 3668 CALHOUN MEMORIAL HWY GREENVILLE SC 296117027 PICK CNTY SEX M HGT 6 02 WGT 230 BIRTH 08/22/1989 EYE HAZ SSN ***-**-2414 RACE WHITE STATUS-DL:NO SUSPENSION CDL:NO DISQUALIFICATION DRIVER LICENSE CLASS D ISSUED 08/01/2020 DD# 3902050102283796587
7/2/2024	15:10:07	SO1248	Response		[14] E58SO 1049B INC OCC IN PICKENS CO OFF N FISHTRAP RD

Address Changes

Date	Time	Location/Address/Apt/Bldg City, State, Zip	User
7/2/2024	14:45:35	/ 292-299 Saluda Dam Rd / (C) GREENVILLE, SC 29611	Gantt, Theresa 353
7/2/2024	14:48:56	SCDMV on Saluda Dam Rd / STANLEY DR / SALUDA DAM RD / (C) GREENVILLE, SC 29611	Gantt, Theresa 353

Priority Changes

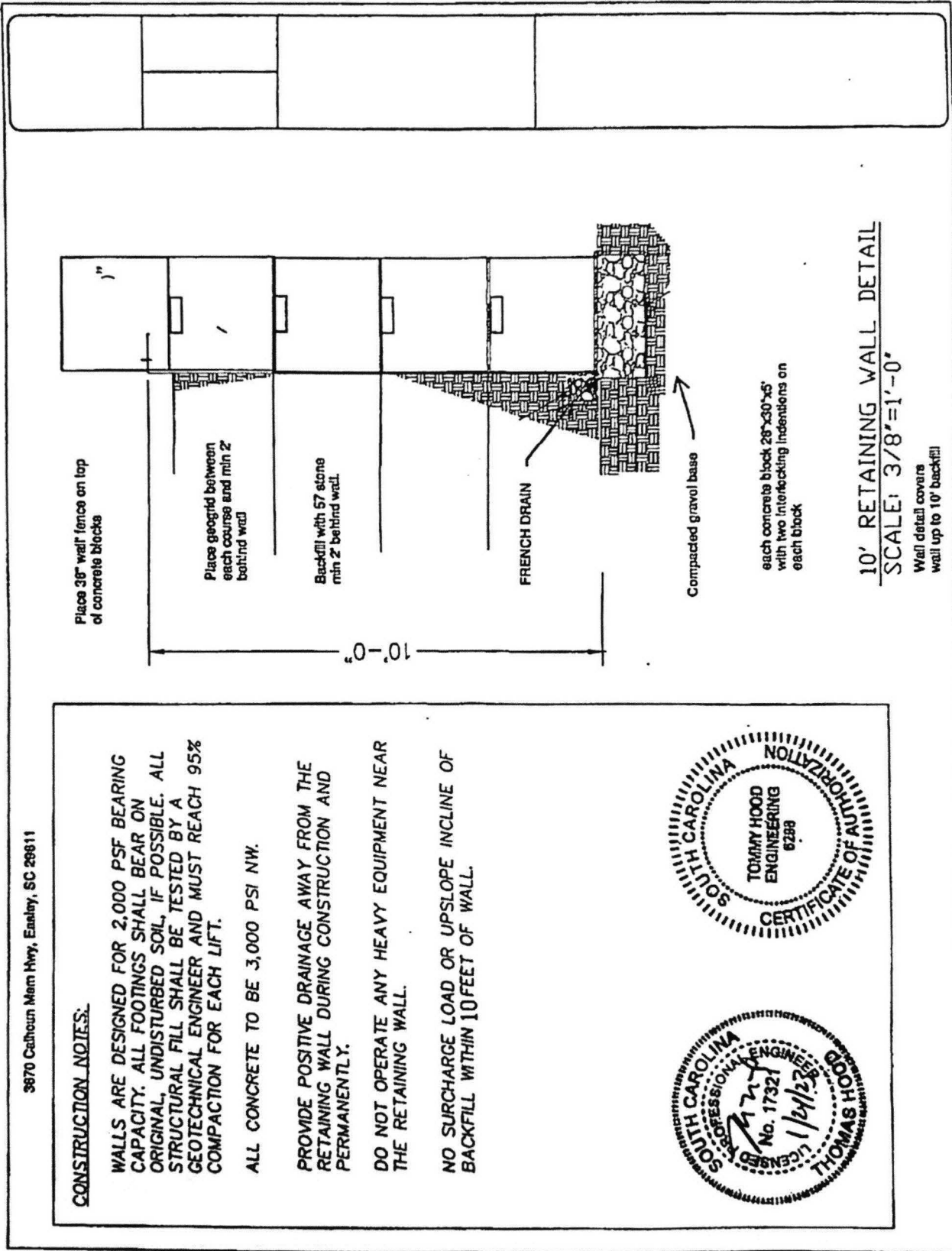
Date	Time	Changed from Priority	Reason	User
7/2/2024	14:57:44	Deputy Req 1025 25	Default Reason	Gantt, Theresa 353

Transport Changes

No Transport Changes

Transport Priority Changes

EX A



3870 Cathoun Mem Hwy, Easley, SC 29811

CONSTRUCTION NOTES:

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ALL CONCRETE TO BE 3,000 PSI NW.

PROVIDE POSITIVE DRAINAGE AWAY FROM THE RETAINING WALL DURING CONSTRUCTION AND PERMANENTLY.

DO NOT OPERATE ANY HEAVY EQUIPMENT NEAR THE RETAINING WALL.

NO SURCHARGE LOAD OR UPSLOPE INCLINE OF BACKFILL WITHIN 10 FEET OF WALL.



10' RETAINING WALL DETAIL
SCALE: 3/8"=1'-0"

Wall detail covers wall up to 10' backfill!

7/2/2024	14:41:58	Battalion		SOW8	Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Division		SOW	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Jurisdiction		SHERIFF	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Incident_Type		1 DEPUTY	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Priority_Number	0	1		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Priority_Description		Emergency		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	ResponsePlanType	0	1	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	DispatchLevel		Normal	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Response_Plan		1D-08	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:42:14	Problem		49B_Discharging Weapon	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:23	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Response_Plan		1D-08	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Problem		49B_Discharging Weapon	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	DispatchLevel		Normal	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	ResponsePlanType	0	1	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Priority_Description		Emergency		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Priority_Number	0	1		Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:24	Incident_Type		1 DEPUTY	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:44:32	Read Call	False	True	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:44:34	Caller_Name	VERIZON	BRENT CLICK	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:45:27	Address	292-299 Saluda Dam Rd	STANLEY/ Saluda Dam Rd	Address Change	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Address	292-299 Saluda Dam Rd	STANLEY DR / SALUDA DAM RD	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Latitude	0	34856523	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Longitude	0	82474571	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Street_Id	371480	371481	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248

