

STATE OF SOUTH CAROLINA

COUNTY OF MorryVictoria Jay Stevens

Plaintiff(s)

vs.

Charles Ard & Wilbur Carson

Defendant(s)

Submitted By: Victoria Jay StevensAddress: 4311 Bryant St. Morris SC 29569

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2022CP-26-04125

SC Bar #: _____

Telephone #: 252-516-1541

Fax #: _____

Other: _____

E-mail: _____

RECEIVED

OCT 01 2025

CC Court of Appeals

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.
- ☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☐ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☐ This case is exempt from ADR. (Certificate Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|--|--|---|---|
| Contracts
☒ Constructions (100)
☐ Debt Collection (110)
☐ General (130)
☐ Breach of Contract (140)
☐ Fraud/Bad Faith (150)
☐ Failure to Deliver/Warranty (160)
☐ Employment Discrim (170)
☐ Employment (180)
☐ Other (199) _____
Inmate Petitions
☐ PCR (500)
☐ Mandamus (520)
☐ Habeas Corpus (530)
☐ Other (599) _____ | Torts - Professional Malpractice
☐ Dental Malpractice (200)
☐ Legal Malpractice (210)
☐ Medical Malpractice (220)
Previous Notice of Intent Case #
20 ____ -NI- ____
☐ Notice/ File Med Mal (230)
☐ Other (299) _____
Administrative Law/Relief
☐ Reinstate Drv. License (800)
☐ Judicial Review (810)
☐ Relief (820)
☐ Permanent Injunction (830)
☐ Forfeiture-Petition (840)
☐ Forfeiture-Consent Order (850)
☐ Other (899) _____
Special/Complex /Other
☐ Environmental (600)
☐ Automobile Arb. (610)
☐ Medical (620)
☐ Other (699) _____
☐ Sexual Predator (510)
☐ Permanent Restraining Order (680)
☐ Interpleader (690) | Torts - Personal Injury
☐ Conversion (310)
☐ Motor Vehicle Accident (320)
☐ Premises Liability (330)
☐ Products Liability (340)
☐ Personal Injury (350)
☐ Wrongful Death (360)
☐ Assault/Battery (370)
☐ Slander/Libel (380)
☐ Other (399) _____
Judgments/Settlements
☐ Death Settlement (700)
☐ Foreign Judgment (710)
☐ Magistrate's Judgment (720)
☐ Minor Settlement (730)
☐ Transcript Judgment (740)
☐ Lis Pendens (750)
☐ Transfer of Structured Settlement Payment Rights Application (760)
☐ Confession of Judgment (770)
☐ Petition for Workers Compensation Settlement Approval (780)
☐ Incapacitated Adult Settlement (790)
☐ Other (799) _____ | Real Property
☐ Claim & Delivery (400)
☐ Condemnation (410)
☐ Foreclosure (420)
☐ Mechanic's Lien (430)
☐ Partition (440)
☐ Possession (450)
☐ Building Code Violation (460)
☐ Other (499) _____
Appeals
☐ Arbitration (900)
☐ Magistrate-Civil (910)
☐ Magistrate-Criminal (920)
☐ Municipal (930)
☐ Probate Court (940)
☐ SCDOT (950)
☐ Worker's Comp (960)
☐ Zoning Board (970)
☐ Public Service Comm. (990)
☐ Employment Security Comm (991)
☐ Other (999) _____ |
|--|--|---|---|

Submitting Party Signature: Victoria Jay StevensDate: 6/27/2021

PAID

STATE OF SOUTH CAROLINA,
COUNTY OF

IN THE COURT OF COMMON PLEAS

SUMMONS

Victoria Joy Stephens

Plaintiff,

VS.

Charles Ard & Wilbur Garsy

Defendant.

FILE NO.

2022CP26204125

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

, South Carolina

Victoria Joy Stephens
Plaintiff Attorney for Plaintiff

Dated:

Address:

FILED
HORRY COUNTY
2022 JUN 27 P 2:26
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

202206041120

6/25/22

The proof of what I paid for a Graceland shed to be constructed as a bathroom is in canceled checks, between April 4, 2022 and May 5, 2022. Said checks total \$22,850.00. Over 3 times what the Graceland Shed worked on cost. I sought to add an additional bath to my home. Previously Mr. Ard and Mr. Causey developed a shed in my front yard, working from 7:30 am until 6pm. With my bath addition they never arrived before my yard worker, currently housed on my property, left for work at 8am. They left nearly daily before 3pm; rarely did they work a full week, often taking both Thursday and Friday off.

During this work on my bath addition Mr. Ard's conduct and words to me were not professional. This was exceedingly distressing as I gave Mr. Ard no reason for this type behavior. I always paid when asked. I conducted myself appropriately. On several occasions Mr. Ard phoned me at night just to talk, often saying things of a risqué nature. I several times reminded Mr. Ard he was married, and such was neither appreciated nor warranted. Why he chose to conduct himself in this manner baffled me. Never have we had any type of personal relationship. My familiarity with him has always been through his work; he worked several times for my Mother, and has completed several jobs such as a wheelchair ramp, and numerous repairs of holes in my floors. I cannot imagine why he decided to act this way. Was it necessary I remind him that he was a licensed professional? When he completed my deck and wheelchair ramp, even before, he was knowledgeable of my profound disability. Why would he imagine I would welcome this behavior? Enclosed please find:

Copies of canceled checks written to Mr. Charlie Ard
invoices given to me per Mr. Charlie Ard

Copies of reports per Loris building inspector

I feel rather stupid for not making Mr. Ard sign a legal agreement for the addition of this Graceland shed, and upgrades to make it a bathroom. Inasmuch as he and Mr. Causey had completed several jobs for me before, as well as the fact that I met you through Mr. Billy Gore/G&G Construction when the floors in Mother's house were replaced I felt contractual agreement not necessary. Although I may feel rather stupid, his receipts furnished for supplies, copies of canceled checks, and my conversations with Loris building inspector, and his report prove that Mr. Ard and Mr. Causey's work was rushed, over-priced, shoddy, not to code, and horribly unsafe. Mr Ard's words have been vulgar, and sexually aggressive. Admittedly, I laughed, tried to humor his diatribe, and squelch it, by not taking it seriously. His responses grew uglier and his words more vulgar. He chose to say I threatened him. I simply referred to him as "a Dirty old' Man": as well as told him that his actions were not those permitted by L.L.R.. Building codes address the accommodations provided an individual in my physical condition, they are, factually, Federal Law. I am so disheartened and sickened by his conduct, especially things that he told me the building inspector for Loris told him. He told me that the inspector told him one of the rails had to be removed so I could exit if a fire started. The building inspector for Loris, Mr. Jimmy Prince told me he had never talked to him regarding this job.

The second week of this job, I asked him to please install rails that helped me as I am disabled. He said yes. It was right after this his words turned to a sexually aggressive nature, and he said to me many

FILED
HARRY COUTY
2022 JUN 27 PM 2:22
RENEE H. EVANS
CLERK OF COURT
HARRY COUTY

times that he did not charge too much. He and Mr. Causey's presence, at my residence grew shorter, some days not at all. I inquired as to why, and he stated other work.

I paid promptly, and fully when asked. I met my responsibility in our verbal contract. I asked Mr. Ard, a week before he told me if I did not give him a thousand dollars up front that, he would not be back and I could kiss his a#@; would this cost me anymore? He said no. I hired he and Mr. Causey due to my disability and a replaced hip, I could hardly get into my present bathroom. He agreed to complete this job. I paid him all he asked for. While his work was, although not timely, good, or so I thought, his professionalism was totally absent.

I ask him to have this work completed. I am disabled, I cannot presently ambulate, and thus using a walker within my present bath is necessity. My walls and molding bear marks from this, and it is very dangerous. This is on the inspector's report, "1. Need 1 GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault beaker needed for all other outlets 4. No means of egress provided per R301.1 5. Need thermal expansion device needed on water heater 6. Need handrails on both sides of ramp." I ask that he correct these violations of code. I cannot use this bath for fear of electrocution. Also, and this is atrocious for any contractor; cigarette butts, bent nails, and refuse were left all over my driveway, and around the bath addition, I cleaned this up, although painful and extremely difficult. There is also the fact that when he installed the doors, bedroom door and bath door, I only received one key. Between his antagonism, sexual innuendos, and vulgar heated messages, I ask for funds to change these doorknobs as he, his work, his verbiage, and his response to my concerns, let me know my safety, well-being, and peace of mind are not his concerns. When he worked on the Shed in my front yard, I only received one key to that door, so I ask that be covered, too.

Mr. Ard has told me having a license, or not, had no bearing on his ability to work. Therefore copies of this letter and all checks, receipts, and the inspector's report are going to L.L.R. accompanied by a complaint form. Due to the monies I have spent, the hardship this has presented me, Mr. Ard's repeated vulgarities and refusal to speak to me, telling me his attorney says I have no case; I plan on seeking compensation in court as well. Mr. Wilbur Causey has, at no time, acted as Mr. Ard has, but he was present during much of this, and was party to what occurred.

Victoria J. [Signature] 6/27/22

RENEE H. ELVIS
CLERK OF COURT
Horry County, SC

2022 JUN 27 P 2:26

FILED
HORRY COUNTY

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 08-11-2022 11:53:36 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 08-11-2022 11:53:26 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Answer/Answer

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2022 Aug 11 11:56 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 08-11-2022 03:34:38 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 08-11-2022 03:34:31 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Affidavit/Affidavit of

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2022 Aug 11 3:37 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff,

vs.

Charles Ard and Wilbur Causey,

Defendant.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

DEFENDANTS' ANSWER

FILE NO.: 2022-CP-26-04125

The Defendants, Charles Ard and Wilbur Causey, by and through Their undersigned attorney, hereby makes Answer as follows:

FOR A FIRST DEFENSE
(General Denial)

1. Each and every allegation of the Plaintiff's Complaint not hereinafter admitted, qualified or explained is denied and strict proof demanded thereof.

FOR A SECOND DEFENSE
(Failure to State a Claim)

2. The Complaint fails to state facts sufficient to constitute a claim for relief and therefore, should be dismissed pursuant to Rule 12(b)(6), FRCP.

FOR A THIRD DEFENSE
(Failure to Mitigate Damages)

3. Plaintiff has a legal obligation to mitigate damages claimed, which are denied, and to the extent she failed to do so, her claims are barred, in whole or in part.

FOR A FOURTH DEFENSE
(Good Faith)

4. Defendants acted in good faith and in a reasonable manner and are therefore not liable for any of the injuries or harm alleged in the Complaint.

FOR A FIFTH DEFENSE
(Reservation)

5. Defendants reserve the right to assert, and do not waive, any additional or further defenses as may be revealed by information acquired during discovery or otherwise.

WHEREFORE, having fully responded to the Plaintiff's complaint, the Defendants pray that such Complaint be dismissed with prejudice, and that the relief sought by the Plaintiff be denied, that judgement be rendered in favor of the Defendants, that Plaintiff be assessed with all costs of this action, Defendants be awarded any fees and that Defendants have such and further relief as this Court may deem just and proper.

RIVERTOWN LAW

s/L. Bradley Smith
L. Bradley Smith, Esquire
SC Bar #73192
Attorney for Defendant, Charles Ard
Attorney for Defendant, Wilbur Causey
908 Fourth Avenue
Conway, South Carolina 29526
Phone: (843) 488-5600

August 11, 2022

****REMAINING PORTION LEFT INTENTIONALLY BLANK****

STATE OF SOUTH CAROLINA
COUNTY OF GEORGETOWN

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens,
Plaintiff,

AFFIDAVIT OF MAILING

vs.

Charles Ard and Wilbur Causey,
Defendants.

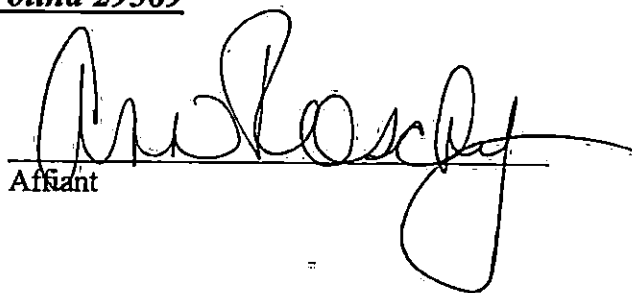
Docket No.: 2022-CP-22-04125

Personally appeared Ann Roschy, an employee of Rivertown Law and attorney L. Bradley Smith, attorney for the Defendant, who states she served the Plaintiff, Victoris Joy Stevens, with the Defendants' Answer along with the Affidavit of Mailing by mailing:

- ☒ First class mail and
- ☒ Certified mail
 - ☐ restricted delivery
 - ☒ return receipt requested

in the United States Mail, with proper postage attached and receipt attached (if applicable), on August 11, 2022 addressed as follows:

Victoria Joy Stevens
4311 Bryant Street
Longs, South Carolina 29569


Affiant

Sworn to before me this
11th day of August 2022.

Melissa Hersey
Notary Public of South Carolina
Printed Name: Melissa Hersey
My Commission expires: 03/28/2029

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF HORRY
FIFTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens,

Plaintiff

VS

PLAINTIFF'S REPLY TO THE DEFENDANT'S ANSWER AND COUNTERCLAIM

Charles Ard and Wilbur Causey,

Defendants

FILE NO.: 2022-CP;26-04125

FILED
HORRY COUNTY
RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC
2022 SEP -1 P 2:00

Monday, August 29, 2023

To: L. Bradley Smith, Esquire, Attorney for Defendants Charles Ard and Wilbur Causey:

This Plaintiff, Victoria Joy Stevens, responding to the Answer and Counterclaim of Defendants Charlie Ard and Wilbur Causey (hereinafter the "Defendants")' attorney.

1. As for your first defense, the proceedings are admitted in a letter, to the Defendants, that I supply. Said correspondence was also given to Clerk of Court. *It is qualified by failed inspection per the city of Loris, by Inspector Jimmy Prince. Within said correspondence, denial is neither factual, nor feasible, when they were hired to concentrate on the remodeling of a Graceland Shed into an accessible bath. Corresponding discrimination, sexual innuendo, and blatant disregard for professional conduct has created a costly, and dangerous, for a permanently disabled woman, scenario. Defendants were well aware of my disability, as they had worked for my Mother while I lived there, and was not as far advanced as I have become, physically. Moreover, they built a wheelchair ramp for me, as well as

repaired my living room floor while in rehab for a knee replacement. Also they worked on my She'd, where my yard worker/security lives. Proof of all claims will be made via notarized documentation of Mr. Ard's vulgar, rant filled messages. Further proof will be established at trial.

2. In order to address your second defense I will supply facts, at trial, which substantiate my need for relief from these Defendants, I will gain statements from medical doctor which stress the need for an unencumbered area needed to ensure unhindered passage of mobility aids, which I depend on. This allowance of room and safety, corresponding to the utilization of mobility aids, was 100 percent of the reason I added a new bath onto my home. Mr. Ard as aware of this, inasmuch as I am put at substantial danger, due to Mr. Ard and Mr. Causey's refusal to factually address my needs, follow local building codes, and federal law in their work, although paid in full. Their work failed to meet ADA Disability Act Accessibility Guidelines; the 2010 Standards for Accessible Design set minimum requirements both scoping and technical—for newly designed and constructed altered accommodations to be readily accessible and usable by individuals with disabilities. The relief I seek is refund of monies not accounted for in receipt of supplies, that the defendants cover cost of completion of the bath I paid them fully to safely, and to accommodate my needs, complete, costs to repair the door and door jamb to my current bathroom as I have had to use that, due to their failure to complete the job that I paid them for. New locks on all doors on my property, Mr. Ard has only given me one key to the She'd and to the bath addition, the exit door in my bedroom to bath, and to my carport door, each. I have been informed by retailers, other contractors, and friends, two keys come with every lock purchased. I have had to call Mr. Ard to bring me a key to the bath addition, as I did not have one. He said He had given me a key, but he had not. He did immediately come and deliver a key. This was a Sunday, and he had the key. If Mr. Ard gave me the key, as claimed, why did he still have one? It goes to prove this defendant has kept keys to locks that I had paid to have replaced, in light of this fact; I need further replacements paid for, as well as their installation, by the worker of my choice.
3. For your third defense, Failure to Mitigate Damages, having tried, fruitlessly, to speak to Mr. Ard. His vulgarities, repetitive sexual overtures, and false assertions alerted me to the fact I would need to handle this legally. Notarized statements of his messages will be included.
4. For your fourth defense, you fail to meet the criteria establishing any acts of good faith. What was the setting(s) in which they acted in good faith, what purpose was fulfilled by what duties they performed in this presumed good faith, what proof do they have that they observed fair dealing standards, with an absence of fraudulent intent? I have detailed my claims in letter, given to clerk of court, and certified mailed to you with this correspondence

5. For your fifth defense, your defendants have the rights to assert that mentioned, as I have the right to remind counsel an assertion is little more than a statement of opinion. I include notarized copies of factual, belligerent, vulgar dealings initiated by Defendant Ard's failure to follow professional standards, the truth, or civil behavior. I demand I be compensated for such foul treatment, and exposure to dangerous living/bathing facilities I hired to have repaired by Men I thought to be professionals.
6. As for any counterclaim, you will find that I have adequately addressed all your points of defense. Inasmuch as this plaintiff was willing to discuss this, rationally and civilly, but you client's verbal attacks prohibited such, your counterclaim is legally mute.

Therefore, having fully replied to the defendants' answer and counterclaim, the plaintiff demands judgement as follows: All mentioned within number 2 of this letter be rectified, monies not accounted for in receipts, be returned. Money charged be tripled to compensate victim for a job done so horribly she could have been electrocuted, as well as for the horror, tears, and fear the Defendant's actions caused. Especially those of Mr. Charles Ard. Notarized copies of Mr. Ard's messages are included. Inspectors failed report is available to either defendant. Further testimony, photos, reports will be used at trial. Plaintiff respectfully asks counsel to have his client refrain from further contact. Mr. Ard scares me. I remain,

Yours truly,


Victoria Joy Stevens

7.

FILED
HORRY COUNTY
2022 SEP -1 P 2:00
RENEE H. ELYS
CLERK OF COURT
HORRY COUNTY, SC

Victoria Joy Stevens

+

FILED
HORRY COUNTY
2022 SEP -1 P 2:00
RENEE M. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Victoria Joy Stevens

4311 Bryant Street

Loris, SC 29569

Tuesday, June 7, 2022

Mr. Charlie Ard & Mr. Wilbur Causey

2621 Simpson Creek Drive

Loris, SC 29569

FILED
HORRY COUNTY
2022 SEP - 1 P 2:00
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Déar Sirs;

The former of you to whom this is addressed has told me, repeatedly, and vulgarly, that you did not charge too much. The proof is in canceled checks, between April 4, 2022 and May 5, 2022. Said checks total \$22,850.00. Over 3 times what the Graceland Shed you worked on cost. I sought to add an additional bath to my home. Previously you developed a shed in my front yard, working from 7:30 am until 6pm. With my bath addition you never arrived before my yard worker, currently housed on my property, left for work at 8am. You left nearly daily before 3pm; rarely did you work full week, often taking both Thursday and Friday off.

During this work on my bath addition Mr. Ard's conduct and words to me were not professional. This was exceedingly distressing as I gave Mr. Ard no reason for this type behavior. I always paid when asked. I conducted myself appropriately. On several occasions Mr. Ard phoned me at night just to talk, often saying things of a risqué nature. I several times reminded Mr. Ard he was married, and such was neither appreciated nor warranted. Why you chose to conduct yourself in this manner baffled me. Never have we had any type of personal relationship. My familiarity with you has always been through your work; you worked several times for my Mother, and have completed eight jobs such as a wheelchair ramp, and numerous repair of holes in my floors. I cannot imagine why you decided to act this way. Mr. Ard, need I remind you that you are a licensed professional? When you completed my deck and wheelchair ramp, even before, you were knowledgeable of my profound disability. Why would you imagine I would welcome this behavior? Enclosed please find:

copies of reports per Loris building Inspector

notarized statement regarding recordings of inappropriate comments per Mr. Charlie Ard

I feel rather stupid for not making you sign a legal agreement for the addition of this Graceland shed, and upgrades to make it a bathroom. Inasmuch as you and Mr. Causey had completed several jobs for me before, as well as the fact that I met you through Mr. Billy Gore/G&G Construction when the floors

in Mother's house were replaced I felt contractual agreement not necessary. Although I may feel rather stupid, your receipts furnished for supplies, copies of affidavits, canceled checks and statements, and my conversations with Loris building inspector, and his report prove that your work was rushed, over-priced, shoddy, not to code, and horribly unsafe. Your words have been vulgar, and sexually aggressive. Admittedly, I laughed, tried to humor your diatribe, and squelch it, by not taking it seriously. Alas, your responses grew ugly and your words vulgar. You chose to say I threatened you. I simply referred to you as "a Dirty old' Man": as well as told you that your actions were not those permitted by L.L.R.. Building codes address the accommodations provided an individual in my physical condition, they are, factually, Federal Law. I am so disheartened and sickened by your conduct, especially things that you told me the building inspector for Loris told you. Mr. Ard, you told me that the inspector told you one of the rails had to be removed so I could exit if a fire started. The building inspector for Loris, Mr. Jimmy Prince told me he had never talked to you regarding this job.

I asked you, the second week of this job, I asked you to please install rails that helped me. I am disabled. You said yes. It was right after this your words turned to a sexually aggressive nature, and you said to me many times that you did not charge too much. Your presence, at my residence grew shorter, some days not at all. I inquired as to why, and you stated other work.

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You have told me having a license, or not, had no bearing on your ability to work. Therefore copies of this letter and all checks, receipts, and the inspector's report are going to L.L.R. accompanied by a complaint form. Due to the monies I have spent, the hardship this has presented me, and your vulgarity and refusal to speak to me, telling me your attorney said I had no case, I plan on seeking compensation in court as well, I remain,

Yours truly,

6/25/22

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invoices given to me per Mr. Charlie Ard

Copies of reports per Loris building inspector

I feel rather stupid for not making Mr. Ard sign a legal agreement for the addition of the Graceland shed, and upgrades to make it a bathroom. Inasmuch as he and Mr. Causey had completed several jobs for me before, as well as the fact that I met you through Mr. Billy Gore/G&G Construction when the floors in Mother's house were replaced I felt contractual agreement not necessary. Although I may feel rather stupid, his receipts furnished for supplies, copies of canceled checks, and my conversations with Loris building inspector, and his report prove that Mr. Ard and Mr. Causey's work was rushed, over-priced, shoddy, not to code, and horribly unsafe. Mr Ard's words have been vulgar, and sexually aggressive. Admittedly, I laughed, tried to humor his diatribe, and squelch it, by not taking it seriously. His responses grew uglier and his words more vulgar. He chose to say I threatened him. I simply referred to him as "a Dirty old' Man": as well as told him that his actions were not those permitted by L.L.R.. Building codes address the accommodations provided an individual in my physical condition, they are, factually, Federal Law. I am so disheartened and sickened by his conduct, especially things that he told me the building inspector for Loris told him. He told me that the inspector told him one of the rails had to be removed so I could exit if a fire started. The building inspector for Loris, Mr. Jimmy Prince told me he had never talked to him regarding this job.

The second week of this job, I asked him to please install rails that helped me as I am disabled. He said yes. It was right after this his words turned to a sexually aggressive nature, and he said to me many

FILED
Horry County
2022 SEP 16 10:00
RECEIVED
CLERK OF COURT
Horry County

times that he did not charge too much. He and Mr. Causey's presence, at my residence grew shorter, some days not at all. I inquired as to why, and he stated other work.

I paid promptly, and fully when asked. I met my responsibility in our verbal contract. I asked Mr. Ad, a week before he told me if I did not give him a thousand dollars up front that, he would not be back and I could kiss his a#@; would this cost me anymore? He said no. I hired he and Mr. Causey due to my disability and a replaced hip, I could hardly get into my present bathroom. He agreed to complete this job. I paid him all he asked for. While his work was, although not timely, good, or so I thought, his professionalism was totally absent.

