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Sep 18 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jessica A. Savini, Circuit Court Judge

Appellate Case No.: 2024-002176
Circuit Case No.: 2023-CP-10-00305

JOHN NICK,

Respondent,

v.

EMILY PRIOLEAU,

Appellant.

**RESPONDENT'S RESPONSE AND RETURN TO APPELLANT'S EMERGENCY
MOTION TO COMPEL RESPONDENT'S PAYMENT OF PROPERT TAX AND STAY
CHARLESTON COUNTY TAX SALE**

The Respondent, John Nick, by his undersigned attorney, hereby files this Response and Return to the "Emergency Motion to Compel Plaintiff to Pay Delinquent Taxes and Stay Tax Sale Pending Appeal," dated September 16, 2025.

It has been Respondent's continuous and consistent position contention that he is the sole owner of the property known as 5528 Flanders Avenue, North Charleston, S.C. 29406, which is titled in Respondent's name. Respondent has been paying the real property taxes on the subject property relevant to this appeal since 2022.

Respondent is further aware of the noticed December 8, 2025 Charleston County Tax Sale. It is Respondent's intention to pay said real property taxes on his property in advance of the date of tax sale. Upon payment, Respondent will submit a further Memorandum showing proof of payment. Upon such event, Respondent respectfully submits that Appellant's instant Motion will be moot and should be denied.

Dated: Mount Pleasant, S.C.
September 17, 2025

Respectfully submitted,

s/William B. Jung, Esq.
1156 Bowman Road, Ste. 200
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(843) 576-4200
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S.C. Bar No. 00688788

Attorney for Respondent John Nick

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PROOF OF SERVICE

I, William B. Jung, Esq., certify under penalty of perjury that on September 18, 2025, I served a copy of the Respondent's Return/Response to Emergency Motion to Stay Tax Sale by emailing and mailing a true and complete copy thereof the Appellant:

Ms. Emily Prioleau
5528 Flanders Avenue
North Charleston, S.C. 29406
eprioleau1976@gmail.com

Dated: September 18, 2025

s/William B. Jung, Esq.
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Attorney for Respondent John Nick