7/2/2024	14:55:48	C28SO	Reassign Response	PETE HOLLIS BLVD\ALEXANDER ST	ReAssign Reason: REA_Reassigned	SO1248
7/2/2024	14:55:48	C28SO	Reassign Response	PETE HOLLIS BLVD\ALEXANDER ST	Clearing Primary Vehicle Flag	SO1248
7/2/2024	14:57:46		Incident Late		Active incident marked as late	
7/2/2024	15:10:11	E58SO	Disposition	SCDMV on Saluda Dam Rd	08_Another Agency	SO1248
7/2/2024	15:10:11	E58SO	Available	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]	Unit Cleared From Incident SO240702-109389	SO1248
7/2/2024	15:10:11		Incident Timer Clear	15 SALUDA DAM RD	Incident Late Timer cleared for SO240702-109389	SO1248
7/2/2024	15:10:11	E58SO	Response Closed	SCDMV on Saluda Dam Rd	Response Disposition: 08_Another Agency	SO1248

Edit Log

Date	Time	Field	Changed From	Changed To	Reason	Table	Workstation	User
7/2/2024	14:41:43	Agency Name		SHERIFF	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:41:43	Call Back Phone		843-340-3965	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:41:44	Address	(Blank)	34° 51'23.48"N / 082° 28'28.46"W	New Entry	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:44	Call_Back_Phone		843-340-3965	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Longitude	0	82474571	Entry Selected/Returned from Geolocator	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Latitude	0	34856523	Entry Selected/Returned from Geolocator	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	City		(C) GREENVILLE	Updated City	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Address	34° 51'23.48"N / 082° 28'28.46"W	292-299 SALUDA DAM RD	Entry Selected/Returned from Geolocator	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	ResponsePlanType	0	0	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Response_Area		SO8B	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334

ALL CONCRETE TO BE 3,000 PSI IV.

EXC

PROVIDE POSITIVE DRAINAGE AWAY FROM THE
RETAINING WALL DURING CONSTRUCTION AND
PERMANENTLY.

DO NOT OPERATE ANY HEAVY EQUIPMENT NEAR
THE RETAINING WALL.

NO SURCHARGE LOAD OR UPSLOPE INCLINE OF
BACKFILL WITHIN 10 FEET OF WALL.

10'-0"

Backfill with 57
min 2' bolind w

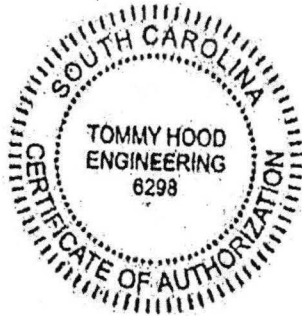
FRENCH DRAI

Compacted grave

each concrete
with two inter
each block

10' RET
SCALE:

Wall detail co
wall up to 10'



ELLECTRONICALLY FILED - 2023 JAN 16 10 56 AM - PUBLIC ACCESS - COMMONWEALTH OF MASSACHUSETTS - CONSTRUCTION PRACTICE #202301022855

29

Speaker 1 [Brent Click] - 911 Brent Click
Speaker 2 [911 Operator] - 911 operator

00:04:01 Speaker 1 [Brent Click]

Let's meet him at Greenville. Let's let's meet at Saluda Dam and White Horse. Right there at the DMV.

00:04:16 Speaker 2 [911 Operator]

OK.

00:04:30 Speaker 2 [911 Operator]

OK. What kind of car are you driving.

00:04:32 Speaker 1 [Brent Click]

I am on a motorcycle.

Speaker 2 [911 Operator]

Are you on a motorcycle?

Speaker 1 [Brent Click]

Yeah. That's why I smell like gunpowder right now. Because he was that close to me.

00:04:42 Speaker 2 [911 Operator]

7/2/2024	14:55:48	C28SO	Reassign Response	PETE HOLLIS BLVD\ALEXANDER ST	ReAssign Reason: REA_Reassigned	SO1248
7/2/2024	14:55:48	C28SO	Reassign Response	PETE HOLLIS BLVD\ALEXANDER ST	Clearing Primary Vehicle Flag	SO1248
7/2/2024	14:57:46		Incident Late		Active incident marked as late	
7/2/2024	15:10:11	E58SO	Disposition	SCDMV on Saluda Dam Rd	08_Another Agency	SO1248
7/2/2024	15:10:11	E58SO	Available	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]	Unit Cleared From Incident SO240702-109389	SO1248
7/2/2024	15:10:11		Incident Timer Clear	15 SALUDA DAM RD	Incident Late Timer cleared for SO240702-109389	SO1248
7/2/2024	15:10:11	E58SO	Response Closed	SCDMV on Saluda Dam Rd	Response Disposition: 08_Another Agency	SO1248

Edit Log

Date	Time	Field	Changed From	Changed To	Reason	Table	Workstation	User
7/2/2024	14:41:43	Agency Name		SHERIFF	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:41:43	Call Back Phone		843-340-3965	(Response Viewer)	Incident	SHERIFF09B	SO2334
7/2/2024	14:41:44	Address	(Blank)	34° 51'23.48"N / 082° 28'28.46"W	New Entry	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:44	Call_Back_Phone		843-340-3965	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Longitude	0	82474571	Entry Selected/Returned from Geolocator	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Latitude	0	34856523	Entry Selected/Returned from Geolocator	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	City		(C) GREENVILLE	Updated City	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Address	34° 51'23.48"N / 082° 28'28.46"W	292-299 SALUDA DAM RD	Entry Selected/Returned from Geolocator	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	ResponsePlanType	0	0	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334
7/2/2024	14:41:58	Response_Area		SO8B	(Response Viewer)	Response_Master_Incident	SHERIFF09B	SO2334