I ask him to have this work completed. I am disabled, I cannot presently ambulate, and thus using a walker within my present bath is necessity. My walls and molding bear marks from this, and it is very dangerous. This is on the inspector's report, "1. Need 1 GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault beaker needed for all other outlets 4.No means of egress provided per R301. 1 5. Need thermal expansion device needed on water heater 6, Need handrails on both sides of ramp." I ask that he correct these violations of code. I cannot use this bah for fear of electrocution. Also, and this is atrocious for any contractor; cigarette butts, bent nails, and refuse were left all over my driveway, and around the bath addition, I cleaned this up, although painful and extremely difficult. There is also the fact that when he installed the doors, bedroom door and bath door, I only received one key. Between his antagonism, sexual innuendos, and vulgar heated messages, I ask for funds to change these doorknobs as he, his work, his verbiage, and his response to my concerns, let me know my safety, well-being, and peace of mind are not his concerns. When he worked on the Shed in my front yard, I only received one key to that door, so, I ask that be covered, too.

Mr. Ard has told me having a license, or not, had no bearing on his ability to work. Therefore copies of this letter and all checks, receipts, and the inspector's report are going to L.L.R. accompanied by a complaint form. Due to the monies I have spent, the hardship this has presented me, Mr. Ard's repeated vulgarities and refusal to speak to me, telling me his attorney says I have no case; I plan on seeking compensation in court as well. Mr. Wilbur Causey has, at no time, acted as Mr. Ard has, but he was present during much of this, and was party to what occurred.

FILED
HORRY COUNTY
2022 SEP - 1 P 2:00
RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

TRANSCRIPTS OF CHARLIE ARD'S MESSAGES

22/5/22 Victoria, call me and quit acting stupid. This is Charlie, okay. I want to fix your stuff where it'll pass inspection. Then I'll be through with you, okay...

14/5/22 Victoria, don't call me threatening me. If you do I will have your tail locked up.

12/5/22 Victoria, if you want all steps and all that shit hung up in this building, I'm going to need a thousand dollars, up front! If you don't want it just tell me and I won't fuck with you no more girl!

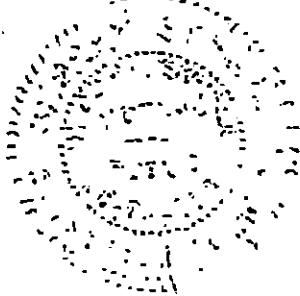
11/5/22 Victoria, I apologize, I'm just tired, and uh... I'll see you in the morning about 8 o'clock, okay baby. I still love you girl, this is Charlie, you know that.

4/5/22 Victoria, this is Charlie. If you think I charge you too much I want you to let me know 'cause I am tired of hearing this shit. Okay? If I charge you too much don't fuck with me, no more!

Victoria J. Stewen

FILED
HORRY COUNTY
2022 SEP -1 P 2:00
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

SWORN to before me this 31st
day of August, 2022.
[Signature]
Notary Public for South Carolina



2022 CP2604125

for Answer filed on 9/1/2022

7022 2642 2000 091E 0202

U.S. Postal Service™	
CERTIFIED MAIL® RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com .	
OFFICIAL USE	
Certified Mail Fee \$4.00	0569
\$	33
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$0.00
☐ Return Receipt (electronic)	\$0.00
☐ Certified Mail Restricted Delivery	\$0.00
☐ Adult Signature Required	\$0.00
☐ Adult Signature Restricted Delivery	\$0.00
Postage \$0.84	
\$	
Total Postage and Fees \$4.84	
\$	
Sent To	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

0692 2642 2000 091E 0202

U.S. Postal Service™	
CERTIFIED MAIL® RECEIPT	
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For delivery information, visit our website at www.usps.com .	
OFFICIAL USE	
Certified Mail Fee \$4.00	0569
\$	33
Extra Services & Fees (check box, add fee as appropriate)	
☐ Return Receipt (hardcopy)	\$0.00
☐ Return Receipt (electronic)	\$0.00
☐ Certified Mail Restricted Delivery	\$0.00
☐ Adult Signature Required	\$0.00
☐ Adult Signature Restricted Delivery	\$0.00
Postage \$0.60	
\$	
Total Postage and Fees \$4.60	
\$	
Sent To	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

FILED
Horry County
2022 SEP -1 P 3:08
RENEE H. ELVIS
CLERK OF COURT
Horry County, SC

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 01-23-2023 09:18:00 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 01-23-2023 09:17:26 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: ADR/Notice of ADR ADR/Notice of ADR

Filed by or on behalf of: Cecilia Cessna

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff,

vs.

Charlie Ard and Wilbur Causey,

Defendants.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

DEFENDANTS' MOTION TO DISMISS
Pursuant to SCRCP 12(b)(6)

FILE NO.: 2022-CP-26-04125

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Defendants, Charlie Ard and Wilbur Causey, will appear on the tenth day after service hereof, or as soon after as counsel may be heard, before a presiding judge of the Horry County Court of Common Pleas, 1301 2nd Ave, Conway, South Carolina, for an Order dismissing the Plaintiffs' Complaint against Defendant Charles Coleman. This motion is made pursuant to Rule 12(b)(6) of the South Carolina Rules of Civil Procedure and is based upon the following grounds, without limitation.

1. "A defendant may move to dismiss the plaintiff's complaint for 'failure to state facts sufficient to constitute a cause of action' pursuant to Rule 12(b)(6), SCRCP." *Fabian v. Lindsay*, 410 S.C. 475, 481, 765 S.E.2d 132, 136 (2014). "A ruling on a motion to dismiss pursuant to Rule 12(b)(6) must be based solely on the factual allegations set forth in the complaint, and the court must consider all well-pled allegations as true." *Id.* "The court may sustain the dismissal when the facts alleged in the complaint do not support relief under any theory of law." *Delaney v. First Fin. of Charleston, Inc.*, 418 S.C. 209, 215, 791 S.E.2d 546, 549 (Ct. App. 2016).

2. Plaintiff's Complaint does not allege any recognizable causes of actions, her

"complaint" is at best a rambling letter. In a light most favorable to the Plaintiff, in her Reply to Defendant's Answer and Counter Claim she seems to be seeking redress for "Corresponding discrimination, sexual innuendo and blatant disregard for professional conduct". Yet she lays out no elements of these claims, nor specific damages. She in short has failed to state any facts sufficient to constitute a cause of action.

3. This Motion is further based upon the Answer and Counterclaims and all other pleadings, the South Carolina Rules of Civil Procedure, and the common and statutory law of South Carolina. Coleman reserves the right to file a brief in support of this motion.

WHEREFORE, Defendants pray as follows:

1. That this Court dismiss the Plaintiff's Complaint against Defendants Charles Coleman.
2. That the Plaintiff be ordered to reimburse Defendants' attorney's fees and costs associated with this motion; and
3. That this Court grant such other and further relief as it deems just and proper.

RIVERTOWN LAW

s/L. Bradley Smith
 L. Bradley Smith, Esquire
 SC Bar #73192
 Attorney for Defendant, Charlie Ard
 Attorney for Defendant, Wilbur Causey
 908 Fourth Avenue
 Conway, South Carolina 29526
 Phone: (843) 488-5600

January 31, 2023

REMAINING PORTION LEFT INTENTIONALLY BLANK

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 02-28-2023 09:15:13 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 02-28-2023 09:11:16 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Motion/Dismiss

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2023 Feb 28 9:34 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

NOTICE OF MOTION SCHEDULING

June 08, 2023



Motion "MDISMS - Motion/Dismiss" for Case: 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard , defendant, et al has been added to the following Motions Roster:

388 - CPNJ Motions (7/10/23 - 7/12/23) Honorable Kristi Curtis (Webex)

This hearing of this motion has been scheduled for 7/12/2023 at 1:30 PM.

The Non-Jury motions roster for the term starting on July 10, 2023 with the Honorable Kristi Curtis presiding, to be heard via WEBEX, has been posted on the Judicial Website. To access the Judge's virtual courtroom, please go to www.sccourts.org, under Calendar - Monthly View, click Circuit on the day of your hearing and find the Judge's virtual courtroom under his/her name.

If your motion is resolved/withdrawn, please e-mail Cecilia Cessna at cessnac@horrycountysc.gov.

Any memos/briefs are to be e-mailed/mailed to the Judge of the week 10 days prior to the hearing.

To request a continuance: Please e-file a motion and a proposed order along with a \$25.00

Mail Notice To:
Victoria Joy Stevens 4311 Bryant St Loris, SC 29569

Court Info:
Common Pleas 1301 2Nd Avenue P O Box 677 Conway, SC 29528-9528

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(843)915-5080

Respectfully,

Renee N. Elvis

Renee N. Elvis
Clerk of Court

91 7199 9991 7039 3863 4285

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 06-09-2023 08:46:31 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 06-09-2023 08:46:19 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Notice/Notice of Hearing Notice/Notice of Hearing

Filed by or on behalf of: Cecilia Cessna

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2023 Jun 09 8:47 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens,

Plaintiff

vs

**PLAINTIFFS' MEMORANDUM IN
OPPOSITION TO DEFENDANTS
MOTION TO DISMISS**

Charles Ard and Wilbur Causey,

Defendants

FILE NO.:2022CP2604125

To: Honorable Kristl Curtis

From: Victoria Joy Stevens

Date: Tuesday, June 27, 2023

HORRY COUNTY
2023 JUL -6 A 11:28
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

The Plaintiff, Victoria Joy Stevens, the plaintiff, respectfully submits the following Memorandum in opposition of an order to dismiss their complaint against Charles Ard and Wilbur Causey.

FACTS

1. Why are my complaints denied, termed not admitted, qualified, or explained? I have submitted factual documentation of the problems which caused Failure of inspection per City of Loris. Inspector Jimmy Prince. Documentation from City Inspection admits these violations of law. Specific code, point of violation follows, and qualifies this complaint. To explain my horror at the Defendant's denial of my complaint, code, with corresponding statute references follow detail of problems.

To name each problem: a) GFCI beaker needed within 6' of sink and shower. The GFCI is designed to protect people from severe or fatal electric shocks but because a GFCI detects ground faults, it can also prevent some electrical fires and reduce the severity of other fires by interrupting the flow of electric current. Also, 125V through 250V receptacles installed in the following dwelling unit locations must be GFCI protected [Sec. 210.9(A)]: (1) Bathroom areas. Feb 20, 2020The latest National Electrical Code requires both AFCI and GFCI protection only in kitchens and laundry rooms (washer/ dryer combo until in middle of this shed). And within those rooms, the Dual Function AFCI/GFCI Receptacle provides what is called "feed-through" protection, which means it provides protection for all wiring and extensions attached to the load side S.C. Code Regs. § 61-91.2300.2305. b) Then failure to protect NM (non-metallic wiring) @

water heater: a simple question to answer this is; can NM cable get wet? NEC Section 334.10(A)(1) specifically permits NM Cable in both exposed and concealed work in normally dry locations it's actually Section 334.12(B)(4) that states NM Cable is not permitted in Wet or Damp location. National Electrical Code®(<https://www.nfpa.org/NEC/About-the-NEC/Free-online-access-to-the-NEC->)Adopted in all 50 states, NFPA 70, National Electrical Code (NEC) is the benchmark for safe electrical design, installation, and inspection to protect people and property from electrical hazards. C) ARCH fault breaker needed for all other outlets. With the adoption of the **2017 National Electrical Code (NEC)**Link above., Arc-Fault Circuit-Interrupter (AFCI) protection is now required in more locations throughout the home. The following explains the types of AFCI protection required locations around dwelling units: Kitchens, Family Rooms, Dining Rooms, Living Rooms, Parlors, Libraries, Dens, Bedrooms, Sunrooms, Recreation Rooms, Closets, Hallways, Laundry Areas, or Similar Rooms or Areas. d) No means of egress provided per R301.1 e) Need thermal expansion device on water heater. A water heater thermal expansion tank is required for both original and replacement water heaters by the International Residential Code (IRC P2903. 4). It's necessary because water expands when heated and is an incompressible liquid. Without a thermal expansion tank, the expanding water in your pipes has nowhere to go. The expansion tank is designed to handle the thermal expansion of water as it heats up in the water heater, preventing excessive water pressure. If water pressure gets to high it can damage valves in plumbing fixtures, joints in supply pipes and the water heater itself. f) Need handrails on both sides of ramps. g) My AC system and lights went totally out; I called Mr. Harold Hemingway who had installed the AC system. He responded promptly. Mr. Hemingway's report explains that Mr. Ard and Mr. Causey had tied a 10-2 wire into the disconnect box for my heat pump in order to supply current to the shed they had finished in my front yard. This caused the disconnect box to overheat, and burnt the wire off. Mr. Hemingway told me I needed get an electrician here ASAP. Mr. James Johnson came, was horrified anyone with any experience had done this, as it could have burnt my home down. Mr. Johnson is currently not in this state. I entered can you safely tie a 10-2 wire into a **disconnect** box for an air conditioning unit to power a shed into my search engine, although not an electrician I can see from reading the wrong sized wire was used. The results could have been disastrous. I am not comfortable explaining this, I will have a licensed electrician do so, at trial.Mr. Hemingway's bill is enclosed. Further reports, bills incurred, and affidavit will be furnished at trial. The Plaintiff was not aware services provided by men she had used numerous times, would be done in such a manner. Plaintiff is disabled, and was financially unprepared for the expenses this type work or failure to follow code would cause.

HERRY COUNTY
CLERK OF COURT
JUL - 6 A 11:28
ELVIS
COUNTY, SC

2. Why is failure to state a claim even mentioned? Admitted in a qualified report, of non-adherence to code even an uninformed reader would realize adherence is necessary to legally proceed.
3. Plaintiff has certified mailed, as well as presented to courts, notarized documentation of Defendant Ard's responses to my complaints, and attempts to discuss this. I have not failed to mitigate. I tried, to no respectful end. Mr. Ard scares me.
4. Why is evidence, and correspondence (certified and presented to the courts) overlooked? The final paragraph of my correspondence, filed with court September 1, 2022, states

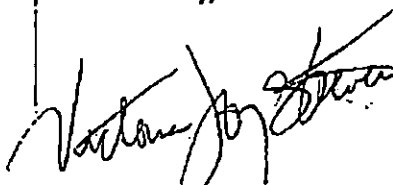
"Therefore, having fully replied to the defendant's answer and counterclaim, the plaintiff demands judgement as follows: : All mentioned within number 1 of this letter be rectified, monies not accounted for, in receipts, Money charged be tripled to compensate victim for a job done so horribly she could have been electrocuted, as well as for the horror, tears, and fear the Defendant's actions caused. Fear, distress and worry were aused by said actions, especially those actions and verbal improprieties of Mr. Charles Ard. Notarized copies of Mr. Ard's messages are included. Inspector's failed report is available to either defendant. Further testimony, photos, reports will be used at trial. Plaintiff respectfully asks counsel to have his client refrain from further contact. Mr. Ard scares me.

5. What proof can you supply that these defendants acted in good faith? Good faith is respect for fundamental rights and freedoms, justice, fairness, order, and reasonableness. Defendants had no respect for my fundamental rights, as shown in the Inspector's failed report. Unless my rights are not inclusive of a job performed to code, and safety. Their contracted job was to develop a Graceland Shed into an accessible bath. I even asked Defendant Ard did he understand my disability? He assured me he did. I had this bath built to accommodate my mobility devices after my fourth knee replacement. My present bathroom bears marks on the door from need to continue to use this bath. My original bath is also not safe to utilize with mobility devices. This seriously hindered my freedoms by not supplying me the accommodating bath in which to prepare for my days. To have charged me, but not to have done what I paid for, is not just, nor is it fair. Any semblance of order passed when Defendant Ard lied to me about the inspector having come by. Mr. Prince never even spoke to Defendants Ard or Causey concerning said job. To use either Defendants' name and the word reasonableness in the same sentence is a travesty prevented by common sense. I could have died due to

their shoddy, rushed, haphazard work. My house could have caught fire due to shortcuts that they took in their work. That is in no way reasonable. I have furnished the courts with notarized statements of Defendant Ard's verbal onslaughts, and will furnish Inspection report. These are sufficient facts to constitute a cause of action.

In conclusion, the Plaintiff has lived daily with the problems caused by a job done with no consideration for a repeat paying client's safety, home, building codes, or legal rights. Said Plaintiff reserves the right to address violations of law at a later date. I remain,

Yours truly,



Victoria Joy Stevens

HORRY COUNTY
2023 JUL -6 A 11: 28
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

City of Loris

South Carolina

Inspection Information**Permit #:** 626**Permit Date:** 02/22/2022**Inspection
Date:** 05/19/2022**Permit Type:****Inspection
Type:** Final Inspection**Requested
By:** Home owner**Contact Info:****Scheduled
Date:** 05/19/2022**Scheduled
Time:** 00:00**Completed
Date:** 05/19/2022**Description:** Need; 1. GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault breaker needed for all other outlets 4. No means of egress provided per R301.1 5. Need thermal expansion device on water heater 6. Need handrail on both sides of ramp.**Inspection
Status:** Failed**Assigned To:** Jimmy Prince**Time In:** 00:00**Time Out:** 00:00**Hours:** 0.0

HORRY COUNTY
2023 JUL -6 A 11: 28
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Notes

05/27/2022 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER
05/08/2023 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER

Property Information**Parcel#:** 17614030023

Victoria Joy Stevens

4311 Bryant St

Loris

Zoning: MULOt: Block:

Victoria Joy Stevens

4311 Bryant St

Loris, SC 29569

Harolds Ac Repair Service And Installation

INVOICE	#110
DUE	Upon receipt
AMOUNT DUE	\$170.92

Victoria Stevens
4311 Bryant St
Loris, SC 29569

CONTACT US
1301 Cedar Branch Rd
Loris, SC 29569
(843) 877-6184
haroldsacrepairservice@gmail.com

HARRY COUNTY
2023 JUL - 6 A 11: 23
REESE N. ELVIS
CLERK OF COURT
HARRY COUNTY

INVOICE

Services	amount
	\$85.00
Checked the system found that someone tied in a 10-2 wire into the disconnect box for the heat pump system. The disconnect box had over heated and burn the wire off. The 60 amp disconnect box was replace for the heat pump system and the 10-2 wire running to the shed was not install back into the disconnect box need to have a electrician run a new circuit for the shed .	
Materials	amount
No Fuse Disconnect	\$85.92
No fuse disconnect	

Subtotal	\$170.92
Total Tax	\$0.00
8% (8%)	\$0.00
Total	\$170.92

Harolds Ac Repair Service And
Installation| M#115496

<http://www.haroldsacrepair.com>

TRANSCRIPTS OF CHARLIE ARD'S MESSAGES

22/5/22 Victoria, call me and quit acting stupid. This is Charlie, okay. I want to fix your stuff where it'll pass inspection. Then I'll be through with you, okay...

14/5/22 Victoria, don't call me threatening me. If you do I will have your tail locked up.

12/5/22 Victoria, if you want all steps and all that shit hung up in this building, I'm going to need a thousand dollars, up front! If you don't want it just tell me and I won't fuck with you no more girl!

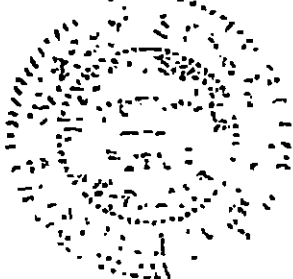
11/5/22 Victoria, I apologize, I'm just tired, and uh... I'll see you in the morning about 8 o'clock, okay baby. I still love you girl, this is Charlie, you know that.

4/5/22 Victoria, this is Charlie. If you think I charge you too much I want you to let me know 'cause I am tired of hearing this shit. Okay? If I charge you too much don't fuck with me, no more!

Victoria J. Stuenkel

FILED
HORRY COUNTY
2022 SEP - 1 P 2:00
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

SWORN to before me this 31st
day of August, 2022
[Signature]
Notary Public for South Carolina





MUSC HEALTH WEST ORTHOPAEDICS
2060 Sam Rittenberg Blvd
Charleston, SC, 29407
Phone: 843-876-0111
Fax: 843-792-2504

March 21, 2023

Patient: **Victoria J Stevens**
Date of Birth: **4/7/1964**
Date of Visit: **3/21/2023**

To Whom It May Concern:

Victoria Stevens is to undergo a knee replacement on 4/4/2023. Please allow her to push her scheduled court date back by one month as she recovers from surgery.

If you have any questions or concerns, please don't hesitate to call.

Sincerely,

Zeke Jonathan Walton, MD

HORRY COUNTY
2023 JUL -6 A 11:29
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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:

Plaintiff has 30 days to file an amended complaint to identify the causes of action and provide facts regarding those causes of action against Defendant. Defendant's motion to dismiss is therefore denied at this time.

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 07/17/2023 .

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCF.



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

Type: Order/Electronic Form 4

So Ordered

s/ Kristi F. Curtis, Circuit Court Judge, No. 2762

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 07-17-2023 04:12:04 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp:

07-17-2023 04:11:58 PM

Court:

CIRCUIT COURT

Common Pleas

Horry

Case Caption:

Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted:

Order/Electronic Form 4-Motion/Dismiss is
Denied.

Filed by or on behalf of:

Kristi F. Curtis

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2023 Jul 17 4:12 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

FILED
HORRY COUNTY

IN THE COURT OF COMMON PLEAS
FIFTEETH JUDICIAL CIRCUIT

2023 AUG -8 P 12: 25

Victoria Joy Stevens,

Plaintiff,

RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

COMPLAINT
(Jury trial requested)

VS

Charlie Ard and Wilbur Causey,

FILE NO: 2022CP2604125

Defendants.

Plaintiff Victoria Joy Stevens brings this action against Defendants Charlie Ard and Wilbur Causey based on the allegations set forth below.

PARTIES

1. Plaintiff is a citizen and resident of Loris, South Carolina.
2. Defendants Charlie Ard and Wilbur Causey are contractors that the Plaintiff and her deceased Mother have used for over a decade; although the Defendants worked for Billy Gore and G&G Construction on their jobs with the Plaintiff's Mother and their first two jobs with the Plaintiff.
3. The location of the defendant's business is Loris, South Carolina.
4. Defendants Ard and Causey are the owners of this business and are citizens and residents of Loris, South Carolina.

JURISDICTION

5. The Court has subject-matter jurisdiction over the claims in this lawsuit under article V § 11 of the South Carolina Constitution.
6. The Court has personal jurisdiction over the Defendants because they both reside and transact business in South Carolina. The address they utilize to obtain a permit to do work from city of Loris is 2621 Simpson Creek Drive, Loris, SC 29569.

VENUE

7. Venue is proper in this circuit under South Carolina Code § 15-7-30 because the Defendants live, reside, or do business in Loris, South Carolina, and the acts and omissions that are the subject of this action occurred in Loris, South Carolina

FACTS

8. On February 22, 2022 the Defendants obtained a permit from the city of Loris to renovate a Graceland Shed into an accessible bathroom for the Plaintiff.
9. The Plaintiff, having undergone ten surgeries on her back and lower extremities, needed an accessible, safe, larger bathroom than the one which was in her home. A washer/dryer unit was also hooked up in this shed. Her current laundry facilities require going down and back upstairs. This was one of my reasons for renovating this shed.
10. Plaintiff, having used said contractors seven times before. Twice while the Defendants worked for Billy Gore, G & G Construction, five other times while they worked by themselves.
11. Defendant Ard told me, early May, my bath was ready to be used. I had things I wanted him to mount on walls, and disability assistive devices to be mounted, too. I let him know I felt his job not done. Notarized copies of his calls are included. I could have been electrocuted had I used this bath, or started a fire.
12. Mr. Ard told me several times the bathroom shed had been inspected. Mr. Jimmy Prince, Inspector with the city of Loris, told me that he had never spoken with Charlie Ard concerning this job. So I had this job inspected 5/19/22. Said job failed; the following is why, inspection report is also attached:
- a) GFCI beaker needed within 6' of sink and shower. The GFCI is designed to protect people from severe or fatal electric shocks but because a GFCI detects ground faults, it can also prevent some electrical fires and reduce the severity of other fires by interrupting the flow of electric current. Also, 125V through 250V receptacles installed in the following dwelling unit locations must be GFCI protected [Sec. 210.9(A)]: (1) Bathroom areas. Feb 20, 2020The latest National Electrical Code requires both AFCI and GFCI protection only in kitchens and laundry rooms (washer/ dryer combo unit in middle of this shed). And within those rooms, the Dual Function AFCI/GFCI Receptacle provides what is called "feed-through" protection, which means it provides protection for all wiring and extensions attached to the load side S.C. Code Regs. § 61-91.2300.2305.

b. Failure to protect NM (non-metallic wiring) @ water heater: NEC Section 334.10(A)(1) specifically permits NM Cable in both exposed and concealed work in normally dry locations it's actually Section 334.12(B)(4) that states NM Cable is not permitted in Wet or Damp location. **National Electrical Code®** (<https://www.nfpa.org/NEC/About-the-NEC/Free-online-access-to-the-NEC>) Adopted in all 50 states, NFPA 70, National Electrical Code (NEC) is the benchmark for safe electrical design, installation, and inspection to protect people and property from electrical hazards.

c. ARCH fault breaker needed for all other outlets. With the adoption of the **2017 National Electrical Code (NEC)** [Link above](#), Arc-Fault Circuit-Interrupter (AFCI) protection is now required in more locations throughout the home. The following explains the types of AFCI protection required locations around dwelling units: Kitchens, Family Rooms, Dining Rooms, Living Rooms, Parlors, Libraries, Dens, Bedrooms, Sunrooms, Recreation Rooms, Closets, Hallways, Laundry Areas, or Similar Rooms or Areas

d. No means of egress provided per R301.1

e. Need thermal expansion device on water heater. A water heater thermal expansion tank is required for both original and replacement water heaters by the International Residential Code (IRC P2903. 4). It's necessary because water expands when heated and is an incompressible liquid. Without a thermal expansion tank, the expanding water in your pipes has nowhere to go. The expansion tank is designed to handle the thermal expansion of water as it heats up in the water heater, preventing excessive water pressure. If water pressure gets to high it can damage valves in plumbing fixtures, joints in supply pipes and the water heater itself.

f. Need handrails on both sides of ramps.

13. Until July of 2022 I thought their work on previous jobs to be good. In July, my ac went out. I called Harold Hemingway, who installed my system. It was shortly thereafter the lights went out, my security, who lives on property, came and told me his electric had gone out. Mr. Hemingway came, went to see what the problem was. He came back in a few minutes, asked who had worked on putting electricity to the shed. I told him Charlie Ard and Wilbur Causey, he knew them, as he often subcontracted his HVAC work through G&G Construction. That is how I met Harold, and why I hired him.
14. Mr. Hemingway let me know the dangerous, shortcut could have burnt my home down, what the Defendants did to run power to the shed in my front yard is detailed in his report. Photographs of what was done, and the results will be shown.

field, is to profess skills. Another falsehood, these contractors' incompetence could have caused injury, or death; not to mention destruction of property. There are two distinct and probable causes for this violation of state and federal code and statute; incompetence, or malice.

FIRST CAUSE OF ACTION (Negligence)

16. To the extent they are not inconsistent with this cause of action; Plaintiff incorporates the allegations of the paragraphs above into this cause of action.

SECOND CAUSE OF ACTION (Breach of Express Warranty S.C. Code Ann. § 36-2-313)

17. To perform an act in which you are reimbursed for your knowledgeable skills and efforts, in a To the extent they are not inconsistent with this cause of action; Plaintiff incorporates the allegations of the paragraphs above into this cause of action
18. Defendants, as professional contractors, owe a duty to their customers' requirements. In this case, Plaintiff's requirements were for a safe, accessible, reasonably priced renovations to provide water, electricity, and finishing to a Pre=constructed Graceland Shed.
19. Defendants breached their duty to Plaintiff by recklessly, willfully, and wantonly performing this duty. As time progressed attendance and attention to work shrank, adherence to state building codes diminished greatly, and sense of duty to client vanished. 20. Defendants' breach caused Plaintiff substantial damages.

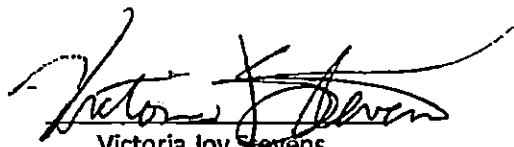
THIRD CAUSE OF ACTION (Fraud)

21. To the extent they are not inconsistent with this cause of action; Plaintiff incorporates the allegations of the paragraphs above into this cause of action.
22. Defendants represented to Plaintiff that they were experienced, knowledgeable builders.
23. Defendants' representations were false, as the Plaintiff learned when their services failed inspection, and were dangerous enough to have caused death..

24. Defendants' representations were material, made to convince me to enter into an agreement to hire them. That and the fact that Charlie Ard lied about having ever spoken to inspector shows the deceit they routinely engaged in. Plaintiff had a need of a safe structure to use for bathing, this charade is unethical for any profession, much less one entrusted with supplying safe living quarters.
25. Defendant Ard knew the representations were false or recklessly disregarded their truth or falsity.
26. Plaintiff was ignorant of the falsity of the representations
27. Plaintiff relied on the truth of the Defendants' representations when she hired men, whose services she had previously used, to satisfaction.
28. As a customer of the Defendants, Plaintiff had a right to rely on their representations.
29. One misrepresentation, which was legality and experience; statute reads: Section 40-59-30. (A) A person or firm who engages or offers to engage in the business of residential building or residential specialty trade contracting without first having registered with the commission or procured a license from the commission, which has not expired or been revoked, suspended, or restricted or who knowingly presents to, or files with, the commission false information for the purpose of obtaining a license or registering with the commission is guilty of a misdemeanor and, upon conviction, must be fined not less than five hundred dollars or more than ten thousand dollars or imprisoned for not less than thirty days, or both.

FILED
HARRY COUNTY
2023 JUN - 8 PM 12:26
JAMES H. ELLIS
CLERK OF COURT
HARRY COUNTY, SC

Plaintiff was consequently and proximately injured by false representations, including the cost of their work, danger presented by having to continue to use a bath in which her mobility devices barely-fit, and loss of the monies she could have made had she not contracted them for services they were not adept at., and left her monies in the stocks that they were in. WHEREFORE, Plaintiff requests that judgment be entered against the Defendants on all causes of action and that Plaintiff be awarded: (1) actual damages; (2) consequential damages; (3) special damages for the proceeds she would have made in her bank stock, rather than liquidating over \$24,000.00 to pay them. (4) Punitive damages; (5) such other and further relief as the Court and jury deem just and appropriate.


Victoria Joy Stevens

(joyphul@sccoast.net)
4311 Bryant St.
Loris, S.C. 29569

City of. Loris

South Carolina

RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

2023 AUG - 8 P 12:26

FILED
HORRY COUNTY

Inspection Information**Permit #:** 626**Permit Date:** 02/22/2022**Inspection Date:** 05/19/2022**Permit Type:****Inspection Type:** Final Inspection**Requested By:** Home owner**Contact Info:****Scheduled Date:** 05/19/2022**Scheduled Time:** 00:00**Completed Date:** 05/19/2022

Description: Need; 1. GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault breaker needed for all other outlets 4. No means of egress provided per R301.1 5. Need thermal expansion device on water heater 6. Need handrail on both sides of ramp.

Inspection Status: Failed**Assigned To:** Jimmy Prince**Time In:** 00:00**Time Out:** 00:00**Hours:** 0.0**Notes**

05/27/2022 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER

05/08/2023 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER

Property Information**Parcel#:** 17614030023

Victoria Joy Stevens

4311 Bryant St

Loris

Zoning: MULot: Block:

Victoria Joy Stevens

4311 Bryant St

Loris, SC 29569

FILED
HORRY COUNTY

2023 AUG -8 P 12:26

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM.



FIRST PALMETTO BANK
Since 1904
Camden, South Carolina

CLERK OF COURT
HORRY COUNTY, SC

OFFICIAL CHECK

No. 060019198

April 08, 2022

AMOUNT

\$ 6,000 00

REMITTER: VICTORIA J. STEVENS

**** Six Thousand and 00/100****

PAY TO THE ORDER OF CHARLIE ARD

MEMO:

VOID AFTER 180 DAYS



Susan Winborn
Carley Meyli
AUTHORIZED SIGNATURE

⑈060019198⑈ ⑆253271916⑆ 56⑈5708656⑈

Details on Back of Check
Security Features Included

FILED
HORRY COUNTY

2023 AUG -8 P 12: 26

RENEE H. ELVIS
CLERK OF COURT

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM.

FP FIRST PALMETTO BANK
Since 1901
Camden, South Carolina

OFFICIAL CHECK

No. 060019200

April 15, 2022

AMOUNT

\$ 5,700.00

REMITTER: VICTORIA JOY STEVENS

**** Five Thousand Seven Hundred and 00/100****

PAY TO THE ORDER OF
CHARLIE ARD

MEMO:

VOID AFTER 180 DAYS

VALID VAL
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D VALID VAL
D VALID VAL

Charlie Meglin
AUTHORIZED SIGNATURE

⑈060019200⑈ ⑆253271916⑆ 56⑈5708656⑈

Details on Back. Security Features Included

FILED
HORRY COUNTY

2023 AUG -8 P 12: 26

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM.



FIRST PALMETTO BANK

Since 1904

Camden, South Carolina

CLERK OF COURT
HORRY CO

OFFICIAL CHECK

No.060027777

April 22, 2022

AMOUNT

\$ 3,250.00

REMITTER: VICTORIA STEVENS

**** Three Thousand Two Hundred Fifty and 00/100****

PAY TO THE ORDER OF

CHARLIE ARD

VOID AFTER 180 DAYS

MEMO:



Tere S. Johnson
Susan Winkler
AUTHORIZED SIGNATURE

⑈060027777⑈ ⑆253271916⑆ 56⑈5708656⑈

Details on Back

Security Features Included



FIRST PALMETTO BANK
P.O. Box 861 Camden, SC 29021
www.firstpalmetto.com

Statement Ending 05/13/2022

Page 4 of 4

DEBIT TRANSACTION FORM
DATE 4/20/22

ACCOUNT NAME: Victoria Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$100.00
045
2305390348
CEN0117791

#0000 04/20/2022 \$100.00

DEBIT TRANSACTION FORM
DATE 4/22/22

ACCOUNT NAME: Victoria Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$3,250.00
045
2305390348
CEN0117791

#0000 04/22/2022 \$3,250.00

The image for this item could not be located

#0000 04/28/2022 \$140.00

DEBIT TRANSACTION FORM
DATE 5/10/22

ACCOUNT NAME: Victoria Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$100.00
045
2305390348
CEN0117791

#0000 05/10/2022 \$100.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWES, SC 29021-2076

Pay to the order of: [Signature]
AMOUNT: \$100.00
FIRST PALMETTO BANK
CEN0117791

#3588 04/18/2022 \$100.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWES, SC 29021-2076

Pay to the order of: [Signature]
AMOUNT: \$123.00
FIRST PALMETTO BANK
CEN0117791

#3744 05/02/2022 \$123.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWES, SC 29021-2076

Pay to the order of: [Signature]
AMOUNT: \$1,000.00
FIRST PALMETTO BANK
CEN0117791

#3762 04/27/2022 \$1,000.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWES, SC 29021-2076

Pay to the order of: [Signature]
AMOUNT: \$2,650.00
FIRST PALMETTO BANK
CEN0117791

#3764 04/29/2022 \$2,650.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWES, SC 29021-2076

Pay to the order of: [Signature]
AMOUNT: \$100.00
FIRST PALMETTO BANK
CEN0117791

#3765 05/04/2022 \$100.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWES, SC 29021-2076

Pay to the order of: [Signature]
AMOUNT: \$2,250.00
FIRST PALMETTO BANK
CEN0117791

#3766 05/04/2022 \$2,250.00

FILED
HORRY COUNTY
2023 AUG -8 P 12:26

3762 1000.00
3764 2650.00
3766 2250.00
5900.00

TRANSCRIPTS OF CHARLIE ARD'S MESSAGES

22/5/22 Victoria, call me and quit acting stupid. This is Charlie, okay. I want to fix your stuff where it'll pass inspection. Then I'll be through with you, okay...

14/5/22 Victoria, don't call me threatening me. If you do I will have your tail locked up.

12/5/22 Victoria, if you want all steps and all that shit hung up in this building, I'm going to need a thousand dollars, up front! If you don't want it just tell me and I won't fuck with you no more girl

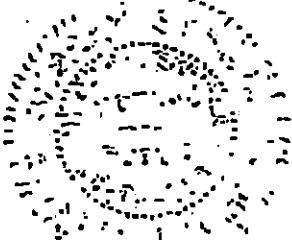
11/5/22 Victoria, I apologize, I'm just tired, and uh... I'll see you in the morning about 8 o'clock, okay baby. I still love you girl, this is Charlie, you know that.

4/5/22 Victoria, this is Charlie. If you think I charge you too much I want you to let me know 'cause I am tired of hearing this shit. Okay? If I charge you too much don't fuck with me, no more!

Victoria J. Stewen

FILED
HORRY COUNTY
2022 SEP - 1 P 2:00
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

SWORN to before me this 31st
day of August, 2022.
[Signature]
Notary Public for South Carolina



Harolds Ac Repair Service And Installation

FILED
HORRY COUNTY

2023 AUG -8 P 12:26

RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

INVOICE

#110

DUE

Upon receipt

AMOUNT DUE

\$170.92

Victoria Stevens
4311 Bryant St
Loris, SC 29569

CONTACT US

1301 Cedar Branch rd
Loris, SC 29569

(843) 877-6184

haroldsacrepairservice@gmail.com

INVOICE

Services

amount

\$85.00

Checked the system found that someone tied in a 10-2 wire into the disconnect box for the heat pump system. The disconnect box had over heated and burn the wire off. The 60 amp disconnect box was replace for the heat pump system and the 10-2 wire running to the shed was not install back into the disconnect box need to have a electrician run a new circuit for the shed.

Materials

amount

No Fuse Disconnect

\$85.92

No fuse disconnect

Subtotal

\$170.92

Total Tax

\$0.00

8% (8%)

\$0.00

Total

\$170.92

Harolds Ac Repair Service And
Installation/ M#115496

<http://www.haroldsacrepair.com>

Victoria Joy Stevens
4311 Bryant Street
Loris, , SC 29569

Lawrence Smith
Rivertown Law
908 4th Avenue
Conway, SC 20526-5145

September 9, 2023

Re: Suggested Mediator for ADR

2022 0926 0426
04125

Sir;

This is my second attempt to contact you to agree on a mediator. I did not certify the first correspondence, so I have no way to prove my claim. However I, again, suggest that we use Jesse Jones of Charleston, SC. He can be contacted at 171 Church St, Suite 120C, Charleston, SC 29401 telephone 8437142535. I would prefer this as my eldest brother, James P. Stevens, Jr, is, or was, the state civil trial arbitrator and mediator, or title close to that. I do not know Mr. Jones and, I feel that is necessary for fairness. Can we agree to use this mediator? I am living daily with an unsafe bathing facility. I paid your clients to finish, to code, a safer, larger bathing facility. I paid well. They did not do their job. Inspection reports prove this. Therefore I endanger extensive surgeries daily. Please respond as soon as possible. I remain,

Yours truly,



Victoria Joy Stevens

cc: Horry County Clerk of Court

FILED
HORRY COUNTY
2023 SEP 11 P 3:53
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

NOTICE OF MOTION SCHEDULING

November 01, 2023



Motion "ADRNOT - ADR/Notice of ADR" for Case: 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard , defendant, et al has been added to the following Motions Roster:

399 - ADR Sanctions Roster - 12/1/2023 - Honorable William H. Seals

(3-D)

This hearing of this motion has been scheduled for 12/1/2023 at 9:30 AM.

PLEASE READ CAREFULLY - The ADR/Sanctions roster with the Honorable William Seals presiding is now available on the Judicial website. All parties are required to appear on Friday, December 1, 2023 at 9:30 am in Courtroom 3-D and show just cause why sanctions should not be imposed for not complying with the mandatory ADR rules for Horry County.

Please e-mail Jennifer Anderson at Anderson.jennifer@horrycountysc.gov ONLY if your case has settled. To be excused from attending the hearing, please e-file a Proposed Order of Mediation, including the date/time of the mediation and the name of the mediator at least 7 days before the hearing..

For continuances, please e-file a motion together with a proposed order no later than Nov 24, 2023.

Mail Notice To:

Victoria Joy Stevens
4311 Bryant St

Loris, SC 29569

Court Info:

Common Pleas
1301 2Nd Avenue
P O Box 677
Conway, SC 29528-9528

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(843)915-5080

Respectfully,

Renee N. Elvis

Renee N. Elvis
Clerk of Court

9489 0090 0027 6172 9472 17

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 11-02-2023 11:52:13 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 11-02-2023 11:52:05 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Notice/Notice of Hearing and Service
Notice/Notice of Hearing and Service

Filed by or on behalf of: Jennifer Anderson

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must
be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2023 Nov 02 2:01 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff

vs

Charlie Ard and Wilbur Causey,

Defendants

TO: BRADLEY SMITH, ATTORNEY FOR THE DEFENDANTS:

The Plaintiff responds to Defendants' First Set of Interrogatories as follow:

FILED
HORRY COUNTY
2023 NOV -2 P 2:20
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

GENERAL OBJECTIONS

1. By providing information in response to these Interrogatories, Plaintiff does not concede the accuracy of Defendant's definitions, assumptions or allegations. Nor does Plaintiff concede that any of the information sought is admissible, material or relevant in these proceedings. Plaintiff does not waive any general or specific objections by providing a response to any of the Interrogatories.
2. Plaintiff has made a reasonable, good-faith inquiry into the subject matter of each Interrogatory. Plaintiff's responses are based on the facts reasonably ascertainable to Plaintiff. Plaintiff reserves the right to modify or amend these responses at any time and as discovery proceeds.
3. Plaintiff objects to these Interrogatories to the extent they attempt to impose burdens and requirements beyond those required by the South Carolina Rules of Civil Procedure. The Plaintiff cites RULE 9 PLEADING SPECIAL MATTERS(c) Conditions Precedent. In pleading the performance or occurrence of conditions precedent, or for conditions precedent, it is sufficient to aver generally that all conditions precedent, or for conditions precedent, have been performed or have occurred. A denial of performance or occurrence shall be made specifically and with particularity.
4. Plaintiff's responses shall not be construed in any way as an admission that any definition provided by Defendant is either factually correct or legally binding upon Plaintiff or a waiver of any of Plaintiff's objections regarding relevancy, discoverability and admissibility.

5. Plaintiff reserves the right to supplement these responses and objections.

INTERROGATORIES

1. Give the names and addresses of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.
- a. Victoria Joy Stevens, Victim, 4311 Bryant St. Loris, S.C. 29569, 843-516-1541, statement taken, will testify.
- b. Terry Lynn Gerald, 3313 Church St. Loris, S.C. 29569, 843-516-0250, friend, employee of victim, no statement taken, will testify.
- c. Randy Lucas, 2915 Sunset Street, Loris, S.C. 29569, 843-473-2767, friend, retired construction worker, written statement of problems he found, later verified by inspection.
- d. Harold Hemingway, owner HVAC company, 2933 Hwy 746, Loris, SC 29569, 843-877-6184, provided the bill for his services containing explanation as to what defendants did, hooking electric to AC Unit, damaging AC and hook up, and potential danger. Told victim she needed find licensed electrician for legal statement, and repair estimate. His bill and summarization of problem, what was done by contractor are attached.
- e. David Singleton, licensed electrician, owner of Singleton Electric, 2811 Allen Dew Road, Conway, SC 29577, 843-997-9655, best price gotten for repairs in order not to have a fire, or be injured by Defendants shoddy, not to code work, and failure to have work inspected. Written statement, estimate for work to be performed. His bill and summarization of problem are attached.
- f. Andy Bisognia, licensed plumber, owner of AB Mechanical, PO Bix 4123, North Myrtle Beach, SC 29597, 843-399-3505, best price gotten for repairs in order not to be scalded/or burnt by overheating water heater. This water heater needs be moved away from electrical panel, due to safety concerns

FILED
HORREY COUNTY
2023 NOV-2 P 2:20
RENEE N. ELYS
CLERK OF COURT
HORREY COUNTY SC

2. For each person listed as a witness concerning the facts of the case, set forth a summary of the important facts known to or observed by such witness and/or provide a copy of any written or recorded statements taken from such witnesses.

- a. Plaintiff Victoria Joy Stevens. Owner of home where dangerous, not to code work was performed. Facts were supplied to Defendants, Counsel, and Court within complaint. Copies of statements, statements from professionals, estimates will be included with this mailing.
- b. Terry Lynn Gerald. Owner of Home's maintenance and security, Mr. Gerald and nephew live on Plaintiff's property. The uncle and nephew provide security, yardwork and lite maintenance. The uncle was witness to the Defendant's failure to show for work on repeated days, also Defendant Ard's vulgarities, and sexually harassing comments. Mr. Ard also vulgarly referred to his suspicions of a sexual relationship between Homeowner and Mr. Gerald. Terry Gerald has stated, and will testify, that the fact Defendant Ard was continuously rebuffed by the Plaintiff gives reasoning why this, paid for, work was so heinously performed. Mr. Gerald will testify.
- c. Randy Lucas. Husband of Plaintiff's life-long friend. He is a life-long constriction worker whom is retired and disabled. He has thirty years construction experience. That was the reason the Plaintiff reached out to him when she was shown no inspection. He was the first to tell Plaintiff not to use this bath addition, Mr. Lucas is the reason the plaintiff is not dead, or seriously injured. Mr. Charlie Ard told her that the bathroom was "Ready to use". His affidavit is enclosed.
- d. Harold Hemingway. The first person to let homeowner know that there were serious, and dangerous to property and person defects in the Defendants' work. Mr. Hemingway's bill, with statement, are enclosed. The aesthetic properties of their work are great, but their electrical work is bad, taking shortcuts, and failing to use/install safety equipment.
- e. David Singleton. The electrician that gave me the lowest price to repair the Defendants' unsafe, substandard work. Mr. Singleton's bill and statement are enclosed.
- f. Andy Bisognia. The plumber who gave me the best quote to repair the Defendants' unsafe, substandard work. Mr. Bisognia's bill and statement are enclosed. Plumber/Owner AB Mechanical PO Box 4123, North Myrtle Beach, SC29597, 843-399-5505. Mr. Andy is the best, most willing to help plumber I know. Having worked for me before, I know his work to be good, timely, fair priced, and he leaves no mess.

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RENEE N. ELVIN
CLERK OF COURT
HORRY COUNTY, SC

3. List the names and addresses of any expert witnesses whom the party proposes to use as a witness at the trial of the case.

My case, nor settlement sought, does not involve an area of services requiring specialized knowledge or expertise, my witnesses have a combo of experience, state licensure, and ownership of business. They can provide objective and unbiased opinions, analysis, and insights that can help the judge and jury understand technical or complex issues related to the defect in report.

3. For each expert whom the party proposes to use as a witness at the trial of the case, set forth a summary of the expert's qualifications, the experts anticipated testimony and opinions, the information and documents utilized by such expert to form his or her opinions and the theory upon which such opinion are based.