No Transport Priority Changes

Alarm Level Changes

No Alarm Level Changes

Activity Log

Date	Time	Unit	Activity	Location	Log Entry	User
7/2/2024	14:42:14		Problem Nature		Incident problem nature changed from <Blank> to 49B_Discharging Weapon~SO	SO2334
7/2/2024	14:44:23		Incident in Waiting Queue			
7/2/2024	14:44:23		ANI/ALI Statistics		INT Insert:Jul 02 2024 14:41:44 / INT SendNP:Jul 02 2024 14:41:43 / WS RecvNP:Jul 02 2024 14:41:43 / WS Process:Jul 02 2024 14:44:23	SO2334
7/2/2024	14:44:23		Waiting Pending Incident Time Warning		Waiting Pending Incident Time Warning timer expired	
7/2/2024	14:44:32		Read Incident		Incident 362 was Marked as Read.	SO1248
7/2/2024	14:45:23		Remove Waiting Pending Incident Warning		Removing Waiting Pending Incident Time Warning timer expired	
7/2/2024	14:45:23		Pending Incident Time Warning		Pending Incident Time Warning timer expired	
7/2/2024	14:45:23		Incident Late			
7/2/2024	14:48:10		Incident Timer Clear	STANLEY DR / SALUDA DAM RD	Incident Late Timer cleared for SO240702-109389	SO1248
7/2/2024	14:48:10	C28SO	Dispatched	W STONE AVE\WILTON ST		SO1248
7/2/2024	14:48:15	C28SO	Enroute	STANLEY DR / SALUDA DAM RD	Responding From = W STONE AVE\WILTON ST.	SO1248
7/2/2024	14:50:52	E58SO	Dispatched	PENDLETON ST\TRACTION ST		SO1248
7/2/2024	14:50:52	E58SO	Enroute	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]	Responding From = PENDLETON ST\TRACTION ST.	SO1248
7/2/2024	14:50:52	C28SO	Unit Backed up	W STONE AVE\WILTON ST	Backed up with E58SO	SO1248
7/2/2024	14:55:46	E58SO	At Scene	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]		SO1248
7/2/2024	14:55:48	C28SO	Available	15 SALUDA DAM RD [SCDMV on Saluda Dam Rd]	Unit Cleared From incident SO240702-109389	SO1248
7/2/2024	14:55:48	C28SO	Reassign Vehicle	PETE HOLLIS BLVD\ALEXANDER ST	ReAssign Reason: REA_Reassigned	SO1248

00:01:03 Speaker 1 [Brent Click]

It is.

00:01:05 Speaker 1 [Brent Click]

P7 *** something over it. I got a picture of the vehicle.

00:01:14 Speaker 1 [Brent Click]

The guy tried like running me down and then.

00:01:18 Speaker 1 [Brent Click]

When I went the other lanes, so he could pass me and when he went by, he shot at me twice.

00:01:27 Speaker 2 [911 Operator]

Can you give me a description of the vehicle?

00:01:29 Speaker 1 [Brent Click]

It is a red. It is a red Dodge Durango like a 2009, 2010 one of those years and it is has like Chrome steel wheels it. I didn't see the driver because I was kind of worried about traffic and but I heard the gunshots and saw the gun and.

00:01:29 Speaker 2 [911 Operator]

[inaudible].

00:01:49 Speaker 1 [Brent Click]

Yeah, the South Carolina tag. It's like one of the specialty tags with like a T711 and there's something covering the rest of it, but.

00:01:58 Speaker 1 [Brent Click]

Yeah.

00:02:02 Speaker 2 [911 Operator]

OK. All right. So.

00:02:06 Speaker 2 [911 Operator]

7/2/2024	14:45:35	IntersectionStreetID	NULL	371990	Viewer) (Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Cross_Street	DEBORAH LN/STANLEY DR		(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Address	STANLEY/ Saluda Dam Rd	STANLEY DR / SALUDA DAM RD	Change Verified	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:45:35	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF04B	SO1248
7/2/2024	14:48:54	Address	STANLEY DR / SALUDA DAM RD	15 SALUDA DAM RD	Address Change	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Address	STANLEY DR / SALUDA DAM RD	15 SALUDA DAM RD	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Latitude	34856523	34857032	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Longitude	82474571	82463065	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	PremiseId	NULL	29272	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Street_id	371481	1058462	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	IntersectionStreetID	371990	NULL	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Location_Name		SCDMV on Saluda Dam Rd	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Cross_Street		WHITE HORSE RD/BROADWAY DR	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Location_Type		Government Building	(Response Viewer)	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:56	Address	15 SALUDA DAM RD	15 SALUDA DAM RD	Premise Verified	Response_Master_Incident	SHERIFF04B	SO1248
7/2/2024	14:48:57	Fire Dist		BEREA FIRE DISTRICT	(Response Viewer)	Incident	SHERIFF04B	SO1248

Custom Time Stamps

No Custom Time Stamps

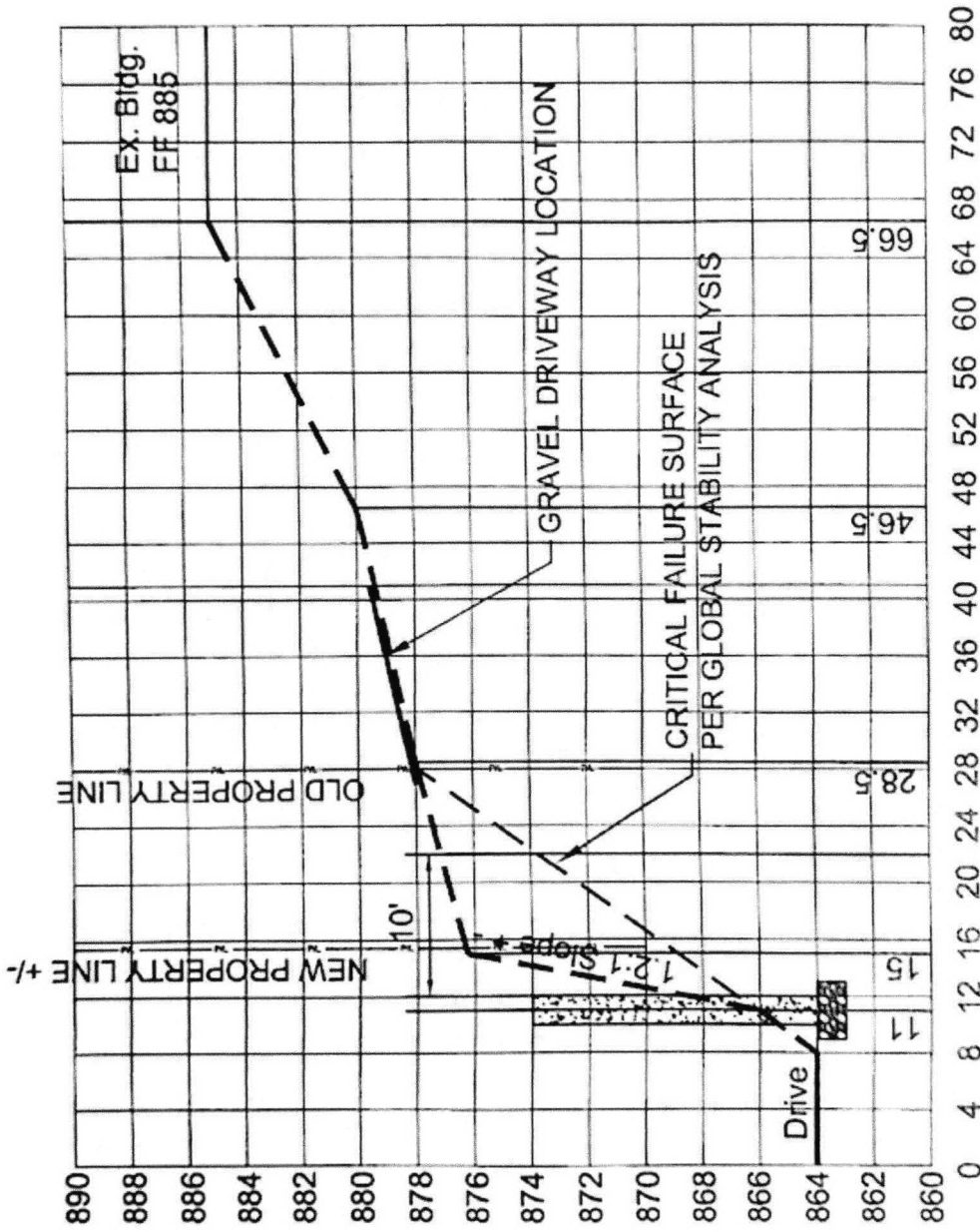
Custom Data Fields

Description

FireDist
FireDist
FireDist

Data
BEREA FIRE DISTRICT
BEREA FIRE DISTRICT
BEREA FIRE DISTRICT

User
SO1248
SO1248
SO2334



Section A-A

SCALE VERT. 1" = 5'
 HOR. 1" = 10'

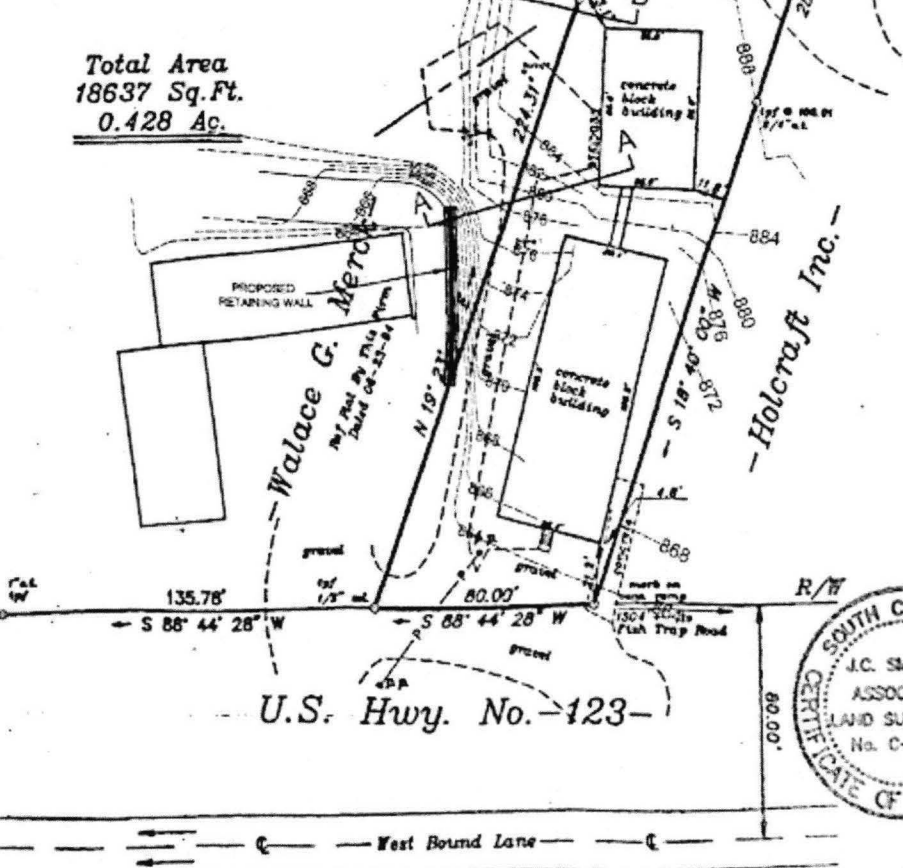
He shall stand of the latter day upon the earth

PICKENS CO.
REGISTER OF DEEDS
500 Smith
98 APR 21 PM 12:12



Frank R. Garrison Estate
N 50° 45' 38" E - 112.45'

Total Area
18637 Sq. Ft.
0.428 Ac.



Holcraft Inc.



NOTE: THE RIGHTS OF WAY INFORMATION WAS OBTAINED BY PHONE CONVERSATIONS WITH SCOTT & PICKENS COUNTY OF WHICH DOCUMENTATION WAS NOT RECEIVED BY THIS FIRM FOR DOCUMENTATION, CONTACT THE PICKENS COUNTY OFFICE OF THE S.C.D.A.
REFERENCE IS HEREBY MADE TO A PLAT BY THIS FIRM DATED MAY 20, 1996.
ALSO, SEE DEED BOOKS 12-C PG. 91 AND 12-W PG. 44L AND PLATS FOR JOHN COBB BY THIS FIRM DATED 11-29-88 AND 11-01-91.
ACRES & PROPERTY ARE SUBJECT TO ANY AND ALL RIGHTS OF WAY AND EASEMENTS OF RECORD OR ON THE GROUND.

Boundary Survey for

SINCE 1909
SMITH
J.C. Smith & Associates

County Pickens
South Carolina

I HEREBY STATE THIS TO THE BEST OF MY KNOWLEDGE.

01593

CONSTRUCTION NOTES:

WALLS ARE DESIGNED FOR 2,000 PSF BEARING CAPACITY. ALL FOOTINGS SHALL BEAR ON ORIGINAL, UNDISTURBED SOIL, IF POSSIBLE. ALL STRUCTURAL FILL SHALL BE TESTED BY A GEOTECHNICAL ENGINEER AND MUST REACH 95% COMPACTION FOR EACH LIFT.

ALL CONCRETE TO BE 3,000 PSI NW.