An expert witness is a professional who possesses specialized knowledge and expertise in a particular field, and who can provide testimony in court to help clarify technical or complex issues related to the case. If a problem is complex, it means that it has many components. The electrical power system is a complex network that comprises various components, including power plants, substations, transformers, transmission lines and distribution lines. The electricity is generated in power plants and transmitted over long distances with high efficiency. An expert witness on complex electrical systems is not needed here. My witnesses are as follows:

- a. Mr. Terry Lynn Gerald, a friend who provides me security and maintenance in exchange for a place to stay.
- b. Mr. Harold Hemingway, owner HVAC company, 2933 Hwy 746, Loris, SC 29569, 8438776184,
- c. Mr. David Singleton reports that he has over 30 years' experience. He owns his business. Mr. David Singleton was recommended as Electrical professional to use. He will be performing repairs because he was the best priced. Other estimates were double. My total losses do not exceed \$75,000.00. I choose Mr. Singleton. He explained all to me to make the scenario understandable. He would be my choice if you want to go that far. South Carolina's statutory cap on punitive damages would not establish need for expert witness, but if you want to abuse process in order to try and scare me, have at it. His address and number are listed above.
- c. Mr. Andy Bisognia, plumber and owner AB Mechanical PO Box 4123, North Myrtle Beach, SC29597, 843-399-5505. Mr. Andy is the best, most willing to help

plumber I know. Having worked for me before, I know his work to be good, timely, fair priced, and he leaves no mess.

6. Based on your own personal knowledge and observations at the time of the work in question, please describe in detail your version of how it occurred.
- a. The Defendants had successfully completed four jobs for me, I had thought five, until an electrical outage, and damage, due to faulty wiring, nearly burnt my home down.
 - b. The Defendants were hired to renovate a Graceland shed into an accessible bath after my fourth knee replacement. This was a medical accommodation, I explained that to Defendants.
 - c. The Defendants had arrived about 7am on the previous five jobs. The Defendants on this fifth job arrived after 10am, often leaving before 4pm.
 - d. The Defendants had worked five to six days a week on previous jobs. They rarely worked Fridays this job, and never Saturdays. Some weeks they took off Thursdays, too.
 - e. Defendant Ard once actually brought his minor Granddaughter to the job, for their entire workday.
 - f. About this time Mr. Ard starts calling me at night. Repulsed, I remind him he is married.
 - g. Defendant Ard never gave me more than one key to the locks he changed. My maintenance/security Mr. Terry Gerald told me two keys come with every lock. Terry was miffed they might have keys to where he was staying.
 - h. I once called Mr. Ard to tell him I was locked-out, he brought me a key. Why did this defendant have a key to my door, when he was working on my addition?
 - i. Mr. Ard requested and received over \$40,000.00 for a dangerous, life threatening, sloppily done, not to code job. I could have lost my home and my life due to the horrid job Ard and Causey did.
 - j. The abuse and horror does not end there. I file summons and complaint in order to recoup my money so I can have a bath I can use. The Defendants hire one Lawrence Smith attorney at Rivertown law. In phone conversations he tells me the sexually aggressive, foul, nasty things his client Charlie Ard has said to me are not illegal and have no bearing on our case. I guess being disabled and scared to death by these shenanigans is of no importance either.
 - k. This entire scenario has taken its toll on me. I experienced melena, know this is caused by blood, go to the ER, was admitted to the hospital on 9/24/23 to 9/26/23 with bleeding ulcers. This entire mess, with its constant reminder every time I use my current bathroom, brush my teeth, or take a bath, makes me upset. I cry, and that gives me headaches. I take a Goody and that aggravates the ulcers. They bleed. I spent lots of my inheritance on this bath addition, and that is also upsetting, and worries me to death.
 - l. Mr. Ard was well aware of my permanent disability. I guess he imagined I, being disabled, in a wheelchair, would welcome his blatant, nasty sexual advances. When I did not and put him in his place I guess he thought he'd show me by taking my money and leaving me with a needed, uninspected bath which I'd hopefully use. He told me the day

he left for the last time, my bath was "ready to use." Had I used this bath I could have been electrocuted.

- m. There is an over \$700.00 washer / dryer combo that you never have to transfer wet clothes to dry within the addition that I have never gotten to use. Mr. Ard really liked it. In light of what has transpired, and the fact I cannot see if this works due to no valve expansion on the water heater. I ask the courts to cover the replacement of this. That would be insult to injury to have messed that up; given Mr. Ard's years in, and assumed knowledge of construction, and what he has done thus far leads an uninvolved observer to say, "Make sure Charlie didn't, "F%&ck up that laundry combo." After all, he told me the bath was, "ready to use." Unless he is as dumb as heck, he should've known what could happen. The question is dumb or spiteful. Until repaired I do not know if the Laundry combo works. I ask, due to the hateful demeanor and malice shown, that be covered if destroyed.

6. Set forth a list of all documents, photographs, plats, sketches, or other documentary material which in any way relate to the claims of this matter.

- a. photo copies of cashed checks
- b. statement per David Singleton, and bill.
- c. statement per Randy Lucas
- d. statement per Harold Hemingway and bill.

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I spent lots of money on a bath I cannot use, I cannot afford photographs. The work looks great, but could cause injury or death, if used as intended. The Defendants have lied to, and misled a severely disabled woman, for personal gain, and/or rebuffed sexual overtures by one defendant.

7. Set forth an itemized statement of all damages claimed to have been sustained by the party in this matter, including but not limited to the manner in which said damages were calculated and the identity of the entity or person which calculated said damages.

Each Statement Plaintiff submits covers materials, and fees for completed work.

8. Describe by name and citation or other generally recognized identification, decisions, statutes, ordinances, acts, building codes, regulations and legal principles, standards, and customs or usages, which you contend are especially applicable to this action.
- a. This is fully covered in the inspection by Jimmy Price
 - b. Summation of the code violations, defects, and researched problems have been previously sent, but I will try to resubmit.

9. Set forth the facts surrounding the party's knowledge of any and all alleged deficiencies in the project, including but not limited to: a. The date upon which the party first became aware of said deficiencies; b. The name and address of the person(s) who first discovered said deficiencies; c. The actions taken by the party upon the discovery of said deficiencies; and d. The date upon which the party retained any entity or entities to investigate said deficiencies.

All asked for in this interrogatory has been provided.

10. Set forth the particular building code(s) which the party contends was/were applicable to the design and construction of the project.

All asked for in this interrogatory has been provided as well.

11. Set forth the name, address, and official capacity of each person furnishing information used to answer these Interrogatories and state the source(s) of each person's knowledge.

All supplied

12. Identify any contracts, repair orders, reports, invoices, minutes of meetings, or other documents related to your complaint which are or were in your possession, and identify each person you have reason to believe has knowledge of its contents or received a copy of such document.

N/A

13. Please list any and all formal training or job experience you have in regards to building construction, electrical construction, or building code inspection.

N/A

14. Please Identify the "Merchant" as it relates to your second cause of action, Breach of Express Warranty under South Carolina Code §36-2-313.

can't find this

15. Please Identify the "Good" as it relates to your second cause of action, Breach of Express Warranty under South Carolina Code §36-2-313.

can't find this

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16. Please Identify the "Seller" as it relates to your second cause of action, Breach of Express Warranty under South Carolina Code §36-2-313.

Carport And this

17. Please list all of the Jobs the Defendants have completed for you in the past, not including this job.

1. Disability ramp in my Carport entrance.
2. Replacement Kitchen floor.
3. Replacement Den floor.
- 4, Remodeling and electricity to shed in front yard, where my Security/Maintenance lives

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18. Please Identify all person you know the Defendants have worked with in the past.

My Mother, now deceased, while working with Billy Gore.

That is the sole reason a jury trial is of the utmost importance. Reasons defined legally are:

1. "It is unlawful to harass a person (an applicant or employee) because of that person's sex. Harassment can include "sexual harassment" or unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature."
2. "Although the law doesn't prohibit simple teasing, offhand comments, or isolated incidents that are not very serious, harassment is illegal when it is so frequent or severe that it creates a hostile or offensive work environment or when it results - "in an adverse employment decision , such as the victim being fired or demoted", or as in my case overcharged for substandard, not to code, paid for services, and steadily increasing failures to show for work.
3. "The harasser can be the victim's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer, such as a client or customer." that are not very serious, harassment is illegal when it is so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted). In my case the exchange of paid for services I equate with an employers' withholding of employment, or pay. Although I was paying and could have easily fired these men; they were familiar to me, had known me for years, and knew of my disability. All previous jobs, per verbal contract had been completed to satisfaction, With this job there started aggression, sexual innuendo, vulgarities and increasing failures to show for work. This conduct/behavior was continuous, in person, and by phone. Notarizations of calls attached.

that are not very serious, harassment is illegal when it is so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted). In my case the exchange of paid for services I equate with an

employers' withholding of employment, or pay. Although I was paying and could have easily fired these men; they were familiar to me, had known me for years, and knew of my disability. I truly thought that they would do their best. All previous jobs, per verbal contract had been completed to satisfaction. However, with this job there were many, increasing weekly, failures to show for work, and downright vulgar, obnoxious comments and innuendos per Defendant Ard. Defendant Causey was never this way; but he did hear it all. I recall wondering if he were going deaf. This conduct/behavior was continuous, in person, and by phone. Notarizations of calls attached.

All the above is directly off South Carolina Human Affairs Commission webpage. It can be found at <https://schac.sc.gov/employment-discrimination/prohibited-practices-discrimination-types/sexual-harassment> under the Sexual Harassment Discrimination tab.

There are questions to ask a jury such as can they reasonably understand the final sentence, before this site's locale directives? The fact one defendant continuously harassed their employer, and that his codefendant accepted his codefendant's constant abuse and verbal battery of the Plaintiff's psyche as a norm. He, too, took part in the substandard work performed, the excessive billing, the failure to abide by South Carolina LER's building codes, or concern for client safety, playing passive part in what he assumed to be sans repercussion.

The Plaintiff requests, due to the dangerous shoddy, haphazard job, all expenses be paid, in triplicate. These fees need be tripled due to defendant's vulgar responses to a paying client, opposing counsel's insistence these vulgarities were not in violation of law, along with the risk these faults in the job posed to the Plaintiff. Especially after a paying client was expected to tolerate sexual innuendos and repeated vulgarities. I remain,

Yours Truly


Victoria Stevens

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BENEE N. ELVIS

**Department of Orthopaedics
& Physical Medicine**

96 Jonathan Lucas Street
CSB • Suite 708 • MSC 622
Charleston, SC 29425
Patient Care/Scheduling: 843-876-0111
Administrative Office: 843-792-1792
Facsimile: 843-792-3674

Department Chair
Lee R. Leddy, MD

Arthritis & Joint Reconstruction
Harry A. Demos, MD
Richard J. Friedman, MD, FRCSC
Erik J. Hansen, MD
Zeke J. Walton, MD

Foot & Ankle
Christopher E. Gross, MD
Rahn A. Ravenell, DPM
Daniel J. Scott, MD, MBA

General Orthopaedics
James F. Bethze, MD
Howard L. Brilliant, MD
Louis A. Gerena, MD

Hand, Wrist and Microvascular
Dane N. Daley, MD

Orthopaedic Oncology
Lee R. Leddy, MD
Zeke J. Walton, MD

Orthopaedic Trauma
Langdon A. Hartsock, MD, FACS
Kristoff R. Reid, MD

Pediatric Orthopaedics
Pediatric Spinal Disorders & Scoliosis
Matthew A. Dow, MD
Robert F. Murphy, MD
Sara S. Van Nortwick, MD

Physical Medicine & Rehabilitation
Emily A. Darr, MD
Gregory R. Franklin II, MD
Sudeep Mehta, MD
David R. O'Brien, Jr., MD

Shoulder & Elbow
Josef K. Eichinger, MD
Richard J. Friedman, MD, FRCSC
Shane K. Woolf, MD

Spinal Disorders & Scoliosis
Emily A. Darr, MD
John A. Glaser, MD
Gregory R. Franklin II, MD
Sudeep Mehta, MD
David R. O'Brien, Jr., MD
Charles A. Reitman, MD

Sports Medicine
Louis A. Gerena, MD
Harris S. Stone, MD
Shane K. Woolf, MD
Libby E. Winton, MD

*Orthopaedic Research
& Clemson BioEngineering*
William R. Barfield, PhD
Martine LaBerge, PhD
Jessica E. Thaxton, PhD
Yongren Wu, PhD
Hai Yao, PhD

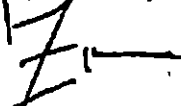
September 21, 2022

Patient: Victoria J Stevens
MRN: 000920112
Date of Birth: 4/7/1964
Location: MUSC Health West Orthopaedics

To Whom It May Concern:

Victoria J Stevens has been seen in our office, most recently on 8/17/22 for chronically infected left total knee arthroplasty with extensor mechanism disruption. Ms. Stevens has a long history of lower extremity dysfunction and multiple surgeries following a traumatic motor vehicle accident on 3/20/90. She has been non-ambulatory since July of 2018 and requires the use of a walker, sometimes a wheelchair for ambulation. Her bathroom in her home is not currently suitable for use with her walker. We find it reasonable for her to undergo renovation of her bathroom to meet standards to allow her to perform ADLs as needed. Please call with any questions or concerns.

Zeke Walton, MD



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City of. Loris

South Carolina

Inspection Information

Permit #: 626

Permit Date: 02/22/2022

Inspection
Date: 05/19/2022

Permit Type:

Inspection
Type: Final InspectionRequested
By: Home owner

Contact Info:

Scheduled
Date: 05/19/2022Scheduled
Time: 00:00Completed
Date: 05/19/2022

Description: Need; 1. GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault breaker needed for all other outlets 4. No means of egress provided per R301.1 5. Need thermal expansion device on water heater 6. Need handrail on both sides of ramp.

Inspection
Status: Failed

Assigned To: Jimmy Prince

Time In: 00:00

Time Out: 00:00

Hours: 0.0

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Notes

05/27/2022 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER
05/08/2023 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER

Property Information

Parcel#: 17614030023

Victoria Joy Stevens

4311 Bryant St

Loris

Zoning: MULOt: Block:

Victoria Joy Stevens

4311 Bryant St

Loris, SC 29569



FIRST PALMETTO BANK
P.O. Box 861 Camden, SC 29021
www.firstpalmetto.com

Statement Ending 04/15/2022

Page 4 of 4

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Check #s
3761 - 2000

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
DATE: 3/22/22
AMOUNT: 100.00
045
2305390348
#0000 03/22/2022 \$100.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
DATE: 3/25/22
AMOUNT: 100.00
045
2305390348
#0000 03/25/2022 \$100.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria J. Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
DATE: 4/1/22
AMOUNT: 300.00
045
2305390348
#0000 04/01/2022 \$300.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Joy Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
DATE: 4/08/22
AMOUNT: 6000.00
045
2305390348
#0000 04/08/2022 \$6,000.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria J. Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
DATE: 4/8/22
AMOUNT: 100.00
045
2305390348
#0000 04/08/2022 \$100.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
DATE: 4/12/22
AMOUNT: 150.00
045
2305390348
#0000 04/12/2022 \$150.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
DATE: 4/15/22
AMOUNT: 5700.00
045
2305390348
#0000 04/15/2022 \$5,700.00

VICTORIA JOY STEVENS
4115 BRIGHT ST.
LOVE, SC 29026
3741
DATE: 3/1/22
AMOUNT: 208.00
FIRST PALMETTO BANK
#3741 03/30/2022 \$208.00

VICTORIA JOY STEVENS
4115 BRIGHT ST.
LOVE, SC 29026
3743
DATE: 3/22/22
AMOUNT: 250.00
FIRST PALMETTO BANK
#3743 04/04/2022 \$250.00

VICTORIA JOY STEVENS
4115 BRIGHT ST.
LOVE, SC 29026
3781
DATE: 4/4/22
AMOUNT: 2,000.00
FIRST PALMETTO BANK
#3781 04/04/2022 \$2,000.00

1500
6000
2000
5700
28,750

Debit 4/8/22 6000
3761 2000
Debit 4/15/22 5700

28,750



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P.O. Box 861 Camden, SC 29021
www.firstpalmetto.com

Statement Ending 05/13/2022

Page 4 of 4

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
DATE: 4/20/22
AMOUNT: \$100.00
CHECK NUMBER: 045
CARD: 2305390348
#0000 04/20/2022 \$100.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
DATE: 4/22/22
AMOUNT: \$3,250.00
CHECK NUMBER: 045
CARD: 2305390348
#0000 04/22/2022 \$3,250.00

The image for this item could not be located
#0000 04/28/2022 \$140.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
DATE: 05/10/22
AMOUNT: \$100.00
CHECK NUMBER: 045
CARD: 2305390348
#0000 05/10/2022 \$100.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWE, SC 29024-3074
DATE: 4/18/22
AMOUNT: \$100.00
CHECK NUMBER: 3588
CARD: 4253271916000230539034803588
#3588 04/18/2022 \$100.00

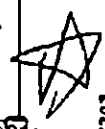
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4111 BRYANT ST.
LOWE, SC 29024-3074
DATE: 5/1/22
AMOUNT: \$123.00
CHECK NUMBER: 3744
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#3744 05/02/2022 \$123.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWE, SC 29024-3074
DATE: 4/27/22
AMOUNT: \$1,000.00
CHECK NUMBER: 3762
CARD: 4253271916000230539034803762
#3762 04/27/2022 \$1,000.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWE, SC 29024-3074
DATE: 4/29/22
AMOUNT: \$2,650.00
CHECK NUMBER: 3764
CARD: 4253271916000230539034803764
#3764 04/29/2022 \$2,650.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWE, SC 29024-3074
DATE: 05/04/22
AMOUNT: \$100.00
CHECK NUMBER: 3765
CARD: 4253271916000230539034803765
#3765 05/04/2022 \$100.00

VICTORIA JOY STEVENS
4111 BRYANT ST.
LOWE, SC 29024-3074
DATE: 5/4/22
AMOUNT: \$2,250.00
CHECK NUMBER: 3766
CARD: 4253271916000230539034803766
#3766 05/04/2022 \$2,250.00



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3762 1000.00
3764 2650.00
3766 2250.00
5900.00
Debit 9280.00

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SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM



FIRST PALMETTO BANK
Since 1904
Camden, South Carolina

BENEFIT CLERK
CLERK OF COURT
HORRY COUNTY, SC

OFFICIAL CHECK

No. 060019200

April 15, 2022

AMOUNT

\$ 5,700.00

REMITTER: VICTORIA JOY STEVENS

**** Five Thousand Seven Hundred and 00/100 ****

PAY TO THE ORDER OF

CHARLIE ARD

MEMO:

VOID AFTER 180 DAYS

VALID VAL
D VALID VAL
D VALID VAL
D VALID VAL
D VALID VAL

Charlie Meglin
AUTHORIZED SIGNATURE

⑈060019200⑈ 1253271916⑈ 56⑈5708656⑈

Details on Back

Security Features Included

060019200

April 15, 2022

REMITTER: VICTORIA JOY STEVENS

**** Five Thousand Seven Hundred and 00/100****

\$ 5,700 00

CHARLIE ARD

MEMO:

060019200 253271916 56 5708656 009

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Horry County, SC

0029265378

>253271916<
First Palmetto Bank #029
2022-04-15
0029265378
Batch 318767104

04/15/2022 12:06 PM
Account 565708656
Receipt

5,700.00

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Horry County, SC

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM.



OFFICIAL CHECK

No.060027777

April 22, 2022

AMOUNT

REMITTER: VICTORIA STEVENS

\$ 3,250.00

*** Three Thousand Two Hundred Fifty and 00/100 ***

PAY TO THE ORDER OF

CHARLIE ARD

VOID AFTER 180 DAYS

MEMO:



Tara S. Johnson
Susan Winbush
AUTHORIZED SIGNATURE

060027777 25327196 56 5708656 06
CLERK OF COURT
HORRY COUNTY, SC
RENEE N. LEVINS

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HORRY COUNTY

Details on Back



Security Features Included

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0029667211

>253271916<
First Palmetto Bank #029
2022-04-08
0029667211
Batch 317779685

04/08/2022 1:42 PM
Br# 29 Tr#2902 Seq# 41
Account 565708656
On Us Check

6,000.00

Charles O. O'Neil

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM.



FIRST PALMETTO BANK

Since 1904

Camden, South Carolina

OFFICIAL CHECK

No. 060019198

April 08, 2022

AMOUNT

\$ 6,000 00

REMITTER: VICTORIA J. STEVENS

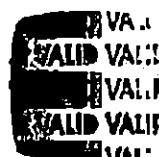
**** Six Thousand and 00/100****

PAY TO THE ORDER OF

CHARLIE ARD

VOID AFTER 180 DAYS

MEMO:



Susan Winborn
Carley Meyler
AUTHORIZED SIGNATURE

060019198 253271916 56 5708656 35 110001 ARD H

2022 NOV -2 P 2:21

FILED
HORRY COUNTY

Details on Back Security Features Included

FILED
HORRY COUNTY

2023 NOV -2 P 2:21

RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

0029917808

>253271916<
First Palmetto Bank #029
2022-04-22
0029917808
Batch 319774366

04/22/2022 3:01 PM
Br# 29 Tlr#2902 Seq# 59
Account 565708656
On Us Check

3,250.90

Singleton Electric

2811 Allen Dew Rd Conway SC 29527

843-997-9655

SC State License

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Horry County
2023 NOV -2 P 2:21
REHEE N. ELYS
CLERK OF COURT
Horry County, SC

To whom it may concern:

On 9/12/23 I David Singleton Electrician, was calling in by home owner Mrs. Victoria Stevens at 4311 Bryant ST. Loris SC to check electrical wiring outside on the right side of her house. I found a burnt electrical disconnect box that was wired illegally against code, which caused an overload on the circuit that caught fire in the disconnect box and could have caused a severe fire damage to her home.

Sincerely,

David Singleton

Owner of Singleton Electric.

Singleton Electric
2811 Allen Dew Conway SC .29527
843-997-9655

Invoice for Mrs. Victoria Stevens
Address 4311 Bryant Street Loris SC

Job description:

1. Hot check Electrical system for 220 power supply for building outside.
2. Change out breakers for more space in panel box for 220 60 amp breaker.
3. Dig ditch from the house to building outside in front yard area.
4. Run 60amp wire in conduit pipe to panel in building and wire it in.
5. Wire into disconnect box
6. Wire from disconnect box under house to panel box in conduit in storage room.
7. Wire into panel to 60 amp breaker.
8. Hot check power in building.

Materials and labor and trip charge: \$2750.00

Require: \$800.00 deposit.

Balance due completion of job ~~\$1900.00~~ 1,750.00

Paid 1,000.00
Balance — 1,750.00

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RENEE H. ELYS
CLERK OF COURT
HORRY COUNTY, SC

Harolds Ac Repair Service And Installation

INVOICE

#110

DUE

Upon receipt

AMOUNT DUE

\$170.92

Victoria Stevens
4311 Bryant St
Loris, SC 29569

CONTACT US

1301 Cedar Branch
Loris, SC 29569

(843) 877-6184

haroldsacrepairservice@gmail.com

RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

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HORRY COUNTY

INVOICE

Services

amount

\$85.00

Checked the system found that someone tied in a 10-2 wire into the disconnect box for the heat pump system. The disconnect box had over heated and burn the wire off. The 60 amp disconnect box was replace for the heat pump system and the 10-2 wire running to the shed was not install back into the disconnect box need to have a electrician run a new circuit for the shed.

Materials

amount

No Fuse Disconnect

\$85.92

No fuse disconnect

Subtotal

\$170.92

Total Tax

\$0.00

8% (8%)

\$0.00

Total

\$170.92

Harolds Ac Repair Service And
Installation | M#115496

<http://www.haroldsacrepair.com>

My name is Randy Lucas. I reside in Loris, S.C. I can be contacted at 843-473-2767. I have been close friends with Victoria Stevens since right after meeting my wife, Carla. They have been friends from their pre-teen years. Victoria had a Graceland shed she bought turned into a bathroom, and due to her knowledge of my years in construction asked me to come over and look at it. She told me the contractors had told me her bathroom was ready to use, but she had not seen passed inspection for their work. I came right over to her house. With my years of experience I knew an addition, with plumbing and electricity should have legally been inspected. I was curious as to why anyone in Construction would commit such an error.