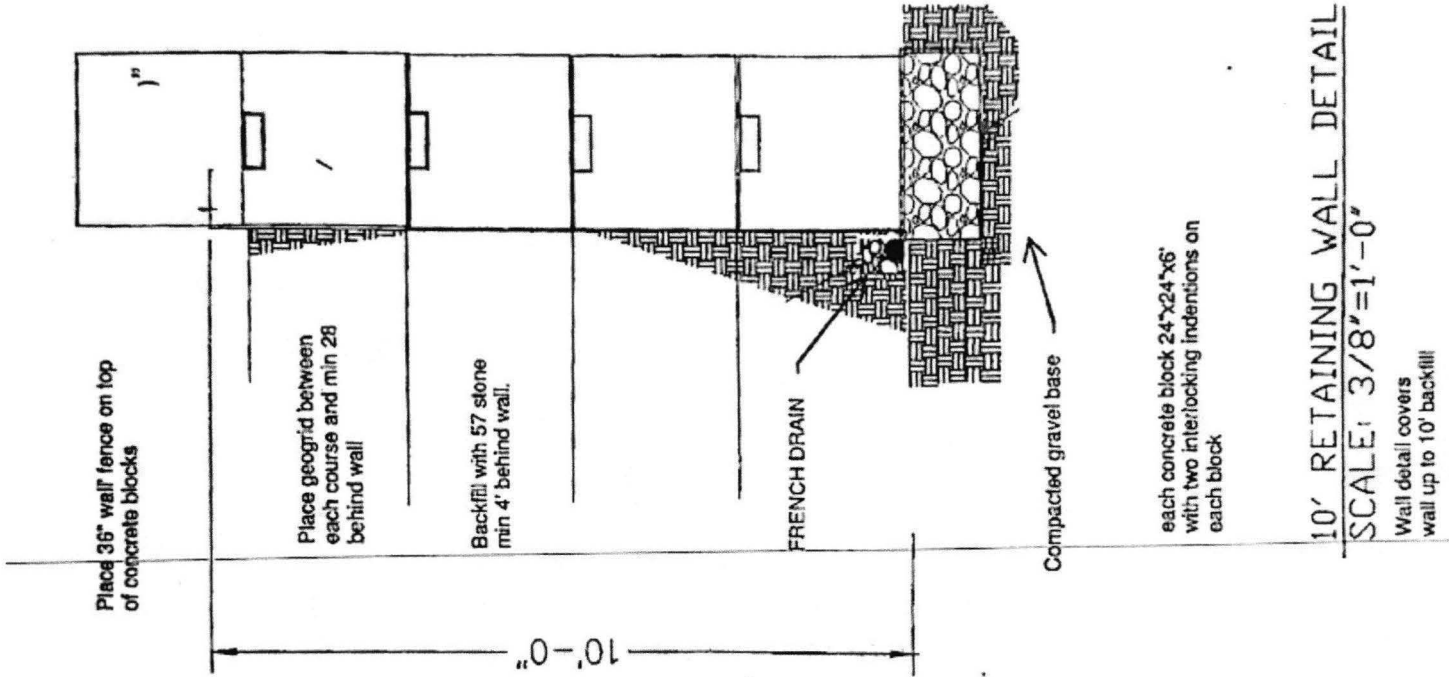
PROVIDE POSITIVE DRAINAGE AWAY FROM THE RETAINING WALL DURING CONSTRUCTION AND PERMANENTLY.

DO NOT OPERATE ANY HEAVY EQUIPMENT NEAR THE RETAINING WALL.

NO SURCHARGE LOAD OR UPSLOPE INCLINE OF BACKFILL WITHIN 10 FEET OF WALL.



01594



10' RETAINING WALL DETAIL
SCALE: 3/8"=1'-0"

Wall detail covers wall up to 10' backfill



3670 Calhoun Mem Hwy, Easley, SC 29611

INSTRUCTION NOTES.

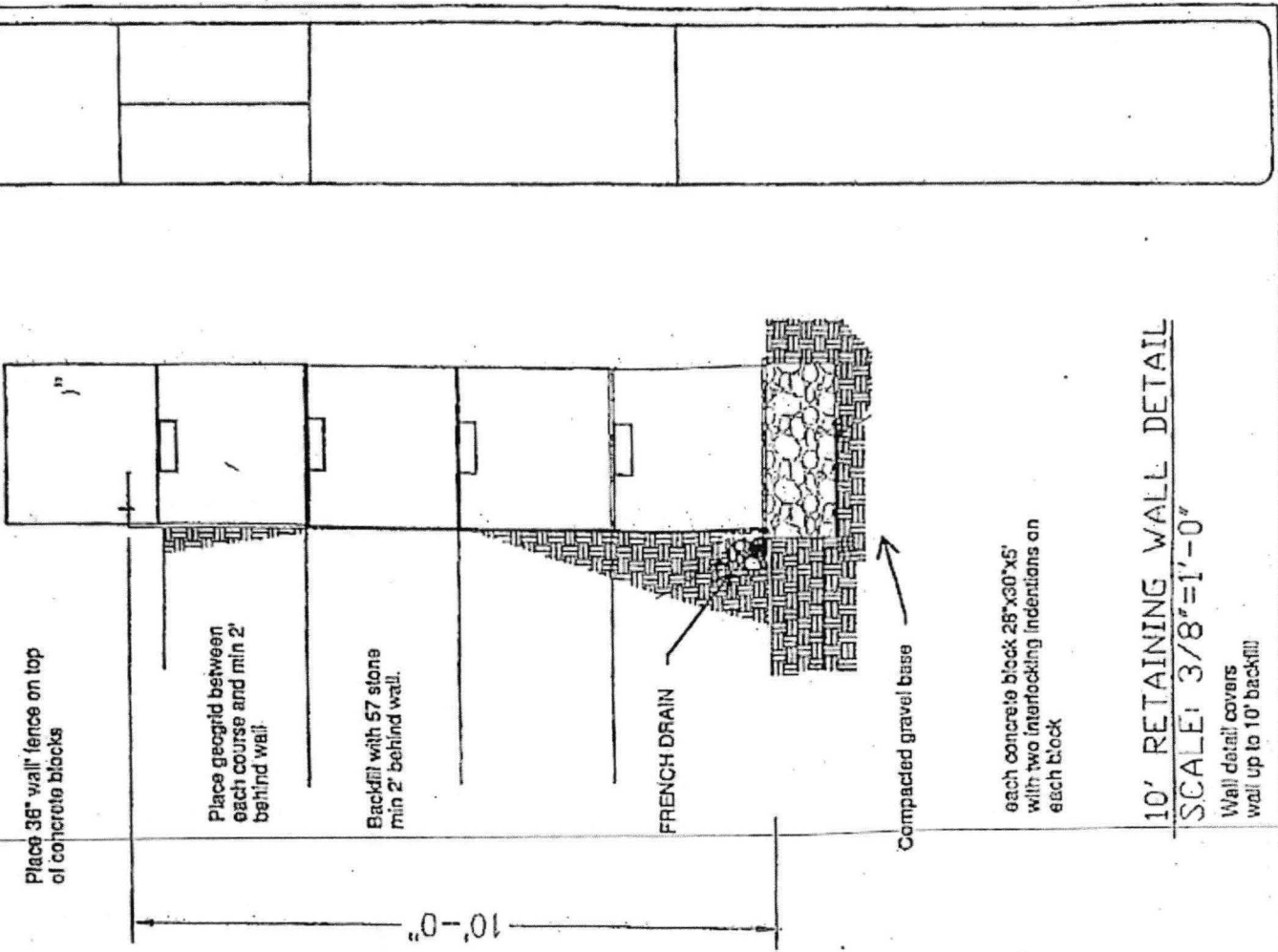
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SCALE: 3/8"=1'-0"