Upon arrival at Victoria's house to look at this new exterior bathroom first thing I noticed was there was no egress, that the porch was totally enclosed with an enclosed ramp to the door to her bedroom. There was no way for her to exit the structure if needed. As I entered I saw that there were no Ground Fault Circuit Interrupters (GFCI) in the bathroom, anywhere. There are breakers that are designed to shut the power off in less than a second; these are a needed electrical safety device which save lives by reducing death or the risk of serious harm from an ongoing electric shock. I started to see why inspection had been a detail these contractors avoided. Then I saw that the receptacles and light switches were too close to the water sources; this is another cause for my alarm, risk of electrocution is prominent with this oversight. Then I really became angry. The water heater did not have an expansion valve to keep it from exploding. With her shower and washer with 11 feet of each other this was yet another disastrous mistake. I angrily told Victoria do not use this bath or washer/dryer as there were several serious mistakes that could cost her life, or bad injury. As we went back through her house I noticed there were no steps or exit, and no way for her to exit. Victoria' got in a bad wreck in 1990. We thought we had lost her. She has recovered so much. She was in a coma over a year! My wife and I said many a prayer; far too many for her to die from substandard, careless, shoddy contracting. I have my report off over 30 years in construction, both electrical and plumbing. I am retired and disabled currently. I do not hold a Contractor's license.

Randy Lucas 10/16/2023



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HORRY COUNTY
2023 NOV -2 P 2:21
GENE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

SWORN to before me this 16th
day of OCTOBER, 2023.

Notary Public for South Carolina

**Department of Orthopaedics
& Physical Medicine**

96 Jonathan Lucas Street
CSB • Suite 708 • MSC 622
Charleston, SC 29425
Patient Care/Scheduling: 843-876-0111
Administrative Office: 843-792-1792
Facsimile: 843-792-3674

Department Chair
Lee R. Leddy, MD

Arthritis & Joint Reconstruction
Harry A. Demos, MD
Richard J. Friedman, MD, FRCSC
Erik J. Hansen, MD
Zeke J. Walton, MD

Foot & Ankle
Christopher E. Gross, MD
Rahn A. Ravenell, DPM
Daniel J. Scott, MD, MBA

General Orthopaedics
James F. Bethca, MD
Howard L. Brilliant, MD
Louis A. Gerena, MD

Hand, Wrist and Microvascular
Dane N. Daley, MD

Orthopaedic Oncology
Lee R. Leddy, MD
Zeke J. Walton, MD

Orthopaedic Trauma
Langdon A. Harstock, MD, FACS
Kristoff R. Reid, MD

Pediatric Orthopaedics
Pediatric Spinal Disorders & Scoliosis
Matthew A. Dow, MD
Robert F. Murphy, MD
Sara S. Van Nortwick, MD

Physical Medicine & Rehabilitation
Emily A. Dart, MD
Gregory R. Franklin II, MD
Sudeep Mehta, MD
David R. O'Brien, Jr., MD

Shoulder & Elbow
Josef K. Eichinger, MD
Richard J. Friedman, MD, FRCSC
Shane K. Woolf, MD

Spinal Disorders & Scoliosis
Emily A. Dart, MD
John A. Glaser, MD
Gregory R. Franklin II, MD
Sudeep Mehta, MD
David R. O'Brien, Jr., MD
Charles A. Reitman, MD

Sports Medicine
Louis A. Gerena, MD
Harris S. Slone, MD
Shane K. Woolf, MD
Libby E. Winton, MD

*Orthopaedic Research
& Clemson BioEngineering*
William R. Barfield, PhD
Martine LaBerge, PhD
Jessica E. Thaxton, PhD
Yongren Wu, PhD
Hai Yao, PhD

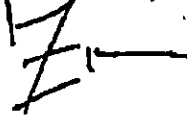
September 21, 2022

Patient: Victoria J Stevens
MRN: 000920112
Date of Birth: 4/7/1964
Location: MUSC Health West Orthopaedics

To Whom It May Concern:

Victoria J Stevens has been seen in our office, most recently on 8/17/22 for chronically infected left total knee arthroplasty with extensor mechanism disruption. Ms. Stevens has a long history of lower extremity dysfunction and multiple surgeries following a traumatic motor vehicle accident on 3/20/90. She has been non-ambulatory since July of 2018 and requires the use of a walker, sometimes a wheelchair for ambulation. Her bathroom in her home is not currently suitable for use with her walker. We find it reasonable for her to undergo renovation of her bathroom to meet standards to allow her to perform ADLs as needed. Please call with any questions or concerns.

Zeke Walton, MD



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HORRY COUNTY
2023 NOV - 2 P 2:21
RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

AB MECHANICAL

"Serving All Of The Grand Strand"
Plumbing & Electric
P.O. Box 4123 • North Myrtle Beach, SC 29597
843-398-5505 • 803-307-9215

DATE OCT 15/23	☒ SERVICE ☐ INSTALL	☐ WIRE ☐ DEWATER	PHONE 516 1541
NAME Vic Stearns	CITY Myrtle Beach		STATE SC
ADDRESS 4311 Bryant St	COUNTY Myrtle		ZIP 29597
LORIS 99569 SC	MODEL 2		SERIAL 1
ITEM TO BE SERVICED Hot water H.R.		NATURE OF SERVICE REQUEST Brake Cab	
QUAN.	DESCRIPTION OF PARTS OR MATERIALS	AMOUNT	
	Exhaust tank & fitting - Ref. 1000		
	Electric Cut off & wire		
	move H.W. from under		
	lammell Box repair & repair		
	with Exhaust tank		
	Part & Labor		7.50 00
LABOR PERFORMED		TOTAL MATERIALS	
Move Heater from under		TAX	
lammell Box / repair & repair		TOTAL LABOR	7.50 00
		TOTAL AMOUNT	7.50 00
DATE WANTED 10/15/23	DEPOSIT \$	RECEIVED BY [Signature]	
ESTIMATES ARE FOR LABOR ONLY, MATERIAL ADDITIONAL. WE WILL NOT BE RESPONSIBLE FOR LOSS OR DAMAGE CAUSED BY FIRE, THEFT, TESTING OR ANY OTHER CAUSES BEYOND OUR CONTROL.			
AUTHORIZED BY:		CUSTOMER'S CLAIM CHECK	

TERMS - NET CASH
NO GOODS HELD OVER 30 DAYS

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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:

Mediation shall be completed within 90 days.

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 12/06/2023 .

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRCP.



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

Type: Order/Electronic Form 4

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 12-06-2023 10:40:43 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 12-06-2023 10:40:39 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order/Electronic Form 4-Mediation shall be
completed within 90 days.

Filed by or on behalf of: William H. Seals

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2023 Dec 06 10:40 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

2022-CP-26-4125

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF HORRY
FIFTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens

Plaintiff

Tuesday, December 5, 2023

Vs

Charlie Ard and Wilbur Causey

Defendants

MEMORANDUM SETTING

FILED
HORRY COUNTY
2023 DEC 27 P 2:12
RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

FILE NO. 2022CP2604125

To: Attorney Lawrence Smith
Rivertown Law
908 4th Avenue
Conway, SC 29526-5145

From: Victoria Joy Stevens
4311 Bryant Street
Loris, SC 29569-2676

FILED
HORRY COUNTY
2023 DEC 27 P 2:12
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

CONFIDENTIAL MEDIATION STATEMENT

INTRO

The Plaintiff appreciates the courts order for Mediation. Below please find facts, with statute number of this case. Following please find the Plaintiff's proposals relative to legally resolve said dispute.

The Plaintiff, Victoria Joy Stevens, respectfully submits the following issues which need to be resolved. These facts are submitted in the Horry County Court of Common Pleas. All the following were facts from failed inspection documented by City of Loris Building Inspector Jimmy Prince. Said inspection establishes the fact that these Inspection deficits were composed majorly of failure to follow code, and that they were threatening to life, and to property. I will utilize statements from former construction experts, plumbers, and electricians. Had the Plaintiff utilized the bathroom facilities Defendant Charlie Ard told her was ready to be utilized, she could have suffered electrocution; perhaps death or serious injury. Plaintiff has severe disability and requires mobility devices. They are hard to maneuver, thus horribly unsafe, in her current bath. Plaintiff furnishes statement from her last surgeon, Dr. Zeke Walton, MUSC Orthopedics. Plaintiff's security, maintenance, and life-long friend will testify as to the growing frequency, senselessness, and lack of seriousness Defendants continuously displayed poor work attendance, verbal harassment, and blatant ignorance of procedure with what Plaintiff hired them to do.

Plaintiff was knowledgeable of the defendants through their work at her Mother's home in the nineties. Both defendants were aware of the Plaintiff's disability; and completed these jobs for her at her current residence:

COMPLETED JOBS

1. Building of a disability ramp into the carport entrance of her home.
2. thru 4. Removal and replacement of three floors:
 - A: current bath
 - B: Kitchen
 - C: den
5. Renovation of a Shed into office space, with toilet

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 Horry County
 2023 Dec 2 P 2:12
 REECE HEWES
 CLERK OF COURT
 Horry County
 2023

Plaintiff realized, after her 5th joint replacement, and problems moving around within it, that her current small bathroom was a danger; she therefore purchased another Graceland shed to be reconstructed into a more accessible bath. She decided to use the men who had completed five jobs for her. She thought their work exemplary, safe, and, most importantly, they knew of her disability. Having previously worked for her Mother, she knew their interior efforts to be good. What transpired after purchase of the shed to be renovated into an accessible bathroom, defies law, business and common sense.

January 21, 2022 Plaintiff bought the shed to be renovated. These contractors agreed to start mid-February. Before they started Plaintiff asked Mr. Ard did he understand she was disabled and needed certain things to help her? He assured me yes. They, however, stalled until April. Finding, hiring, and knowing the work of contractors is not in my skills, so I waited. Stalling grew from 3 weeks to 7 weeks. Their attendance to this job was sporadic. They arrived late and left early. It was at this time Mr. Ard's demeanor became sexually aggressive and rude. He repeatedly made sexual comments, and inferred things of a sexual nature. Even innuendos of an assumed sexual relationship with her tenant/security/maintenance. Mr. Ard even brought his minor granddaughter to work with him once. This job was not treated as a serious job, nor approached with professionalism. Moreover injury and death could have been sustained. The work was performed hastily, and carelessly, and sans attention to legality. It was necessary for me to take money out of investment to make repairs that were needed. This is how I support myself, investment. I seek compensation for the following facts:

REASONS FOR FAILED INSPECTION

1. Defendant Ard ran into and over things, not in the driveway, but in my yard. Damages of less than \$100. Defendant Ard even got out of his truck, looked at damage, turned to go to Bath shed and did not inform me, or say a word.
2. The Defendants left refuse and cigarette butts all over my property. Costs of \$100 to have yard cleaned of refuse and cigarette butts. I am not able, and this is known fact. During previous jobs they did not do this.
3. GFCI breaker within 6' of sink and shower. The National Electric Code requires Ground Fault Circuit Interrupters in wet areas, inclusive of bathrooms. Just about every region has some sort of requirement for ground-fault detection, and thousands of lives have been saved around the globe. The GFCI is designed to protect people from severe or fatal electric shocks but because a GFCI detects ground faults, it can also prevent some electrical fires and reduce the severity of other fires by interrupting the flow of electric current. The Defendants left GFCI breakers out

when installing my bathroom. Mr. Charlie Ard, in fact, told this plaintiff my bath was ready to use.

After research this was learned: The NEC requires that all outlet receptacles in a bathroom be GFCI protected. Outlet circuit must be 20 amps: The outlets in a bathroom should be served by a 20-amp circuit, separate from the lighting circuit, to provide power items such as curling irons, razors, and hairdryers.

According to the National Electric Code (NEC), it requires a minimum of one GFCI-protected outlet per bathroom. The national recommendation is more than one, like two or three. You get to decide how many outlets you want to protect but have to have a minimum of one in your bathroom.

GFCIs are a type of circuit breaker used to shut off power when there is an imbalance between the incoming and outgoing current the main purpose of GFCI outlets is to prevent the risk of electrical shock from happening. Barely noticeable in the bathroom, a GFCI outlet can prevent shocks and electrocution. **210.8 NEC Requirements for GFCI protection.** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.

4. Protect NM at water Heater.

Runs of NM cable must be supported at least every 54 inches. They also must be secured within 12 inches of an electrical box that includes a cable clamp or within eight inches of a box or enclosure without a cable clamp.

Without conduit, wires can get damaged, which can lead to electrical fires and shocks. The insulation on unprotected wires can wear off over time, exposing live wires. Properly installed conduit makes inspection, maintenance, and repairs much easier. Wiring must comply with **NEC Sect 300.4** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.

5. ARCH fault breaker needed for all other outlets.

An arc fault breaker differs from a GFCI outlet or circuit breaker in that it detects slow electrical leaks. A slow leak typically occurs when wiring is compromised but not completely shorted. Some studies reveal that electrical wiring issues account for over 150 home fires across the United States *each day*. A slow leak typically occurs when wiring is compromised but not completely shorted. Slow, but still hazardous. An AFCI is a product that is designed to detect a wide range of arcing electrical faults to help reduce the electrical system from being an ignition source of a fire. Conventional overcurrent protective devices do not detect low level hazardous arcing currents that have the potential to initiate electrical fires. **NEC Sect 2310.12 (D) AFCI Protection** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.

6. No means of egress provided, I am disabled, and what am I supposed to do if there is a fire? I cannot utilize this added bath until this is done, and after all my expenditures due to using these contractors, I cannot presently afford this work.

7. Need thermal expansion device on water heater. This is an additional device installed between the cold water pipe and water heater. That provides pressure relief when the tank's volume reaches maximum capacity. Can you envision what happens when heated water can't expand?

2022-CP-26-4125

Hot water everywhere. **2018 IPC 601.1 & 607.3** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair

8. Need handrails on both sides of ramp. Also need egress from bath shed to ground in case This is also something I cannot presently afford. I ask for \$5,000.00 to cover # 6.
9. There is also the fact the defendants wired the shed, illegally and against code, to a power source. They did this by tying a 10-2 wire into the disconnect box for the heat pump. This caused a circuit overload, which caught this disconnect box on fire. This could have caused severe fire damage to my home. It blew the shed in front wiring, and a new circuit needed be run to that shed. The disconnect box/fuse needed to be replaced. **South Carolina Fire Code, NFPA 70, NFPA 110 and NFPA 111.** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.
10. No inspection was garnered, Violation of **E3403.2 Inspection Required 32 NEC Code.** New electrical work and parts of existing systems affected by new work or alterations shall be inspected by the building official to ensure compliance with the requirements of Chapters 34 through 43.
11. Three doorknobs / locks need be replaced. The Defendants have replaced three knobs/locks the door they created from my bedroom to get to my bath shed, the bath shed door, and my Office shed door. I ask for \$300.00 to have this work completed. That is to replace 3 knob/bolts, and 2 dead bolts.
12. Plaintiff has steadily and faithfully used the services of the Defendants or their previous employer, G&G Construction, while at 4311 Bryant St. Loris, S.C. Prior to this, and when first at current home, both Defendants knew of the Plaintiff through their work with G&G Construction. Plaintiff's disability has been severe since she or her Mother began to utilize these workers. To suffer the nasty, unwarranted, vitriolic, intrusive attacks by Mr. Ard has affected me horribly at a time of pain and medical need. I ask punitive damages are awarded that triple the costs, due to the pain and emotional suffering incurred.
13. The Defendants left refuse and cigarette butts all over my property. Costs of \$100 to have yard cleaned of refuse and cigarette butts. I am not able, and this is known fact. During previous jobs they did not do this.
14. South Carolina Courts hold that builders have an implied duty to perform work to standards, to code and safely.
15. Opposing Counsel, Mr. Lawrence Smith, holds that his client's repetitive, vulgar, unwarranted attacks, comments, and behavior were not illegal. Plaintiff begs to differ, offering the following as proof:

FILED
Horry County
2022-01-27 P 2:11
CLERK OF COURT
J. ELVIS
Horry County

2022-02-26-4125

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HORRY COUNTY
2023 DEC 27 P 2:12
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

The Plaintiff wishes to attempt mediation to resolve all of its disputes with the Defendants and makes the following proposals.

PROPOSALS

- A. That the Defendants compensate Plaintiff for the necessary repairs needed to bring their work to code. Receipts from licensed Plumber and Electrician will be supplied.
- B. That Defendants pay for modifications needed to make their work ADA compliant. These are Reasons for Failed Inspection 4 and 6. Plaintiff asks for \$1500 to cover having this work done.
- C. During the course of time jobs were performed at 4311 Bryant St. Loris, S.C. Four knobs/locks were changed. Plaintiff only received one key per lock. Door knobs with locks come with two keys, always. Plaintiff requests all knobs/locks be changed by worker of her choice at Defendant's expense, or \$500.00 to cover this work.
- D. Fees for Mediation are split. Plaintiff's fee deducted from her settlement.
- E. Punitive Damages need be awarded for Plaintiff having to deal with repetitive, vulgar, harassment while having job done, and voicing concerns over said job, which presented extreme dangers to Plaintiff's recent, numerous surgeries. Plaintiff requests three times the amount this job cost her. Opposing counsel, Atty. Lawrence Smith, told the plaintiff verbatim that this was not illegal. Statute differs: 2019 South Carolina Code of Laws
Title 16 - Crimes and Offenses

2022 CP-26-4125

Chapter 3 - Offenses Against The Person
Section 16-3-1700 B.

- F. The physical pain, combined with the fear of undoing costly, painful surgeries, that this bath addition was purchased to prevent is an added cost, but there is no way to calculate a number for that.
- G. Fees for Mediation be split. Plaintiff's fee deducted from her settlement.
- H. Inasmuch as Plaintiff's secondary source of income is dividends from investment; she respectfully requests replacement of monies in interest lost due to repairs required to utilize the bathroom she paid for which was not-to code, therefore unsafe. Debits/ credits to checking will be provided.

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Horry County
2023 DEC 27 P 2:12
RENEE N. ELVIS
CLERK OF COURT
Horry County, SC

2022 CP-26-4125

**2019 South Carolina Code of Laws
Title 16 - Crimes and Offenses
Chapter 3 - Offenses Against The Person
Section 16-3-1700. Definitions.**

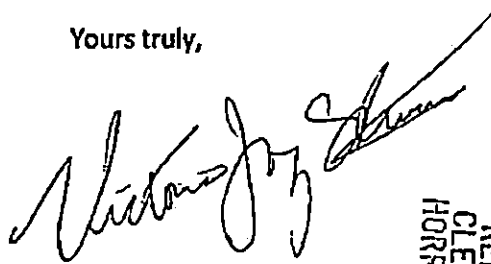
Universal Citation: SC Code § 16-3-1700 (2019)

Harassment in the second degree may include, but is not limited to, verbal, written, or electronic contact that is initiated, maintained, or repeated. (A) "Harassment in the first degree" means a pattern of intentional, substantial, and unreasonable intrusion into the private life of a targeted person that serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress.

(B) "Harassment in the second degree" means a pattern of intentional, substantial, and unreasonable intrusion into the private life of a targeted person that serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress.

Plaintiff wishes to resolve these facts, costs and damages through Mediation. Please find enclosed, dated, electronically filed order of Mediation to be complete within 90 days. I remain,

Yours truly,



Victoria Joy Stevens

FILED
HORRY COUNTY
2023 DEC 27 P 2:12
RENEE H. ELYS
CLERK OF COURT
HORRY COUNTY, SC

CC: Horry County Clerk of Court

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

CERTIFIED COPY
RENEE N. ELVIS
CLERK OF COURT
Horry County, SC

Charlie Ard et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came to 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), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCP; ☐ 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:

Mediation shall be completed within 90 days.

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 12/06/2023.

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of Judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRCP.

FILED
HORRY COUNTY

2023 DEC 27 P 2:13

RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al
Case Number: 2022CP2604125
Type: Order/Electronic Form 4

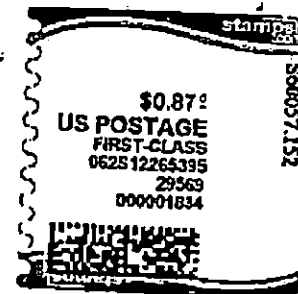
IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Electronically signed on 2023-12-06 09:52:40 page 3 of 3

FILED
HORRY COUNTY
2023 DEC 27 P 2:13
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

V. Stevens
4311 Bryant St.
Loris SC 29569



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HORRY COUNTY

2023 DEC 17 2:08 PM
Horry County Clerk's Office
1301 2nd Ave
Conway SC 29529
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF HORRY
FIFTHTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens

Plaintiff

Tuesday, December 5, 2023

Vs

Charlie Ard and Wilbur Causey

Defendants

MEMORANDUM SETTING

FILED
HORRY COUNTY
2024 JAN -3 P 1:00
RENEE H. ELYS
CLERK OF COURT
HORRY COUNTY, SC

FILE NO. 2022CP2604125

To: Attorney Lawrence Smith
Rivertown Law
908 4h Avenue
Conway, SC 29526-5145

From: Victoria Joy Stevens
4311 Bryant Street
Loris, SC 29569-2676

FILED
HORRY COUNTY
2024 JAN -3 P 1:01
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

CONFIDENTIAL MEDIATION STATEMENT

INTRO

The Plaintiff appreciates the courts order for Mediation. Below please find facts, with statute number of this case. Following please find the Plaintiff's proposals relative to legally resolve said dispute.

The Plaintiff, Victoria Joy Stevens, respectfully submits the following issues which need to be resolved. These facts are submitted in the Horry County Court of Common Pleas. All the following were facts from failed inspection documented by City of Loris Building Inspector Jimmy Prince. Said inspection establishes the fact that these inspection deficits were composed majorly of failure to follow code, and that they were threatening to life, and to property. I will utilize statements from former construction experts, plumbers, and electricians: Had the Plaintiff utilized the bathroom facilities Defendant Charlie Ard told her was ready to be utilized, she could have suffered electrocution; perhaps death or serious injury. Plaintiff has severe disability and requires mobility devices. They are hard to maneuver, thus horridly unsafe, in her current bath. Plaintiff furnishes statement from her last surgeon, Dr. Zeke Walton, MUSC Orthopedics. Plaintiff's security, maintenance, and life-long friend will testify as to the growing frequency, senselessness, and lack of seriousness Defendants continuously displayed poor work attendance, verbal harassment, and blatant ignorance of procedure with what Plaintiff hired them to do.

Plaintiff was knowledgeable of the defendants through their work at her Mother's home in the nineties. Both defendants were aware of the Plaintiff's disability; and completed these jobs for her at her current residence:

COMPLETED JOBS

1. Building of a disability ramp into the carport entrance of her home.
2. thru 4. Removal and replacement of three floors:

A. current bath
B. kitchen

5. Renovation of a Shed into office space, with toilet

Plaintiff realized, after her 5th joint replacement, and problems moving around with it, that her current small bathroom was a danger; she therefore purchased another Grace land shed to be reconstructed into a more accessible bath. She decided to use the men who had completed five jobs for her. She thought their work exemplary, safe, and, most importantly, they knew of her disability. Having previously worked for her Mother, she knew their interior efforts to be good. What transpired after purchase of the shed to be renovated into an accessible bathroom, defies law, business and common sense.

January 21, 2022 Plaintiff bought the shed to be renovated. These contractors agreed to start mid-February. Before they started Plaintiff asked Mr. Ard did he understand she was disabled and needed certain things to help her? He assured me yes. They, however, stalled until April. Finding, hiring, and knowing the work of contractors is not in my skills, so I waited. Stalling grew from 3 weeks to 7 weeks. Their attendance to this job was sporadic. They arrived late and left early. It was at this time Mr. Ard's demeanor became sexually aggressive and rude. He repeatedly made sexual comments, and inferred things of a sexual nature. Defendant Ard made innuendos of an assumed sexual relationship with her tenant/security/maintenance. Mr. Ard even brought his minor granddaughter to work with him once. This job was not treated as a serious job, nor approached with professionalism. Moreover injury and death could have been sustained. The work was performed hastily, and carelessly, and sans attention to legality. It was necessary for me to take money out of investment to make repairs that were needed. This is how I support myself, investment. I seek compensation for the following facts:

REASONS FOR FAILED INSPECTION

1. GFCI breaker within 6' of sink and shower. The National Electric Code requires Ground Fault Circuit Interrupters in wet areas, inclusive of bathrooms. Just about every region has some sort of requirement for ground-fault detection, and thousands of lives have been saved around the globe. The GFCI is designed to protect people from severe or fatal electric shocks but because a GFCI detects ground faults, it can also prevent some electrical fires and reduce the severity of other fires by interrupting the flow of electric current. The Defendants left GFCI breakers out when installing my bathroom. Mr. Charlie Ard, in fact, told this plaintiff my bath was ready to use.

After research this was learned: The NEC requires that all outlet receptacles in a bathroom be GFCI protected. Outlet circuit must be 20 amps: The outlets in a bathroom should be served by a 20-amp circuit, separate from the lighting circuit, to provide power items such as curling irons, razors, and hairdryers.

According to the National Electric Code (NEC), it requires a minimum of one GFCI-protected outlet per bathroom. The national recommendation is more than one, like two or three. You get to decide how many outlets you want to protect but have to have a minimum of one in your bathroom.

GFCIs are a type of circuit breaker used to shut off power when there is an imbalance between the incoming and outgoing current the main purpose of GFCI outlets is to prevent the risk of electrical shock from happening. Barely noticeable in the bathroom, a GFCI outlet can prevent shocks and electrocution. **210.8 NEC Requirements for GFCI protection.** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.

2. Protect NM at water Heater.

Runs of NM cable must be supported at least every 54 inches. They also must be secured within 12 inches of an electrical box that includes a cable clamp or within eight inches of a box or enclosure without a cable clamp.

Without conduit, wires can get damaged, which can lead to electrical fires and shocks. The insulation on unprotected wires can wear off over time, exposing live wires. Properly installed conduit makes inspection, maintenance, and repairs much easier. Wiring must comply with NEC Sect 300.4 I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.

3. ARCH fault breaker needed for all other outlets.

An arc fault breaker differs from a GFCI outlet or circuit breaker in that it detects slow electrical leaks. A slow leak typically occurs when wiring is compromised but not completely shorted. Some studies reveal that electrical wiring issues account for over 150 home fires across the United States *each day*. A slow leak typically occurs when wiring is compromised but not completely shorted. Slow, but still hazardous. An AFCI is a product that is designed to detect a wide range of arcing electrical faults to help reduce the electrical system from being an ignition source of a fire. Conventional overcurrent protective devices do not detect low level hazardous arcing currents that have the potential to initiate electrical fires. **NEC Sect 2310.12 (D) AFCI Protection** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.

4. No means of egress provided, I am disabled, and what am I supposed to do if there is a fire? I cannot utilize this added bath until this is done, and after all my expenditures due to using these contractors, I cannot presently afford this work.

5. Need thermal expansion device on water heater. This is an additional device installed between the cold water pipe and water heater. That provides pressure relief when the tank's volume reaches maximum capacity. Can you envision what happens when heated water can't expand? Hot water everywhere. **2018 IPC 601.1 & 607.3** I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair

6. Need handrails on both sides of ramp. Also need egress from bath shed to ground in case This is also something I cannot presently afford. I ask for \$5,000.00 to cover # 6.

7. There is also the fact the defendants wired the shed, illegally and against code, to a power source. They did this by tying a 10-2 wire into the disconnect box for the heat pump. This caused a circuit overload, which caught this disconnect box on fire. This could have caused severe fire damage to my home. It blew the shed in front wiring, and a new circuit needed be run to that shed. The disconnect box/fuse needed to be replaced. **South Carolina Fire Code,**

NFPA 70, NFPA 110 and NFPA 111. I can furnish invoice that I have had this work done. As well as estimate of funds lost moving my money from stocks to cover this repair.

8. No inspection was garnered, Violation of E3403.2 Inspection Required 321 NEC Code. New electrical work and parts of existing systems affected by new work or alterations shall be inspected by the building official to ensure compliance with the requirements of Chapters 34 through 43.

OTHER DEFECTS IN WORK/PROFESSIONALISM

9. Three doorknobs / locks need be replaced. The Defendants have replaced three knobs/locks the door they created from my bedroom to get to my bath shed, the bath shed door, and my Office shed door. I ask for \$500.00 to have this work completed. That is to replace 3 knob/bolts, and 2 dead bolts.
10. Plaintiff has steadily and faithfully used the services of the Defendants or their previous employer, G&G Construction, while at 4311 Bryant St. Loris, S.C. Prior to this, and when first at current home, both Defendants knew of the Plaintiff through their work with G&G Construction. Plaintiff's disability has been severe since she or her Mother began to utilize these workers. To suffer the nasty, unwarranted, vitriolic, intrusive attacks by Mr. Ard has affected me horridly at a time of pain and medical need. I ask punitive damages are awarded that triple the costs, due to the pain and emotional suffering incurred.
11. The Defendants left refuse and cigarette butts all over my property. Costs of \$100 to have yard cleaned of refuse and cigarette butts. I am not able, and this is known fact. During previous jobs they did not do this.
12. South Carolina Courts hold that builders have an implied duty to perform work to standards, to code and safely. They failed to meet their duty.
13. Opposing Counsel, Mr. Lawrence Smith, holds that his client's repetitive, vulgar, unwarranted attacks, comments, and behavior were not illegal. Plaintiff begs to differ, offering the following as proof:

2019 South Carolina Code of Laws
Title 16 - Crimes and Offenses
Chapter 3 - Offenses Against The Person
Section 16-3-1700. Definitions.

Universal Citation: SC Code § 16-3-1700 (2019)

FILED
Horry County
2023 JUN -3 P 1:01
JENNIFER ELYS
CLERK OF COURT
HORRY COUNTY, SC

Harassment in the second degree may include, but is not limited to, verbal, written, or electronic contact that is initiated, maintained, or repeated. (A) "Harassment in the first degree" means a pattern of intentional, substantial, and unreasonable intrusion into the private life of a targeted person that serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress.

(B) "Harassment in the second degree" means a pattern of intentional, substantial, and unreasonable intrusion into the private life of a targeted person that serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress..

14. Defendant Ard ran into and over things, not in the driveway, but in my yard. Damages of less than \$100. Defendant

Ard even got out of his truck, looked at damage, turned to go to Bath shed and did not inform me, or say a word.

17. The Defendants left refuse and cigarette butts all over my property. Costs of \$100 to have yard cleaned of refuse and cigarette butts. I am not able, and this is known fact. During previous jobs they did not do this.

Plaintiff wishes to resolve these facts, costs and damages through Mediation. Please find enclosed, dated, electronically filed order of Mediation to be complete within 90 days.

The Plaintiff wishes to attempt mediation to resolve all of its disputes with the Defendants and makes the following proposals.

PROPOSALS

- A. That the Defendants compensate Plaintiff for the necessary repairs needed to bring their work to code. Receipts from licensed Plumber and Electrician will be supplied.
- B. That Defendants pay for modifications needed to make their work ADA compliant. These are Reasons for Failed Inspection 4 and 6. Plaintiff asks for \$1500 to cover having this work done.

FILED
Horry County
2022 JAN -3 P 1:03
JENNIE N. ELYS
CLERK OF COURT
HORRY COUNTY, SC

C. During the course of time jobs were performed at 4311 Bryant St. Loris, S.C. Four knobs/locks were changed. Plaintiff only received one key per lock. Door knobs with locks come with two keys, always. Plaintiff requests all knobs/locks be changed by worker of her choice at Defendant's expense, or \$500.00 to cover this work.

D. Fees for Mediation are split. Plaintiff's fee deducted from her settlement.

E. Punitive Damages need be awarded for Plaintiff having to deal with repetitive, vulgar, harassment, in person, by phone, and by text, after working hours and on weekends while having this job done, and voicing concerns over said job, a job which presented extreme dangers to Plaintiff's recent, numerous surgeries. Plaintiff requests three times the amount this job cost her. Opposing counsel, Atty. Lawrence Smith, told the plaintiff verbatim that this verbal harassment was not illegal. Statute differs:

2019 South Carolina Code of Laws
Title 16 - Crimes and Offenses
Chapter 3 - Offenses Against The Person
Section 16-3-1700 B.

(B) "Harassment in the second degree" means a pattern of intentional substantial, and unreasonable intrusion into the private life of a targeted person that serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress.

F. The physical pain, combined with the fear of undoing costly, painful surgeries, that this bath addition was purchased to prevent is an added cost, but there is no way to calculate a number for that.

G. Fees for Mediation be split. Plaintiff's fee deducted from her settlement.

H. Inasmuch as Plaintiff's secondary source of income is dividends from investment; she respectfully requests replacement of monies in interest lost, due to repairs,

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HORRY COUNTY
2024 JAN -3 P 101
RENEE M. ELVIS
CLERK OF COURT
HORRY COUNTY, S.C.

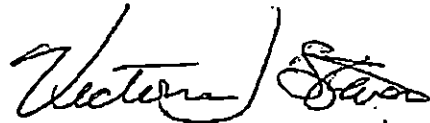
required to utilize the bathroom she paid for which was not to code, therefore unsafe. Debits/ credits to checking will be provided.

COST WORK TO BATH ADDITION

4/8/22	Check # 9188	Charlie Ard	\$6,000.00
4/9/23	Check #3761.	Charlie Ard	\$2,000.00
4/15/22	Check #9200	Charlie Ard	\$5,700.00
4/22/23	Check #7777	Charlie Ard	\$3,250.00
4/27/22	Check #3762	Charlie Ard	\$1,000.00
4/29/22	Check #3764	Charlie Ard	\$2,650.00
5/4/22	Check #3766	Charlie Ard	\$2,250.00
TOTAL			\$22,850.00

I remain,

Yours truly,



Victoria Joy Stevens

FILED
HORRY COUNTY
2024 JAN -3 P 1:01
RENEE H. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

CC: Horry County Clerk of Court

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HORRY COUNTY
2024 JAN -3 P 1:01
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

The Plaintiff wishes to attempt mediation to resolve all of its disputes with the Defendants and makes the following proposals.

PROPOSALS

- I. That the Defendants compensate Plaintiff for the necessary repairs needed to bring their work to code. Receipts from licensed Plumber and Electrician will be supplied.
- J. That Defendants pay for modifications needed to make their work ADA compliant. These are Reasons for Failed Inspection 4 and 6. Plaintiff asks for \$1500 to cover having this work done.
- K. During the course of time jobs were performed at 4311 Bryant St. Loris, S.C. Four knobs/locks were changed. Plaintiff only received one key per lock. Door knobs with locks come with two keys, always. Plaintiff requests all knobs/locks be changed by worker of her choice at Defendant's expense, or \$500.00 to cover this work.
- L. Fees for Mediation are split. Plaintiff's fee deducted from her settlement.
- M. Punitive Damages need be awarded for Plaintiff having to deal with repetitive, vulgar, harassment while having job done, and voicing concerns over said job, a job which presented extreme dangers to Plaintiff's recent, numerous surgeries. Plaintiff requests three times the amount this job cost her. Opposing counsel, Atty. Lawrence Smith, told the plaintiff verbatim that this verbal harassment was not illegal. Statute differs:

2019 South Carolina Code of Laws
Title 16 - Crimes and Offenses
Chapter 3 - Offenses Against The Person
Section 16-3-1700 B.

(B) "Harassment in the second degree" means a pattern of intentional, substantial, and unreasonable intrusion into the private life of a targeted person that — serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress.

- N. The physical pain, combined with the fear of undoing costly, painful surgeries, that this bath addition was purchased to prevent is an added cost, but there is no way to calculate a number for that.
- O. Fees for Mediation be split. Plaintiff's fee deducted from her settlement.
- P. Inasmuch as Plaintiff's secondary source of income is dividends from investment; she respectfully requests replacement of monies in interest lost, due to repairs, required to utilize the bathroom she paid for which was not to code, therefore unsafe. Debits/ credits to checking will be provided.

COST WORK TO BATH ADDITION			
4/8/22	Check # 9188	Charlie Ard	\$6,000.00
4/9/23	Check #3761	Charlie Ard	\$2,000.00
4/15/22	Check #9200	Charlie Ard	\$5,700.00
4/22/23	Check #7777	Charlie Ard	\$3,250.00
4/27/22	Check #3762	Charlie Ard	\$1,000.00
4/29/22	Check #3764	Charlie Ard	\$2,650.00
5/4/22	Check #3766	Charlie Ard	\$2,250.00
TOTAL			\$22,850.00

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2024 JAN -3 P 1:01
RENEE N. ELYS
CLERK OF COURT
HORRY COUNTY, SC

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Postage \$0.90

Total Postage and Fees \$5.25

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for an electronic return receipt, see a retail associate for assistance. To receive a duplicate return receipt for no additional fee, present this USPS®-postmarked Certified Mail receipt to the retail associate.

Restricted delivery service, which provides delivery to the addressee specified by name, or to the addressee's authorized agent.

Adult signature service, which requires the signee to be at least 21 years of age (not available at retail).

Adult signature restricted delivery service, which requires the signee to be at least 21 years of age and provides delivery to the addressee specified by name, or to the addressee's authorized agent (not available at retail).

- To ensure that your Certified Mail receipt is accepted as legal proof of mailing, it should bear a USPS postmark. If you would like a postmark on this Certified Mail receipt, please present your Certified Mail item at a Post Office™ for postmarking. If you don't need a postmark on this Certified Mail receipt, detach the barcoded portion of this label, affix it to the mailpiece, apply appropriate postage, and deposit the mailpiece.

IMPORTANT: Save this receipt for your records.

V. Stevens
4311 Bryant Street
Loris, SC 29569

C.



FILED
Horry County

2024 JAN 23
Horry County Clerk of
RENEE H. EAVIS
CLERK OF COURT
Horry County, SC 29526
Conway, SC 29526

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

IN THE COURT OF COMMON PLEAS

FIFTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens

Plaintiff

Tuesday, December 5, 2023

Vs

Charlie Ard and Wilbur Causey

Defendants

ADR NOTICE

FILE NO. 2022CP2604125

To: Attorney Lawrence Smith
Rivertown Law
908 4h Avenue
Conway, SC 29526-5145

From: Victoria Joy Stevens
4311 Bryant Street
Loris, SC 29569-2676

FILED
HORRY COUNTY
2024 JAN 19 P 12:51
RENEE H. ELYS
CLERK OF COURT
HORRY COUNTY, SC

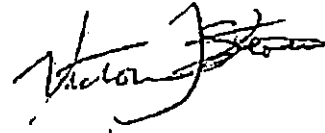
Mr. Smith,

Pursuant to the South Carolina Alternative Dispute Resolution Rules (SCADR), you are required to participate in the following methods of Alternative Dispute Resolution (ADR): mediation or arbitration (binding or non-binding); on or before 300 days from the date of filing of this action. The parties have a right to mutually agree upon the form of ADR and a neutral person(s) to conduct that ADR process. In the event the parties are unable to agree upon the form of ADR, the court hereby designates mediation as the default process of ADR.

The enclosed order of the court electronically signed December 6, 2023, by the Honorable William H.

Seals, Jr. levied mediation within 90 days. I have sent this court document previously, and spoken with your paralegal regarding this. So it is ordered. Your attention is appreciated. I remain,

Yours truly,



Victoria Joy Stevens

Cc: Horry County Clerk of Court

The Honorable William H. Seals, Jr.

FILED
HORRY COUNTY
2024 JAN 19 P 12:51
RENEE N. ELYS
CLERK OF COURT
HORRY COUNTY, SC

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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:

Mediation shall be completed within 90 days.

FILED
Horry County
2022 JAN 19 P 12:51
JANE M. ELYS
CLERK OF COURT
Horry County, SC

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 12/06/2023.

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRCP.

FILED
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2024 JAN 19 P 12:51
RENEE H. ELYS
CLERK OF COURT
HORRY COUNTY, SC



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al
Case Number: 2022CP2604125
Type: Order/Electronic Form 4

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Electronically signed on 2023-12-06 09:52:40 page 3 of 3

FILED
HORRY COUNTY
JAN 19 P 12:51
RENEE N. ELMIS
CLERK OF COURT
HORRY COUNTY, SC

V. Stevens

4311 Bryant St.
Lans, SC 29569

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HORRY COUNTY

2024 JAN 19 P 12:51

RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Clerk of Court
1301 2nd Avenue
Conway, SC
29528

COLUMBIA SC 290



29526-520901



Victoria Joy Stevens

4311 Bryant Street

Loris, S.C. 29568-2676

8435161541

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1301 2nd Avenue
Conway, S.C. 29526

FILED
HORRY COUNTY
2024 FEB 14 P 3:32
REHEE N. ELYS
CLERK OF COURT
HORRY COUNTY, SC

Judge William H. Seals, Jr.
Horry County Clerk of Court
1301 2nd Avenue
Conway, S.C. 29526

February 12, 2024

#2022CP2604125
Attorney Lawrence Smith
Counsel for Defendants Ard & Causey
RiverTown Law
908 4th Avenue
Conway, S.C. 29256
8434885600
Continuance of Court Ordered

Monday,

Case

Re: Petition for

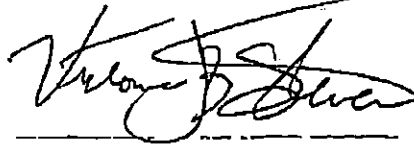
Mediation
of December 4,
2023

Dear Sir,

I seek a Continuance of the Court Ordered Mediation within 90 days filed December 4, 2023 with Horry County Clerk of Court. Counsel of Defendants has been mailed, certified, and called. This scenario is of disadvantage to my health, as the reason for suit was a dangerous, and incomplete, paid for job.

Said job was a disability accommodation. I face harm daily sans accessible bathing facilities. Counsel of Defendants seems determined to go to trial, instead of feasibly discussing remedy to ensure Plaintiff receives that which she paid well for. His Discovery requests are things he, and his clients have access to. Moreover his requests subject this Plaintiff to undue burden by expense, and actions required. Plaintiff does not drive; Plaintiff is post five joint replacements. This is tying up courts and subjecting the Plaintiff to danger. Plaintiff asks the court to levy sanctions upon the Defendants and their Counsel. I remain,

Yours truly,

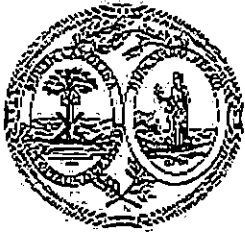


Victoria Joy Stevens

FILED
Horry County
2021 FEB 14 P 3:33
RENEE H. ELVIS
CLERK OF COURT
Horry County, SC

NOTICE OF MOTION SCHEDULING

May 29, 2024



Motion "ADRNOT - ADR/Notice of ADR" for Case: 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard, defendant, et al has been added to the following Motions Roster:

425 - ADR Sanctions Roster - 7/11/2024 - Honorable William H. Seals

(3D)
This hearing of this motion has been scheduled for 7/11/2024 at 9:30 AM.

PLEASE READ CAREFULLY - The ADR/Sanctions roster with the Honorable William Seals presiding is now available on the Judicial website. All parties are required to appear on Thursday, July 11, 2024 at 9:30 am in Courtroom 3-B and show just cause why sanctions should not be imposed for not complying with the mandatory ADR rules for Horry County.

Please e-mail Jennifer Anderson at Anderson.jennifer@horrycountysc.gov ONLY if your case has settled and proper documentation has been filed. To be excused from attending the hearing, please e-file a Proposed Order of Mediation, including the date/time of the mediation and the name of the mediator at least 7 days before the hearing.

For continuances, please e-file a motion together with a proposed order no later than July 5, 2024.

Mail Notice To:	Court Info:
Victoria Joy Stevens 4311 Bryant St Loris, SC 29569	Common Pleas 1301 2Nd Avenue P O Box 677 Conway, SC 29528-9528

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(843)915-5080

Respectfully,

Renee N. Elvis

Renee N. Elvis
Clerk of Court

9489 0090 0027 6609 0715 46

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 07-09-2024 04:36:31 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 07-09-2024 04:35:16 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Event(s):

Order/Order Cover Sheet \$25.00

Document(s) Submitted: Proposed Order/Scheduling Order

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Jul 10 9:52 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Victoria Jay Stevens,

Plaintiff,

vs.

Charles Ard and Wilbur Causey,

Defendant.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

PROPOSED SCHEDULING ORDER

FILE NO.: 2022-CP-26-04125

THIS NOTICE is to notify the Court and all Parties listed above that the following schedule is established for this case.

1. Depositions have been scheduled to be held at the office of Rivertown Law, located at 908 Fourth Avenue, Conway, South Carolina, 29526 on Thursday, July 18, 2024. The deposition of the Plaintiff, Victoria Jay Stevens will begin at 10:00 a.m.
2. Mediation is scheduled on August 28, 2024, and will begin at 10:00 a.m. It will be held at the office of Mullins Law Firm, which is located at 1312 Madison Drive, North Myrtle Beach, South Carolina, 29582. The Mediator is Attorney Jarrod Ownbey.

Honorable William H. Seals, Jr
Circuit Court Judge

Dated: _____
Conway, South Carolina



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

Type: Order/Scheduling Order

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 07-11-2024 08:40:31 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 07-11-2024 08:40:26 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order/Scheduling Order Order/Scheduling Order

Filed by or on behalf of: William H. Seals

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Jul 11 8:40 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

NOTICE OF MOTION SCHEDULING

September 06, 2024



Motion "ADRNOT - ADR/Notice of ADR" for Case: 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard , defendant, et al has been added to the following Motions Roster:

431 - ADR Sanctions Roster - 10/22/2024 - Honorable William H. Seals
(3B)

This hearing of this motion has been scheduled for 10/22/2024 at 9:30 AM.

PLEASE READ CAREFULLY - The ADR/Sanctions roster with the Honorable William Seals presiding is now available on the Judicial website. All parties are required to appear on Tuesday, October 22, 2024 at 9:30 AM in Courtroom 3-B and show just cause why sanctions should not be imposed for not complying with the mandatory ADR rules for Horry County.

Please e-mail Jennifer Anderson at Anderson.jennifer@horrycountysc.gov ONLY if your case has settled and proper documentation has been filed. To be excused from attending the hearing, please e-file a Proposed Order of Mediation, including the date/time of the mediation and the name of the mediator at least 7 days before the hearing..

For continuances, please e-file a motion together with a proposed order no later than 10/11/2024.

Mail Notice To:
Victoria Joy Stevens 4311 Bryant St Loris, SC 29569

Court Info:
Common Pleas 1301 2Nd Avenue P O Box 677 Conway, SC 29528-9528

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(843)915-5080

Respectfully,

Renee N. Elvis

Renee N. Elvis
Clerk of Court

9489 0090 0027 6282 5111 93

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 09-09-2024 02:09:48 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 09-09-2024 02:09:34 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Notice/Notice of Hearing and Service
Notice/Notice of Hearing and Service

Filed by or on behalf of: Jennifer Anderson

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Sep 09 2:16 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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:

Mediation is scheduled on 8/28/2024 at 10:00 AM with Attorney Jarrod Ownby. Case excused from the 10/22/2024 ADR Sanctions Roster.

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 09/26/2024 .

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

Type: Order/Electronic Form 4

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 09-26-2024 02:46:15 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 09-26-2024 02:46:10 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order/Electronic Form 4 - ADR Order/Electronic
Form 4

Filed by or on behalf of: William H. Seals

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must
be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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:

Mediation scheduled on 11/6/2024 at 10:00 AM with Attorney Jarrod Ownbey. Case Excused from the 10/22/2024 ADR Sanctions Roster.

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 10/17/2024 .