Wall detail covers wall up to 10' backfill



PICKENS COUNTY

SOUTH CAROLINA



COMMUNITY DEVELOPMENT

BUILDING CODES ADMINISTRATION • STORMWATER MANAGEMENT • PLANNING

General Building Construction Permit Application

Property Information

TMS# 5059-13-14-4247 Parcel, Lot/Site Address 3670 Calhoun Memorial Hwy Subdivision _____ Lot Number _____
 Property Owner's Name(s) Thomas SC Properties, LLC
 Property Owner Mailing Address: 3670 Calhoun Memorial Hwy City Greenville State SC Zip 29611
 Property Owner Phone# 864-982-1996 Property Owner Email Alltech.thomas@gmail.com

Contractor Information

Is your project being constructed under the owner/builder exemption? Yes
 If yes, you must provide a completed and recorded Owner/Builder Disclosure Form

Name Gunter Custom Builders DBA Gunter Custom Builders SC License # CLB-122542
 Mailing Address 123 Brentwood Dr City Piedmont State SC Zip 29673
 Phone# 864-422-2005 Email gunterbuilders@yahoo.com Registered CSS User? Yes No
 If you are not a registered CSS user, please consider registering. All permit applications and inspection requests can be made via our Citizen Self Service Portal.
 Visit www.co.pickens.sc.us/permits for more information.

Project Information and Permit/Project Type of Work

- Residential:** New Single Family New Duplex Accessory Structure Addition Alteration/Remodel Deck Demolition Fence
 Modular Home Moving (not manufactured home) Repair Retaining Wall Above Ground Pool In-Ground Pool
- Commercial:** New Construction Multi-Family Accessory Structure Addition Alteration/Remodel Building Shell Only Demolition Fence
 Foundation Only Repair Retaining Wall Roof Above Ground Pool In-Ground Pool

Work Description: Build 720 Sq Ft Retaining wall per Engineer Drawing

Project Valuation/Contract/Cost of Work: \$15000

Total Heated Sq. Ft.: _____ Total Unheated Sq. Ft.: _____ Porches/Decks Sq. ft.: _____ Garage/Utility/Misc. Sq. Ft.: _____

Main Floor Sq. Ft.: _____ 2nd Floor Sq. Ft.: _____ 3rd Floor sq. Ft.: _____ Addl. Floor Sq. Ft.: _____

Bonus Room Sq. Ft.: _____ Finished Basement Sq. Ft.: _____ Unfinished Basement Sq. Ft.: _____

Bedrooms: _____ # Bathrooms: _____ # Fireplaces: _____

Electrical Provider: _____ SCDHEC Septic Tank Permit #: _____

Signature of Contractor / Owner: [Signature]

Date: 11-15-23

ELECTRONICALLY FILED - 2024 Feb 14 3:26 PM - PICKENS - COMMON PLEAS - CASE#2020CP3900266

3670 Calhoun Mem Hwy, Easley, SC 29611

CONSTRUCTION NOTES:

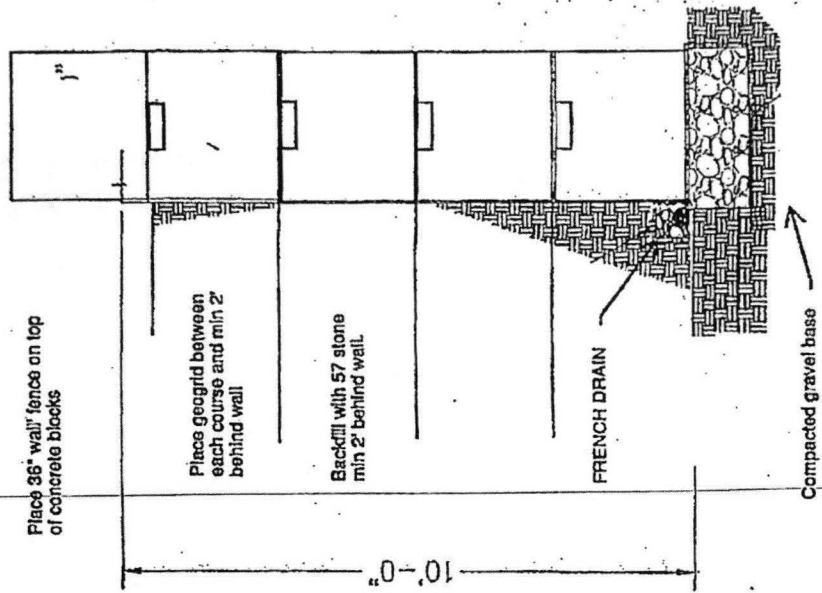
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ALL CONCRETE TO BE 3,000 PSI NW.

PROVIDE POSITIVE DRAINAGE AWAY FROM THE RETAINING WALL DURING CONSTRUCTION AND PERMANENTLY.

DO NOT OPERATE ANY HEAVY EQUIPMENT NEAR THE RETAINING WALL.

NO SURCHARGE LOAD OR UPSLOPE INCLINE OF BACKFILL WITHIN 10 FEET OF WALL.



each concrete block 28"x30"x5'
with two interlocking indentions on each block

10' RETAINING WALL DETAIL
SCALE: 3/8"=1'-0"

Wall detail covers wall up to 10' backfill



Pickens County Department of
Community Development
222 McDaniel Avenue, B-10
Pickens, SC 29671

Permit NO: BC-23-0116
Permit Type: Building Commercial
Work Classification: Retaining Wall
Permit Status: Issued
Issue Date: 11/15/2023
Expiration: 05/13/2024

Location Address: 3670 CALHOUN MEM HWY, GREENVILLE, SC
Parcel Number: 5059-13-14-4247

Contacts

Thomas SC Properties LLC 3670 CALHOUN MEM HWY, GREENVILLE, SC (864)982-1996 AllTechThomas@gmail.com	Owner	Randall Gunton 123 Bentwood DR, Piedmont, SC 29673 (864)422-0005	Contractor	guntonbuilders@yahoo.com
--	-------	--	------------	--------------------------

Description: _____ Valuation: \$15,000.00
Total Sq Feet: 0.00
Inspection Requests: (864) 898-5950

Fees	Amount
Building Permit Fee (Commercial)	\$85.00
Total:	\$85.00

Payments	Amnt Paid
Total Fees	\$85.00
Check # 4904	\$85.00
Amount Due:	\$0.00

Inspections:	Inspection Type
	Footing
	Framing
	Final Building
	Final Planning
	Final Building Stormwater

By receipt of this permit, I hereby certify that the statements in this application are true and correct and that the property owner has given permission for this work to proceed. I further certify that all provisions of laws, ordinances, and setbacks governing this type of work will be complied with whether specified herein or not.
It is a violation of the codes to move in before you receive a Certificate of Occupancy.

Unless otherwise noted, setbacks are: Front - 20 Feet, Side - 7 Feet, and Rear - 10 Feet. Setbacks are to be measured from the property line, not from adjacent roadway.