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

Type: Order/Electronic Form 4

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Electronically signed on 2024-10-17 22:41:53 page 3 of 3

ELECTRONICALLY FILED - 2024 Oct 18 2:06 PM - Horry - COMMON PLEAS - CASE#2022CP2604125

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 10-18-2024 02:06:49 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 10-18-2024 02:06:44 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order/Electronic Form 4 - ADR Order/Electronic
Form 4

Filed by or on behalf of: William H. Seals

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must
be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Oct 18 2:06 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

Stevens v Ard (Atty Lawrence Smith Rivertown Law)
2024 CP 2604128

Tuesday 10/22/24

Take to Clerk of Court

I received 10/19

FILED
HORRY COUNTY
2024 OCT 22 8:56
PENEE N. EDWARDS
CLERK OF COURT
HORRY COUNTY, SC

Rivertown Law, Attorney

Smith, correspondence that

mediation was rescheduled for Nov 6,

2024. I called Rivertown Law 10/21/24,

let them know that I have an appointment

at Storm Eye Institute, MUSC that day.

I have been waiting for a couple of

months to see a cornea specialist. This

is a crucial medical appointment, although I
left a detailed message Mr Smith never
returned my call. Victoria Stevens

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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:

This case appeared on the 10/22/2024 ADR Sanctions roster. Case is Exempt from mediation.

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 10/23/2024 .

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCF.



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

Type: Order/Electronic Form 4

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 10-23-2024 01:55:37 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 10-23-2024 01:55:29 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order/Electronic Form 4 - Mediation Exempt
Order/Electronic Form 4

Filed by or on behalf of: William H. Seals

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Oct 23 1:55 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

NOTICE OF ADR

Victoria Joy Stevens

2022CP2604125

PLAINTIFF(S)

Filing Date: June 27, 2022

Vs

Charlie Ard
Wilbur Causey

DEFENDANT(S)

Pursuant to the South Carolina Alternative Dispute Resolution Rules (SCADR), you are required to participate in the following methods of Alternative Dispute Resolution (ADR): mediation or arbitration (binding or non-binding); on or before 300 days from the date of filing of this action. The parties have a right to mutually agree upon the form of ADR and a neutral person(s) to conduct that ADR process. In the event the parties are unable to agree upon the form of ADR, the court hereby designates mediation as the default process of ADR. In the event the parties are unable to agree upon a mediator, the court hereby appoints

Jesse Ronald Jones Jr., 171 Church Street, Suite 120C, Charleston, SC 29401, Phone (843) 714-2535

to serve as mediator. In the event the aforementioned mediator has a conflict of interest or is unable to serve, the alternate mediator is

Charles J. Hodge, Hodge & Langley Law Firm, PC, PO Box 2765, Spartanburg, SC 29304-2765, Phone (864) 585-3873

The parties and/or their lawyers shall contact the court-appointed mediator directly regarding scheduling and payment of the court-mandated fee.

A Rule to Show Cause why sanctions should not be imposed may be issued in all cases that fail to file a Proof of ADR or Exemption form indicating evidence of participation in or exemption from an ADR process within 300 days from the date of filing of the action or 90 days from the date of this notice April 23, 2023.

Date: January 23, 2023

Notice of this Order was given by First Class Mail, E-mail, Fax or by the E-Filing Notice of Electronic Filing (NEF). Pro-Se parties were notified by first class mail on 01/23/2023

Plaintiff Attorney:

Victoria Joy Stevens
4311 Bryant St
Loris, SC 29569

Defendant Attorney:

Lawrence Bradley Smith
908 4Th Avenue
Conway, SC 29526

ADR Coordinator

Cecilia Cessna
(843) 915-6803
CESSNAC@horrycounty.org

NOTICE OF CASE SCHEDULING

November 14, 2024



Case 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard ,
defendant, et al has been added to the following Court Roster:

Roster ID: 227 - CP JURY TRIALS (12/16/24-12/20/24) Honorable B.
Culbertson/D. Caraker

This case has been assigned as priority 19 of 51 cases scheduled for the court period of
12/16/2024 through 12/20/2024

ALL REQUEST FOR CONTINUANCES/SCHEDULING MUST BE FILED WITH THE
HORRY COUNTY CLERK OF COURT NO LATER THAN MONDAY, DECEMBER 9
2024 BY NOON. IF YOUR CASE IS SETTLED, FILE A STIPULATION OF DISMISSAL
WITH THE COURT.

The Jury Trial Roster starting Monday, December 16, 2024 with the Honorable Benjamin
Culbertson and the Honorable David Caraker is now available on the sccourts.org website.
The roster meeting will start at 9:30 am in courtroom 3B. The jurors will report at 10:00 am
in the jury pool room on the first floor. Please contact Sheila Harrelson, Common Pleas Jury
Trial Coordinator 843-915-5075 or via email harrelsh@horrycountysc.gov with any questions
or please email with any settlements that relate to this docket.

Mail Notice To:

Victoria Joy Stevens
4311 Bryant St
Loris, SC 29569

Court Info:

Common Pleas
1301 2Nd Avenue
P.O.Box 677
Conway, SC 29528-9528

If you have any questions regarding the scheduling of this case, please contact the courts at:

(843)915-5080

Respectfully,

Renee N. Elvis
Clerk of Court

9489 0090 0027 6648 2749 46

NOTICE OF CASE SCHEDULING

November 14, 2024



Case 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard ,
defendant, et al has been added to the following Court Roster:

Roster ID: 227 - CP JURY TRIALS (12/16/24-12/20/24) Honorable B.
Culbertson/D. Caraker

This case has been assigned as priority 19 of 51 cases scheduled for the court period of
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ALL REQUEST FOR CONTINUANCES/SCHEDULING MUST BE FILED WITH THE
HORRY COUNTY CLERK OF COURT NO LATER THAN MONDAY, DECEMBER 9
2024 BY NOON. IF YOUR CASE IS SETTLED, FILE A STIPULATION OF DISMISSAL
WITH THE COURT.

The Jury Trial Roster starting Monday, December 16, 2024 with the Honorable Benjamin
Culbertson and the Honorable David Caraker is now available on the sccourts.org website.
The roster meeting will start at 9:30 am in courtroom 3B. The jurors will report at 10:00 am
in the jury pool room on the first floor. Please contact Sheila Harrelson, Common Pleas Jury
Trial Coordinator 843-915-5075 or via email harrelsh@horrycountysc.gov with any questions
or please email with any settlements that relate to this docket.

Mail Notice To:

Victoria Joy Stevens
4311 Bryant St
Loris, SC 29569

Court Info:

Common Pleas
1301 2Nd Avenue
P O Box 677
Conway, SC 29528-9528

If you have any questions regarding the scheduling of this case, please contact the courts at:

(843)915-5080

Respectfully,

Renee N. Elvis
Clerk of Court

9489 0090 0027 6648 2749 46

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 12-05-2024 09:20:18 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 12-05-2024 09:20:06 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Notice/Notice of Hearing Notice/Notice of Hearing

Filed by or on behalf of: Sheila Harrelson

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Dec 05 9:30 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA
COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff,

vs.

Charlie Ard and Wilbur Causey,

Defendant.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

**DEFENDANTS' MOTION FOR
CONTINUANCE**

FILE NO.: 2022-CP-26-04125

Comes now the Defendant, by counsel, and moves the Court to continue the trial set herein, and on support thereof alleges and says:

1. That the above-captioned matter is number 19 on the Jury trial roster for December 16, 2024, to December 20, 2024.
2. On December 11, 2024, Defendant Charlie Ard was rushed to McLeod Loris Medical Center. Mr. Ard is bleeding into his stomach, swelling around his heart, along with other related medical issues. As of December 12, 2024, he received over 3 pints of blood. Attached to this motion is a medical excuse from McLeod Loris Medical Center.
3. Based upon information and belief, Mr. Ard is not likely to be discharged from McLeod Loris Medical Center next week.

WHEREFORE, Defendant moves this Court for an Order Continuing this case to allow for Mr. Ard's recovery.

RIVERTOWN LAW

s/L. Bradley Smith

L. Bradley Smith, Esquire

SC Bar #73192

Attorney for Defendant, Charlie Ard

Attorney for Defendant, Wilbur Causey

908 Fourth Avenue

Conway, South Carolina 29526

Phone: (843) 488-5600


40438934

STATE OF SOUTH CAROLINA
COUNTY OF GEORGETOWN

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens,

Plaintiff,

vs.

Charles Ard and Wilbur Causey,

Defendants.

AFFIDAVIT OF MAILING

Docket No.: 2022-CP-22-04125

Personally appeared Ann Roschy, an employee of Rivertown Law and attorney L. Bradley Smith, attorney for the Defendant, who states she served the Plaintiff, Victoris Joy Stevens, with a letter dated December 13, 2024 with notification of the hearing scheduled for the week of December 16, 2024 through December 20, 2024 being continued, by mailing:

☒ First class mail

☒ Certified mail

☒ restricted delivery

☒ return receipt requested

in the United States Mail, with proper postage attached and receipt attached (if applicable), on December 13, 2024 addressed as follows:

Victoria Joy Stevens
4311 Bryant Street
Longs, South Carolina 29569


Affiant

Sworn to before me this
13th day of December 2024.

Melissa Hersey
Notary Public of South Carolina
Printed Name: Melissa Hersey
My Commission expires: 03/28/2029

Certificate of Electronic Notification

Recipients

Lawrence Smith, - Notification transmitted on 12-13-2024 10:01:11 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 12-13-2024 09:59:42 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Motion/Continuance
Proposed Order/Continuance

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Dec 13 10:56 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 12-13-2024 10:50:32 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 12-13-2024 10:50:09 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Affidavit/Affidavit of

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2024 Dec 13 10:59 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff,

vs.

Charlie Ard and Wilbur Causey,

Defendant.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

ORDER OF CONTINUANCE

FILE NO.: 2022-CP-26-04125

This Order of Continuance comes before the Court at the request of the attorney for the Defendant Charlie Ard and Defendant Wilbur Causey. A hearing is currently scheduled for the week of December 16, 2024, to December 20, 2024.

The Defendants are requesting continuance due to the fact that the Defendant, Charlie Ard, was rushed to McLeod Loris Medical Center due to bleeding into his stomach, swelling around his heart and other related medical issues. Defendant Ard is not likely to be discharged from McLeod Loris Medical Center next week.

IT IS THEREFOR ORDERED, ADJUDGED AND DECREED that this action shall be continued;

AND IT IS SO ORDERED THIS _____ DAY OF DECEMBER 2024.

Honorable Judge of the Court of Common Pleas
Fifteenth Judicial Circuit
Conway, South Carolina



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

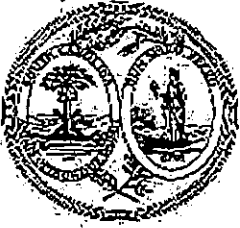
Type: Order/Continuance

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

NOTICE OF CASE SCHEDULING

January 15, 2025



Case 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard, defendant, et al has been added to the following Court Roster:

Roster ID: 247 - CP JURY TRIALS (2/18/2025-02/21/2025) Honorable B. Alex Hyman 3B

This case has been assigned as priority 8 of 24 cases scheduled for the court period of 2/18/2025 through 2/21/2025.

ALL REQUEST FOR CONTINUANCES/SCHEDULING MUST BE FILED WITH THE HORRY COUNTY CLERK OF COURT NO LATER THAN MONDAY, FEBRUARY 10, 2024. IF YOUR CASE IS SETTLED, FILE A STIPULATION OF DISMISSAL WITH THE COURT.

The Jury Trial Roster starting Tuesday, February 18, 2025 with the Honorable B. Alex Hyman is now available on the sccourts.org website. The roster meeting will start at 9:30 am in courtroom 3B. The jurors will report at 10:00 am in the jury pool room on the first floor. Please contact Sheila Harrelson, Common Pleas Jury Trial Coordinator 843-915-5075 or via email harrelsh@horrycountysc.gov with any questions or please email with any settlements that relate to this docket.

HORRY COUNTY COURTHOUSE, 1301 2ND AVE, CONWAY SC 29526

Mail Notice To:

Victoria Joy Stevens
4311 Bryant St

Loris, SC 29569

Court Info:

Common Pleas
1301 2Nd Avenue
P O Box 677
Conway, SC 29528-9528

If you have any questions regarding the scheduling of this case, please contact the courts at:

(843)915-5080

Respectfully,

A handwritten signature in cursive script, appearing to read "Renee N. Elvis".

Renee N. Elvis
Clerk of Court

9489 0090 0027 6667 2346 06

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 01-29-2025 11:39:03 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 01-29-2025 11:38:43 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Notice/Notice of Hearing Notice/Notice of Hearing

Filed by or on behalf of: Sheila Harrelson

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2025 Jan 29 11:41 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 12-23-2024 12:30:51 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 12-23-2024 12:30:44 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order of Continuance

Filed by or on behalf of: William H. Seals

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

- #1) Photo of water heater under breaker box
- #2) Costs of printing of court docs.
- #3) Copies of checks / checks in statements received by Defendant
- #4) Inspection of disputed work
- #5) numerous copies of orthopedic medical
- #6) receipt for repair uninsulated pipes
- #7) paid receipt for #6
- #8) Diagnostic fee for illegal wiring
- #9) Certified Electrician's statement regarding illegal wiring
- #10) Bill for rewiring bath, and adding omissions required by law.
- #11) Certified Electrician's bill for correcting illegal wiring.
- #12) Copy of #6
- #13) bill for moving / housing hot water heater
- #14) Reasons for failed inspection.

FILED
Horry County
2025 FEB 14 P 1:53
RENEE N. ELVIS
CLERK OF COURT
Horry County, SC

2022 CP 260 4126
Victoria J. Stewart
4311 Bryant St
Longs, SC 29549-2674
843 614-1841

2022 CP 260 4125

#14) REASONS FOR FAILED INSPECTION

1. GFCI breaker within 6' of sink and shower.

The National Electric Code requires Ground Fault Circuit Interrupters in wet areas, inclusive of bathrooms. Just about every region has some sort of requirement for ground-fault detection, and thousands of lives have been saved around the globe. The GFCI is designed to protect people from severe or fatal electric shocks but because a GFCI detects ground faults, it can also prevent some electrical fires and reduce the severity of other fires by interrupting the flow of electric current. The Defendants left GFCI breakers out when installing my bathroom. Mr. Charlie Ard, in fact, told this plaintiff my bath was ready to use.

After research this was learned: The NEC requires that all outlet receptacles in a bathroom be GFCI protected. Outlet circuit must be 20 amps: The outlets in a bathroom should be served by a 20-amp circuit, separate from the lighting circuit, to provide power items such as curling irons, razors, and hairdryers.

According to the National Electric Code (NEC), it requires a minimum of one GFCI-protected outlet per bathroom. The national recommendation is more than one, like two or three. You get to decide how many outlets you want to protect but **have to have a minimum of one in your bathroom.**

GFCIs are a type of circuit breaker used to shut off power when there is an imbalance between the incoming and outgoing current. The main purpose of GFCI outlets is to prevent the risk of electrical shock from happening. Barely noticeable in the bathroom, a GFCI outlet can prevent shocks and electrocution.

2. Protect NM at water Heater.

Runs of NM cable must be supported at least every 54 inches. They also must be secured within 12 inches of an electrical box that includes a cable clamp or within eight inches of a box or enclosure without a cable clamp.

Without conduit, wires can get damaged, which can lead to electrical fires and shocks. The insulation on unprotected wires can wear off over time, exposing live wires. Properly installed conduit makes inspection, maintenance, and repairs much easier.

3. ARCH fault breaker needed for all other outlets.

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St-Loris SC 29569-2676

An arc fault breaker differs from a GFCI outlet or circuit breaker in that it detects slow electrical leaks. A slow leak typically occurs when wiring is compromised but not completely shorted. Some studies reveal that electrical wiring issues account for over 150 home fires across the United States *each day*. A slow leak typically occurs when wiring is compromised but not completely shorted. Slow, but still hazardous. An AFCI is a product that is designed to detect a wide range of arcing electrical faults to help reduce the electrical system from being an ignition source of a fire. Conventional overcurrent protective devices do not detect low level hazardous arcing currents that have the potential to initiate electrical fires.

4.No means of egress provided per R301.1

5.Need thermal expansion device on water heater. This work done by Andy Bisognia, invoice available.

6.Need handrails on both sides of ramp.

7. There is also the fact the defendants wired, illegally and against code,tying a 10-2 wire into the disconnect box for the heat pump. This caused a circuit overload, which caught the disconnect on fire. This could have caused severe fire damage to my home. It blew the shed in front wiring, and a new circuit needed be run to that shed. The disconnect box/fuse needed to be replaced.

I will file suit if these defects are not repaired,

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

REASONS FOR FAILED INSPECTION

1. GFCI breaker within 6' of sink and shower.

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Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

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4. No means of egress provided per R301.1
5. Need thermal expansion device on water heater.
6. Need handrails on both sides of ramp.

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

City of Loris

South Carolina

Inspection Information

Permit #: 626

Permit Date: 02/22/2022

Inspection
Date: 05/19/2022

Permit Type:

Inspection
Type: Final InspectionRequested
By: Home owner

Contact Info:

Scheduled
Date: 05/19/2022Scheduled
Time: 00:00Completed
Date: 05/19/2022

Description: Need; 1. GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault breaker needed for all other outlets 4. No means of egress provided per R301.1 5. Need thermal expansion device on water heater 6. Need handrail on both sides of ramp.

Inspection
Status: Failed

Assigned To: Jimmy Prince

Time In: 00:00

Time Out: 00:00

Hours: 0.0

Notes

05/27/2022 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER
05/08/2023 INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER

Property Information

Parcel#: 17614030023

Victoria Joy Stevens

4311 Bryant St

Loris

Zoning: MULOt: Block:

Victoria Joy Stevens

4311 Bryant St

Loris, SC 29569

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

Loris Print & Ship
4251 Main St
LORIS, SC 29569
Phone: 843-756-7447 | Fax: 843-633-2019

#2 cost of printing
cont docs

Invoice # 35198 | Total Due: \$0.00 | Due Date: Paid | Page: 1

Bill To:

Invoice Date: February 12, 2025
Customer ID: 0

QUANTITY	DESCRIPTION	PRICE	EXTENDED
4	PRINT CHARGE	\$2.00	\$8.00
1	STAMPER #2260	\$39.00	\$39.00 TX
1	LABOR	\$30.00	\$30.00
1	Document Finishing	\$10.00	\$10.00
89	COPY LTR COLOR	\$0.31	\$27.59 TX
	Regular: .46 Saved: 13.35		

I Curtis Russ completed this for Victoria Stevens.

Workstation: 25 - Auxillary Workstation1
Notes:

Subtotal: \$114.59
Sales Tax: \$5.33
Total Sale: \$119.92
Deposit: \$119.92
Total Due: \$0.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

Loris Print and Ship

Lori Print and Ship 0089
4251 Main St
Loris, SC 29569

Transaction
10480287-7532

Date
02/12/2025 • 01:31 PM

Result

Auth Code

Transaction Method

Sale

STEVENS/VICTORIA

Cardholder Name

XXXX-XXXX-XXXX-4822

Card Type

VISA

1 x Quick Item

\$124.72

Subtotal

\$124.72

Total

\$124.72

Chip Read

XXXXXXXXXX6426

Method

MID

TID

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

002025E278

>253271916<
First Palmetto Bank #029
2022-04-15
0029265378
Batch 318767104

04/15/2022 12:06 PM
Account 565708656
Receipt

5,700.00

#3) copies of checks / checks to in statements
received by Defendant

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

060019200

April 15, 2022

REMITTER: VICTORIA JOY STEVENS

**** Five Thousand Seven Hundred and 00/100****

\$ 5,700 00

CHARLIE ARD

MEMO:

060019200 253271916 56 5708656 009

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St. Lotts SC 29569-2676

2

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM



FIRST PALMETTO BANK
Since 1904
Camden, South Carolina

OFFICIAL CHECK

No. 060019200

April 15, 2022

AMOUNT

\$ 5,700.00

REMITTER: VICTORIA JOY STEVENS

**** Five Thousand Seven Hundred and 00/100 ****

PAY TO THE ORDER OF CHARLIE ARD

MEMO:

VOID AFTER 180 DAYS

VALID VAL
D VALID VALI
D VALID VALI
D VALID VALI
D VALID VALI

Charlie Ard
AUTHORIZED SIGNATURE

⑈060019200⑈ ⑆253271916⑆ 56⑈5708656⑈

Details on Back. Security Features Included



FIRST PALMETTO BANK
P.O. Box 861 Camden, SC 29021
www.firstpalmetto.com

Statement Ending 04/15/2022

Page 4 of 4

DEBIT TRANSACTION FORM DATE 3/22/22

ACCOUNT NAME Victoria Stevens

PREPARED BY [Signature]

CUSTOMER SIGNATURE [Signature]

\$ 100.00

045

2305390348

#0000 03/22/2022 \$100.00

DEBIT TRANSACTION FORM DATE 3/25/22

ACCOUNT NAME Victoria Stevens

PREPARED BY [Signature]

CUSTOMER SIGNATURE [Signature]

\$ 200.00

045

2305390348

#0000 03/25/2022 \$200.00

DEBIT TRANSACTION FORM DATE 4/1/22

ACCOUNT NAME Victoria J. Stevens

PREPARED BY [Signature]

CUSTOMER SIGNATURE [Signature]

\$ 300.00

045

2305390348

#0000 04/01/2022 \$300.00

DEBIT TRANSACTION FORM DATE 4/8/22

ACCOUNT NAME Victoria Joy Stevens

PREPARED BY [Signature]

CUSTOMER SIGNATURE [Signature]

\$ 6000.00

045

2305390348

#0000 04/08/2022 \$6,000.00

DEBIT TRANSACTION FORM DATE 4/8/22

ACCOUNT NAME Victoria J. Stevens

PREPARED BY [Signature]

CUSTOMER SIGNATURE [Signature]

\$ 100.00

045

2305390348

#0000 04/08/2022 \$100.00

DEBIT TRANSACTION FORM DATE 4/12/22

ACCOUNT NAME Victoria Stevens

PREPARED BY [Signature]

CUSTOMER SIGNATURE [Signature]

\$ 150.00

045

2305390348

#0000 04/12/2022 \$150.00

DEBIT TRANSACTION FORM DATE 4/15/22

ACCOUNT NAME Victoria Stevens

PREPARED BY [Signature]

CUSTOMER SIGNATURE [Signature]

\$ 5700.00

045

2305390348

#0000 04/15/2022 \$5,700.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LORIS, SC 29553-1541

3/1/22

3741

EXPENSE

Pay to the Order of Plantation Brothers Supply \$ 208.00

First Palmetto Bank

#3741 03/30/2022 \$208.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LORIS, SC 29553-1541

3/22/22

3743

EXPENSE

Pay to the Order of Rich Transitions \$ 250.00

First Palmetto Bank

#3743 04/04/2022 \$250.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LORIS, SC 29553-1541

4/4/23

3761

EXPENSE

Pay to the Order of Charlie's Art \$ 2,000.00

First Palmetto Bank

#3761 04/04/2022 \$2,000.00

Check #s
3761 - 2000.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29553-1541

1580
6000
2000
5700
28,750

Debit 4/8/22 6000.00
3761 2000.00
Debit 4/15/22 5700.00

28,750



FIRST PALMETTO BANK
P.O. Box 861 Camden, SC 29021
www.firstpalmetto.com

Statement Ending 05/13/2022

Page 4 of 4

DEBIT TRANSACTION FORM DATE 4/20/22

ACCOUNT NAME Victoria Stevens

ISSUED BY [Signature]

CUSTOMER SIGNATURE [Signature] \$ 100.00

045

2305390348

#0000 04/20/2022 \$100.00

DEBIT TRANSACTION FORM DATE 4-22-22

ACCOUNT NAME Victoria Stevens

ISSUED BY [Signature]

CUSTOMER SIGNATURE [Signature] \$ 3,250.00

045

2305390348

#0000 04/22/2022 \$3,250.00

The Image for this Item could not be located

#0000 04/28/2022 \$140.00

DEBIT TRANSACTION FORM DATE 5-10-22

ACCOUNT NAME Victoria Stevens

ISSUED BY [Signature]

CUSTOMER SIGNATURE [Signature] \$ 100.00

045

2305390348

#0000 05/10/2022 \$100.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29021-2576

3568

4/18/22

Pay to the Order of Charles A. Stevens \$ 100.00

First Palmetto Bank

#3568 04/18/2022 \$100.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29021-2576

3744

5/2/22

Pay to the Order of Charles A. Stevens \$ 123.00

First Palmetto Bank

#3744 05/02/2022 \$123.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29021-2576

3762

4/27/22

Pay to the Order of Charles A. Stevens \$ 1,000.00

First Palmetto Bank

#3762 04/27/2022 \$1,000.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29021-2576

3764

4/29/22

Pay to the Order of Charles A. Stevens \$ 2,650.00

First Palmetto Bank

#3764 04/29/2022 \$2,650.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29021-2576

3765

5/4/22

Pay to the Order of Charles A. Stevens \$ 100.00

First Palmetto Bank

#3765 05/04/2022 \$100.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29021-2576

3766

5/4/22

Pay to the Order of Charles A. Stevens \$ 2,250.00

First Palmetto Bank

#3766 05/04/2022 \$2,250.00

3762 1000.00
3764 2600.00
3766 2250.00
5900.00
Debit 9280.00

15,050

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Louis SC 29569-2676

>253271916<
First Palmetto Bank #029
2022-04-22
0029909730
Batch 319763376

04/22/2022 2:18 PM
Account 565708656
Receipt

1,250.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

>253271916<
First Palmetto Bank #029
2022-04-22
0029909730
Batch 319763376

04/22/2022 2:18 PM
Account 565708656
Receipt

3,250.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

0029917808

>253271916<
First Palmetto Bank #029
2022-04-22
0029917808
Batch 319774366

04/22/2022 3:01 PM
Br# 29 Tr#2902 Seq# 59
Account 565708656
On Us Check

3,250.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

>253271916<
First Palmetto Bank #029
2022-04-08
0029667211
Batch 317779685

04/08/2022 1:42 PM
Br# 29 Tr#2902 Seq# 41
Account 565708656
On Us Check

6,000.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

0029667211

Charles O. O. O.