Additional Information

Contractor Valuation/Cost to Build :: 15000.00
Front Setback: 20 Feet
Side Setback: 7 Feet
Rear Setback: 10 Feet

November 15, 2023
Issued By: _____ Date

ELECTRONICALLY FILED - 2024 10 15 10:03 AM



WALLS ARE DESIGNED FOR 2,000 PSF BEARING CAPACITY. ALL FOOTINGS SHALL BEAR ON ORIGINAL, UNDISTURBED SOIL, IF POSSIBLE. ALL STRUCTURAL FILL SHALL BE TESTED BY A GEOTECHNICAL ENGINEER AND MUST REACH 95% COMPACTION FOR EACH LIFT.

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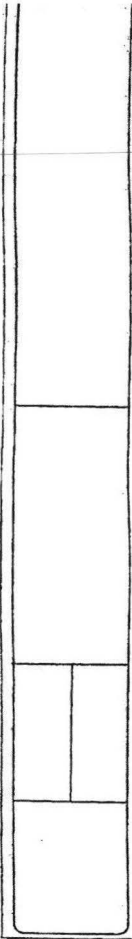
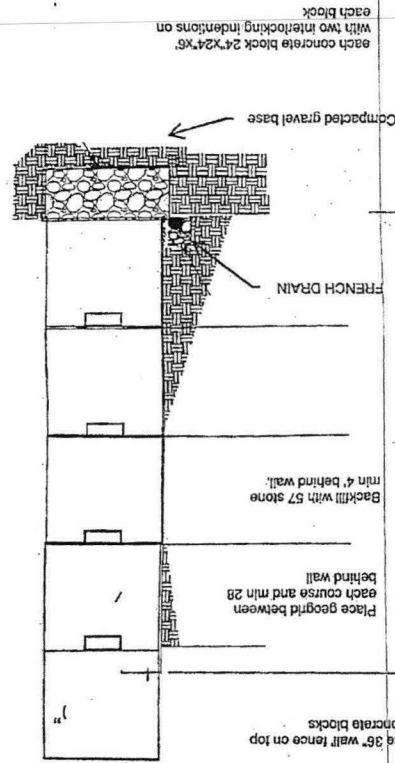
DO NOT OPERATE ANY HEAVY EQUIPMENT NEAR THE RETAINING WALL.

NO SURCHARGE LOAD OR UPSLOPE INCLINE OF BACKFILL WITHIN 10 FEET OF WALL.

CONSTRUCTION NOTES:

3670 Calhoun Mem Hwy, Easley, SC 29611

TO RETAINING WALL DETAIL
SCALE: 3/8"=1'-0"



[Print this page](#)

Board: Commercial Contractors

GUNTON CUSTOM BUILDERS LLC
123 BENTWOOD DRIVE
PIEDMONT, SC 29673
(864)422-0005

License number: 122542
License type: GENERAL CONTRACTOR
Status: ACTIVE
Expiration: 10/31/2024
First Issuance Date: 11/23/2019
Classification:
Building-BD2

Qualified By: Financial Statement
President / Owner: RANDALL GUNTON

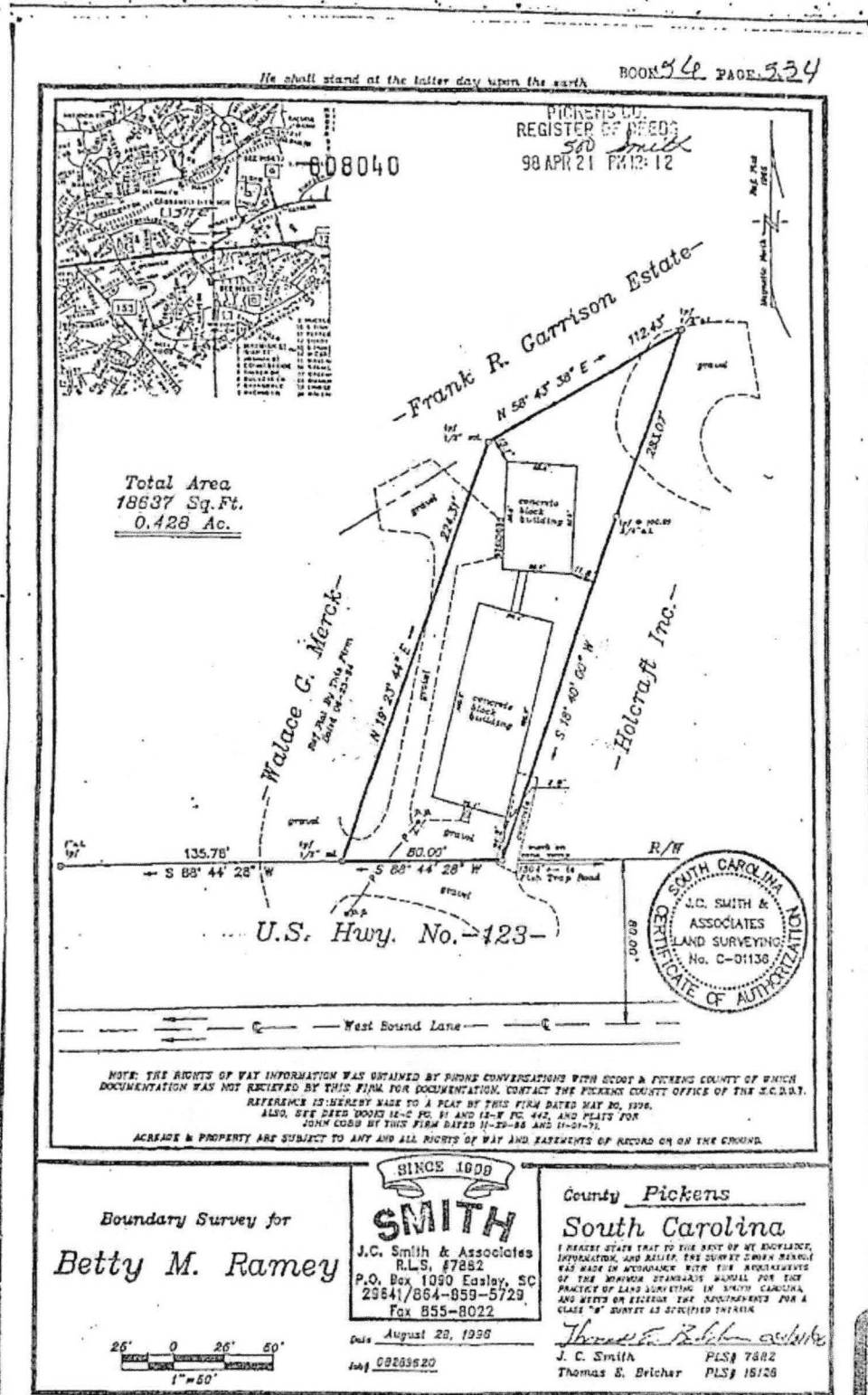
[Click here for Classification definitions and licensee's contract dollar limit](#)

Supervised By
GUNTON RANDALL (COG)

[File a Complaint against this licensee](#)

Board Public Action History:

[View Orders](#) [View Other License for this Person](#)
[No Orders Found](#)



PLAINTIFF'S EXHIBIT 8

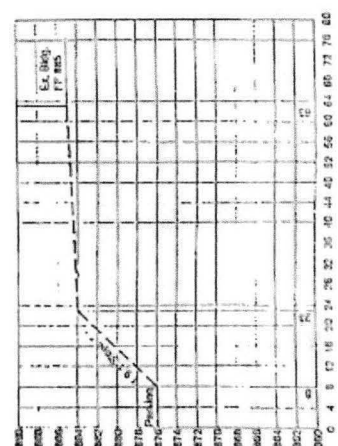
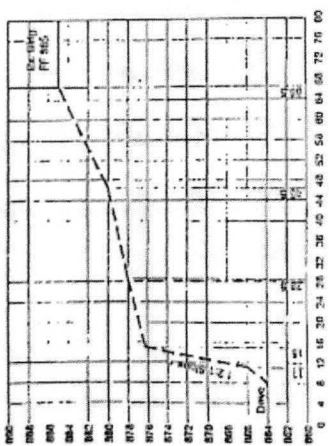
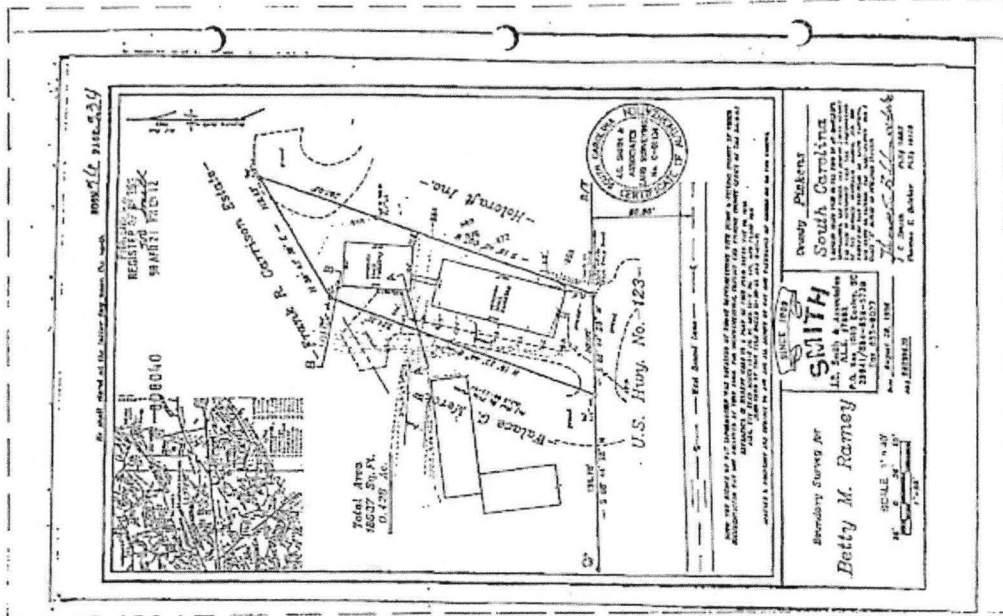
PL 49 01602

B

PLAINTIFF'S EXHIBIT 42

S-1

P. 105





PICKENS COUNTY

SOUTH CAROLINA



COMMUNITY DEVELOPMENT

BUILDING CODES ADMINISTRATION • STORMWATER MANAGEMENT • PLANNING

General Building Construction Permit Application BC-23-0114

Property Information

TMS# 5059-13-14-4247 Parcel/Lot/Site Address 3670 Calhoun Memorial Hwy Subdivision _____ Lot Number _____

Property Owner's Name(s) Thomas SC Properties, LLC

Property Owner Mailing Address: 3670 Calhoun Memorial Hwy City Greenville State SC Zip 29617

Property Owner Phone# 864-982-1996 Property Owner Email Alltech.thomas@gmail.com

Contractor Information

Is your project being constructed under the owner/builder exemption? Yes
If yes, you must provide a completed and recorded Owner/Builder Disclosure Form

Name Gunter Custom Builders DBA Gunter Custom Builders SC License # CL6-122542

Mailing Address 123 Bentonwood Dr City Piedmont State SC Zip 29673

Phone# 864-422-0005 Email gunterbuilders@yahoo.com Registered CSS User? Yes, No

If you are not a registered CSS user, please consider registering. All permit applications and inspection requests can be made via our Citizen Self Service Portal.
Visit www.co.pickens.sc.us/permitting for more information.

Project Information and Permit/Project Type of Work

Residential: New Single Family New Duplex Accessory Structure Addition Alteration/Remodel Deck Demolition Fence

Modular Home Moving (incl manufactured home) Repair Retaining Wall Above Ground Pool In-Ground Pool

Commercial: New Construction Multi-Family Accessory Structure Addition Alteration/Remodel Building Shell Only Demolition Fence

Foundation Only Repair Retaining Wall Roof Above Ground Pool In-Ground Pool

Work Description: Build 720 Sq Ft Retaining wall per Engineer Drawing

Project Valuation/Contract/Cost of Work: \$15000

Total Heated Sq. Ft.: _____ Total Unheated Sq. Ft.: _____ Porches/Decks Sq. ft.: _____ Garage/Utility/Misc. Sq. Ft.: _____

Main Floor Sq. Ft.: _____ 2nd Floor Sq. Ft.: _____ 3rd Floor sq. Ft.: _____ Addl. Floor Sq. Ft.: _____

Bonus Room Sq. Ft.: _____ Finished Basement Sq. Ft.: _____ Unfinished Basement Sq. Ft.: _____

Bedrooms: _____ # Bathrooms: _____ # Fireplaces: _____

Electrical Provider: _____ SCDHEC Septic Tank Permit #: _____

Signature of Contractor / Owner: [Signature] Date: 2-15-23

01604

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Pickens
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2020CP3900266

Click Properties, Llc et al
PLAINTIFF(S)

Thomas Sc Properties Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled);
 Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

IN REGARDS TO THE JURY TRIAL THAT CONCLUDED MAY 26, 2022 WITH A JURY VERDICT IN FAVOR OF THE PLAINTIFF ON VARIOUS CAUSES OF ACTION, ALL POST TRIAL MOTIONS WILL NEED TO BE FILED BY WITHIN 10 DAYS OF THE VERDICT. IT IS SO ORDERED.

ORDER INFORMATION

This order ends does not end the case. See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 06/03/2022 .

NAMES OF TRADITIONAL FILERS SERVED BY MAIL