①

①

u

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

4311 Bryant St Loris SC 29569-2676

(843) 516-1541
Victoria Joy Stevens



0029299475

>253271916<
First Palmetto Bank #029
2022-04-15
0029299475
Batch 318808225

04/15/2022 1:55 PM
Br# 29 Tlr#2901 Seq# 38
Account 565708656
On Us Check

5,700.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Lotts SC 29569-2676

6000
5700
2022
2022

Charles W. B.

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM



FIRST PALMETTO BANK

Since 1904
Camden, South Carolina

OFFICIAL CHECK

No. 060019198

April 08, 2022

AMOUNT

\$ 6,000 00

REMITTER: VICTORIA J. STEVENS

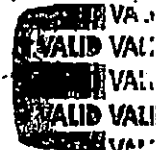
**** Six Thousand and 00/100****

PAY TO THE ORDER OF

CHARLIE ARD

VOID AFTER 180 DAYS

MEMO:



Susan Winborn
Carley Meyler
AUTHORIZED SIGNATURE

⑈060019198⑈ ⑆253271916⑆ 56⑈5708656⑈

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

Details on Back

Security Features Included

>253271916<
First Palmetto Bank #029
2022-04-08
0029667211
Batch 317779685

04/08/2022 1:42 PM
Br# 29 Tr#2902 Seq# 41
Account 565708656
On Us Check

6,000.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER, HEAT SENSITIVE ICON AND FOIL HOLOGRAM



FIRST PALMETTO BANK

Since 1904

Camden, South Carolina

OFFICIAL CHECK

No. 060019200

April 15, 2022

AMOUNT

\$ 5,700.00

REMITTER: VICTORIA JOY STEVENS

**** Five Thousand Seven Hundred and 00/100****

PAY TO THE ORDER OF CHARLIE ARD

MEMO:

VOID AFTER 180 DAYS

VALID VAL
D VALID VAL
D VALID VAL
D VALID VAL
D VALID VAL

Charlie Ard
AUTHORIZED SIGNATURE

060019200 1253271916 56 5708656

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

Details on Back. Security Features Included

0029299475

>253271916<
First Palmetto Bank #029
2022-04-15
0029299475
Batch 318808225

04/15/2022 1:55 PM
Br# 29 Tr#2901 Seq# 38
Account 565708656
On Us Check

5,700.00

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

Charles CB



FIRST PALMETTO BANK
P.O. Box 861 Camden, SC 29021
www.firstpalmetto.com

Statement Ending 04/15/2022

Page 1 of 4

RETURN SERVICE REQUESTED

VICTORIA JOY STEVENS
4311 BRYANT ST
LORIS SC 29569-2676

4311 Bryant St Loris SC 29569-2676
(843) 516-1541
Victoria Joy Stevens

Managing Your Accounts

Phone Number (843) 756-1000
Mailing Address 4311 Main St
Loris, SC 29569
Online Access www.firstpalmetto.com

Summary of Accounts

Account Type	Account Number	Ending Balance
SENIOR CHECKING	XXXXXX0348	\$20,209.22

SENIOR CHECKING-XXXXX0348

Account Summary

Date	Description	Amount
03/16/2022	Beginning Balance	\$45,990.73
	3 Credit(s) This Period	\$807.50
	17 Debit(s) This Period	\$26,589.01
04/15/2022	Ending Balance	\$20,209.22

Interest Summary

Description	Amount
Annual Percentage Yield Earned	0.05%
Interest Days	31
Interest Earned	\$1.50
Interest Paid This Period	\$1.50
Interest Paid Year-to-Date	\$6.69

Account Activity

Post Date	Description	Debits	Credits	Balance
03/16/2022	Beginning Balance			\$45,990.73
03/18/2022	BB&T BANKCARD PHONEPYMNT 24595373	\$2,010.95		\$43,979.78
03/18/2022	GRACELANDPROPERT PURCHASE VICTORIA JOY ST	\$5,871.00		\$38,108.78
03/22/2022	CHECK	\$100.00		\$38,008.78
03/25/2022	PRINCIPAL FINANC DV01DD2203 CXXXXXX0878PFG		\$64.00	\$38,072.78
03/25/2022	CHECK	\$200.00		\$37,872.78
03/30/2022	CHECK # 3741	\$208.00		\$37,664.78
04/01/2022	SSA TREAS 310 XXSOC SEC XXXXX7957A SSA		\$742.00	\$38,406.78
04/01/2022	CHECK	\$300.00		\$38,106.78
04/01/2022	CHASE CREDIT CRD EPAY 5867713218	\$790.53		\$37,316.25
04/04/2022	CHECK # 3761	\$2,000.00		\$35,316.25
04/04/2022	CHECK # 3743	\$250.00		\$35,066.25
04/08/2022	CHECK	\$100.00		\$34,966.25
	CHECK	\$6,000.00		\$28,966.25
	MSP INS. PREM. 7656415618	\$223.30		\$28,742.95
		\$150.00		\$28,592.95
	SERV ELECT PYMT ***** 7161	\$300.00		\$28,292.95
	SERV ELECT PYMT ***** 1484	\$1,385.23		\$26,907.72
		\$5,700.00		\$21,207.72



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Statement Ending 04/15/2022

Page 3 of 4

SENIOR CHECKING-XXXXX0348 (continued)

Account Activity (continued)

Post Date	Description	Debits	Credits	Balance
04/15/2022	CHASE CREDIT CRD EPAY 5897054601	\$1,000.00		\$20,207.72
04/15/2022	INTEREST		\$1.50	\$20,209.22
04/15/2022	Ending Balance			\$20,209.22

Checks Cleared

Check Nbr	Date	Amount	Check Nbr	Date	Amount	Check Nbr	Date	Amount
0	03/22/2022	\$100.00	0	04/08/2022	\$6,000.00	3743*	04/04/2022	\$250.00
0	03/25/2022	\$200.00	0	04/12/2022	\$150.00	3761*	04/04/2022	\$2,000.00
0	04/01/2022	\$300.00	0	04/15/2022	\$5,700.00			
0	04/08/2022	\$100.00	3741*	03/30/2022	\$208.00			

* Indicates skipped check number

Daily Balances

Date	Amount	Date	Amount	Date	Amount
03/18/2022	\$38,108.78	04/01/2022	\$37,316.25	04/12/2022	\$28,592.95
03/22/2022	\$38,008.78	04/04/2022	\$35,066.25	04/14/2022	\$26,907.72
03/25/2022	\$37,872.78	04/08/2022	\$28,966.25	04/15/2022	\$20,209.22
03/30/2022	\$37,664.78	04/11/2022	\$28,742.95		

Overdraft and Returned Item Fees

	Total for this period	Total year-to-date
Total Overdraft Fees	\$0.00	\$0.00
Total Returned Item Fees	\$0.00	\$0.00

Victoria Joy Stevens
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Statement Ending 04/15/2022

Page 4 of 4

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St. Louis SC 29369-2676

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
DATE: 3/22/22
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$ 100.00
045
2305390348
#0000 03/22/2022 \$100.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
DATE: 3/25/22
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$ 200.00
045
2305390348
#0000 03/25/2022 \$200.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria J. Stevens
DATE: 4/1/22
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$ 300.00
045
2305390348
#0000 04/01/2022 \$300.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Joy Stevens
DATE: 4/8/22
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$ 6,000.00
045
2305390348
#0000 04/08/2022 \$6,000.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria J. Stevens
DATE: 4/8/22
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$ 100.00
045
2305390348
#0000 04/08/2022 \$100.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
DATE: 4/12/22
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$ 150.00
045
2305390348
#0000 04/12/2022 \$150.00

DEBIT TRANSACTION FORM
ACCOUNT NAME: Victoria Stevens
DATE: 4/15/22
PREPARED BY: [Signature]
CUSTOMER SIGNATURE: [Signature]
AMOUNT: \$ 5700.00
045
2305390348
#0000 04/15/2022 \$5,700.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29369-2676
3/22/22
3741
Pay to: [Signature]
Amount: \$ 208.00
FIRST PALMETTO BANK
#3741 03/30/2022 \$208.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29369-2676
3/28/22
3743
Pay to: [Signature]
Amount: \$ 250.00
FIRST PALMETTO BANK
#3743 04/04/2022 \$250.00

VICTORIA JOY STEVENS
4311 BRYANT ST.
LOUIS, SC 29369-2676
4/4/23
3781
Pay to: [Signature]
Amount: \$ 2,000.00
FIRST PALMETTO BANK
#3761 04/04/2022 \$2,000.00

1500
6000
2000
5700
28,750

Debit: 4/8/22 6000
3781 2000
Debit: 4/15/22 5700
28,750

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

060019198

April 08, 2022

REMITTER: VICTORIA J. STEVENS

**** Six Thousand and 00/100

\$6,000.00

CHARLIE ARD

MEMO:

060019198 253271916 56 5708656 009

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Louis SC 29569-2676

①

060019198

April 08, 2022

REMITTER: VICTORIA J. STEVENS

**** Six Thousand and 00/100****

\$ 6,000.00

CHARLIE ARD

MEMO:

⑆060019198⑆ ⑆253271916⑆ 56⑈5708656⑈ 009

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

①

City of Loris

South Carolina

Inspection Information

Permit #: 626

Permit Date: 02/22/2022

Inspection
Date: 05/19/2022

Permit Type:

Inspection
Type: Final InspectionRequested
By: Home owner

Contact Info:

Scheduled
Date: 05/19/2022Scheduled
Time: 00:00Completed
Date: 05/19/2022

Description: Need; 1. GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault breaker needed for all other outlets 4. No means of egress provided per R301.1 5. Need thermal expansion device on water heater 6. Need handrail on both sides of ramp.

Inspection
Status: Failed

Assigned To: Jimmy Prince

Time In: 00:00

Time Out: 00:00

Hours: 0.0

#4) inspection
disputed work

Notes

05/27/2022

INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER

05/08/2023

INSPECTION RESULTS PRINTED FOR PICK-UP PER REQUEST OF HOMEOWNER

Property Information

Parcel#: 17614030023

Victoria Joy Stevens

4311 Bryant St

Loris

Zoning: MULot: Block:

Victoria Joy Stevens

4311 Bryant St

Loris, SC 29569

Victoria Joy Stevens

(843) 516-1541

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MUSC Health
Medical University of South Carolina

**Department of Orthopaedics
& Physical Medicine**

96 Jonathan Lucas Street
CSB • Suite 708 • MSC 622
Charleston, SC 29425
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Administrative Office: 843-792-1792
Facsimile: 843-792-3674

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Lee R. Leddy, MD

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*Orthopaedic Research
& Clemson BioEngineering*
William R. Barfield, PhD
Martine LaBerge, PhD
Jessica E. Thaxton, PhD
Yongren Wu, PhD
Hai Yao, PhD

September 21, 2022

Patient: Victoria J Stevens
MRN: 000920112
Date of Birth: 4/7/1964
Location: MUSC Health West Orthopaedics

To Whom It May Concern:

Victoria J Stevens has been seen in our office, most recently on 8/17/22 for chronically infected left total knee arthroplasty with extensor mechanism disruption. Ms. Stevens has a long history of lower extremity dysfunction and multiple surgeries following a traumatic motor vehicle accident on 3/20/90. She has been non-ambulatory since July of 2018 and requires the use of a walker, sometimes a wheelchair for ambulation. Her bathroom in her home is not currently suitable for use with her walker. We find it reasonable for her to undergo renovation of her bathroom to meet standards to allow her to perform ADLs as needed. Please call with any questions or concerns.

Zeke Walton, MD

#) 5 numerous copies of orthopedic medical record

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

**Department of Orthopaedics
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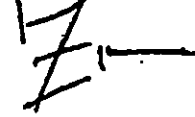
September 21, 2022

Patient: **Victoria J Stevens**
MRN: **000920112**
Date of Birth: **4/7/1964**
Location: **MUSC Health West Orthopaedics**

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Zeke Walton, MD



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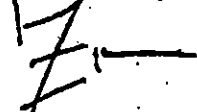
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Zeke Walton, MD



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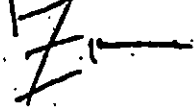
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Zeke Walton, MD



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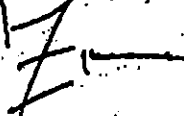
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Zeke Walton, MD



Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

6327.57 Total



AQUASHIELD PLUMBING, LLC

Help us better serve our community by recommending us to your friends and family!

Refer a friend

Invoice #279

For Services Rendered

Victoria Stevens

311 Bryant Street Loris, South Carolina 29569

(843) 516-1541

Issued

Jan 25, 2024

Due

Jan 25, 2024

Paid

Jan 25, 2024

Paid

Jan 25, 2024

Rate

Diagnosed frozen burst water pipe. Lines in shed not insulated. Recommend replacing. Shut water off at valve.

Remove and Replace water lines in shed. Insulate and secure all lines.

Install new stops for toilet and sink.

Remove and replace hose bib.

Redo waste piping for sink and add mechanical vent.

Remove and replace broken faucet. Supply faucet.

1 parts and labor included.

1 year worry free warranty.

Handwritten: #60 receipt repair work plumbing

Highly recommend insulating building properly to prevent future freezing of pipe and fixtures. Warranty to cover freezing of pipes due improper insulation.

QTY.

1

UNIT PRICE

\$1,368.50

TOTAL

\$1,368.

Jan 25, 2024

Rate

Added \$89 diagnostic fee.

% discount

QTY.

1

UNIT PRICE

\$0.00

TOTAL

\$0.

Subtotal

\$1,368.

3.0% Discount

- \$136.

Total

\$1,231.

Paid

- \$1,231.

Invoice balance

\$0.

Contact AquaShield Plumbing, LLC

Thank you for your business. Please contact us with any questions regarding this invoice.

P.O. Box 683, Aynor, SC 29511

(843) 591-2721 aquashieldplumbingllc@gmail.com

https://clienthub.getjobber.com/client_hubs/#20936ee-052...m_type=invoice_sent&utm_medium=sms&utm_source=twilio

26/01/24, 12:40 PM
Page 1 of 2

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

AquaShield Plumbing, LLC

P.O Box 683 | Aynor, SC 29511
(843) 591-2721 | aquashieldplumbingllc@gmail.com

RECIPIENT:

Victoria Stevens

4311 Bryant Street
Loris, South Carolina 29569

SERVICE ADDRESS:

4311 Bryant Street
Loris, South Carolina 29569

Invoice #279

Issued Jan 25, 2024

Due Jan 25, 2024

Paid Jan 25, 2024

Total \$1,231.65

Account Balance \$0.00

For Services Rendered

Product/Service	Description	Qty.	Unit Price	Total
Jan 25, 2024				
Flat Rate	Diagnosed frozen burst water pipe. Lines in shed not insulated. Recommend replacing. Shut water off at cutoff valve. Remove and Replace water lines in shed. Insulate and secure all lines. Add new stops for toilet and sink. Remove and replace hose bib. Redo waste piping for sink and add mechanical vent. Remove and replace broken faucet. Supply faucet. All parts and labor included. 1 year worry free warranty. Highly recommend insulating building properly to prevent future freezing of pipe and fixtures. Warranty does not cover freezing of pipes due improper insulation.	1	\$1,368.50	\$1,368.50
Flat Rate	Waived \$89 diagnostic fee. 10% discount	1	\$0.00	\$0.00

#62 2nd copy
receipt for insulated
pipes & repairs

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676



AquaShield Plumbing, LLC

P.O Box 683 | Aynor, SC 29511
(843) 591-2721 | aquashieldplumbingllc@gmail.com

Thank you for your business. Please contact us with any questions regarding this invoice.

Subtotal	\$1,368.50
Discount (10.0%)	- \$136.85
Total	\$1,231.65
Paid	- \$1,231.65
Invoice balance	\$0.00
Account balance	\$0.00

PAID

#7) paid receipt for \$6

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

Harolds Ac Repair Service And Installation

INVOICE

#110

DUE

Upon receipt

AMOUNT DUE

\$170.92

Victoria Stevens
4311 Bryant St
Loris, SC 29569

CONTACT US

1301 Cedar Branch rd
Loris, SC 29569

(843) 877-6184

✉ haroldsacrepairservice@gmail.com

INVOICE

Services

amount

\$85.00

Checked the system found that someone tied in a 10-2 wire into the disconnect box for the heat pump system. The disconnect box had over heated and burn the wire off. The 60 amp disconnect box was replace for the heat pump system and the 10-2 wire running to the shed was not install back into the disconnect box need to have a electrician run a new circuit for the shed.

Materials

amount

No Fuse Disconnect

\$85.92

No fuse disconnect

Subtotal

\$170.92

Total Tax

\$0.00

8% (8%)

\$0.00

Total

\$170.92

#8) Diagnostic fee for illegal wiring

Harolds Ac Repair Service And
Installation | M#115496

<http://www.haroldsacrepair.com>

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

Singleton Electric

2811 Allen Dew Rd Conway SC 29527

843-997-9655

SC State License

To whom it may concern:

On 9/12/23 I David Singleton Electrician, was calling in by home owner Mrs. Victoria Stevens at 4311 Bryant ST. Loris SC to check electrical wiring outside on the right side of her house. I found a burnt electrical disconnect box that was wired illegally against code, which caused an overload on the circuit that caught fire in the disconnect box and could have caused a severe fire damage to her home.

Sincerely,

David Singleton

Owner of Singleton Electric.

#9) Certified Electricians statement regarding
illegal wiring

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

Singleton Electric
2811 Allen Dew Conway SC .29527
843-997-9655

Invoice for Mrs. Victoria Stevens
Address 4311 Bryant Street Loris SC

Job description:

1. Hot check Electrical system for 220 power supply for building outside.
2. Change out breakers for more space in panel box for 220 60 amp breaker.
3. Dig ditch from the house to building outside in front yard area.
4. Run 60amp wire in conduit pipe to panel in building and wire it in.
5. Wire into disconnect box
6. Wire from disconnect box under house to panel box in conduit in storage room.
7. Wire into panel to 60 amp breaker.
8. Hot check power in building.

Materials and labor and trip charge: \$2750.00

Require: \$800.00 deposit.

Balance due completion of job ~~\$1900.00~~ 1,750.00

Paid 1,000.00

Balance — 1,750.00

#11) Certified electricians bill for

Correcting illegal wiring.

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676



AQUASHIELD PLUMBING, LLC

Help us better serve our community by recommending us to your friends and family!

Refer a friend

Invoice #279

For Services Rendered

Victoria Stevens

311 Bryant Street Loris, South Carolina 29569

(843) 516-1541

Issued

Jan 25, 2024

Due

Jan 25, 2024

Paid

Jan 25, 2024

Paid

Jan 25, 2024

Item Rate

Diagnosed frozen burst water pipe. Lines in shed not insulated. Recommend replacing. Shut water off at valve.

Move and Replace water lines in shed. Insulate and secure all lines.

Install new stops for toilet and sink.

Move and replace hose bib.

Do waste piping for sink and add mechanical vent.

Move and replace broken faucet. Supply faucet.

All parts and labor included.

1 year worry free warranty.

Highly recommend insulating building properly to prevent future freezing of pipe and fixtures. Warranty to cover freezing of pipes due improper insulation.

QTY.

1

UNIT PRICE

\$1,368.50

TOTAL

\$1,368.

Jan 25, 2024

Item Rate

Added \$89 diagnostic fee.

% discount

QTY.

1

UNIT PRICE

\$0.00

TOTAL

\$0.

Subtotal

\$1,368.

3.0% Discount

- \$136.

Total

\$1,231.

Amount due

- \$1,231.

\$0.

Invoice balance

Contact AquaShield Plumbing, LLC

Thank you for your business. Please contact us with any questions regarding this invoice.

P.O. Box 683, Aynor, SC 29511

(843) 591-2721 aquashieldplumbingllc@gmail.com

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26/01/24, 12:40 PM
Page 1 of 2

1/2) Copy of #6

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

AB MECHANICAL

"Serving All Of The Grand Strand"

Plumbing & Electric

P.O. Box 4123 • North Myrtle Beach, SC 29597

843-399-5505 • 808-307-9215

DATE OCT 15/23	☒ SERVICE ☐ INSTALL	☐ WILL CALL ☐ DELIVER	PHONE 843 516 1541
NAME Vic Stevens			MAKE _____
ADDRESS 4311 Bryant St			MODEL _____
Loris 29569 SC			SERIAL _____
ITEM TO BE SERVICED Hot water H.R.		NATURE OF SERVICE REQUEST Boiler Cld	
QUAN.	DESCRIPTION OF PARTS OR MATERIALS	AMOUNT	
	Expansion tank & fitting - 1/2" pipe		
	Electric cutoff & wire		
	move H.W.H. from under tunnel box		
	repair & replace with expansion tank		
	Part & Labor		750.00
LABOR PERFORMED		TOTAL MATERIALS	_____
move heater from under tunnel box / repair & replace		TAX	_____
		TOTAL LABOR	750.00
		TOTAL AMOUNT	750.00
DATE WANTED 10/15/23	DEPOSIT \$	RECEIVED BY [Signature]	
ESTIMATES ARE FOR LABOR ONLY, MATERIAL ADDITIONAL. WE WILL NOT BE RESPONSIBLE FOR LOSS OR DAMAGE CAUSED BY FIRE, THEFT, TESTING OR ANY OTHER CAUSES BEYOND OUR CONTROL			
AUTHORIZED BY:		CUSTOMER'S CLAIM CHECK	

TERMS - NET CASH
NO GOODS HELD OVER 30 DAYS

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

13) BM for
moving/heating
Hot water heater

A B Merlani
PO Box 4123 NMB SC
29597

Victor S Stevens
4311 Bryant St
Loris SC 29569
Phone 843 516 1541

14 Nov. 21.

Remove H w heater from building to
a inclusion outside. Build inclusion,
up pipe, remove,

Buildin' matters

411 - insulation, roofing hardware etc	367.00
E distance material Bag mix -	40.00
Plenum material tank, pipe, fitting	240.00
man.	50.00
materials -	697.00
labor	500.00
Permit fees	1197.00

Jul B in

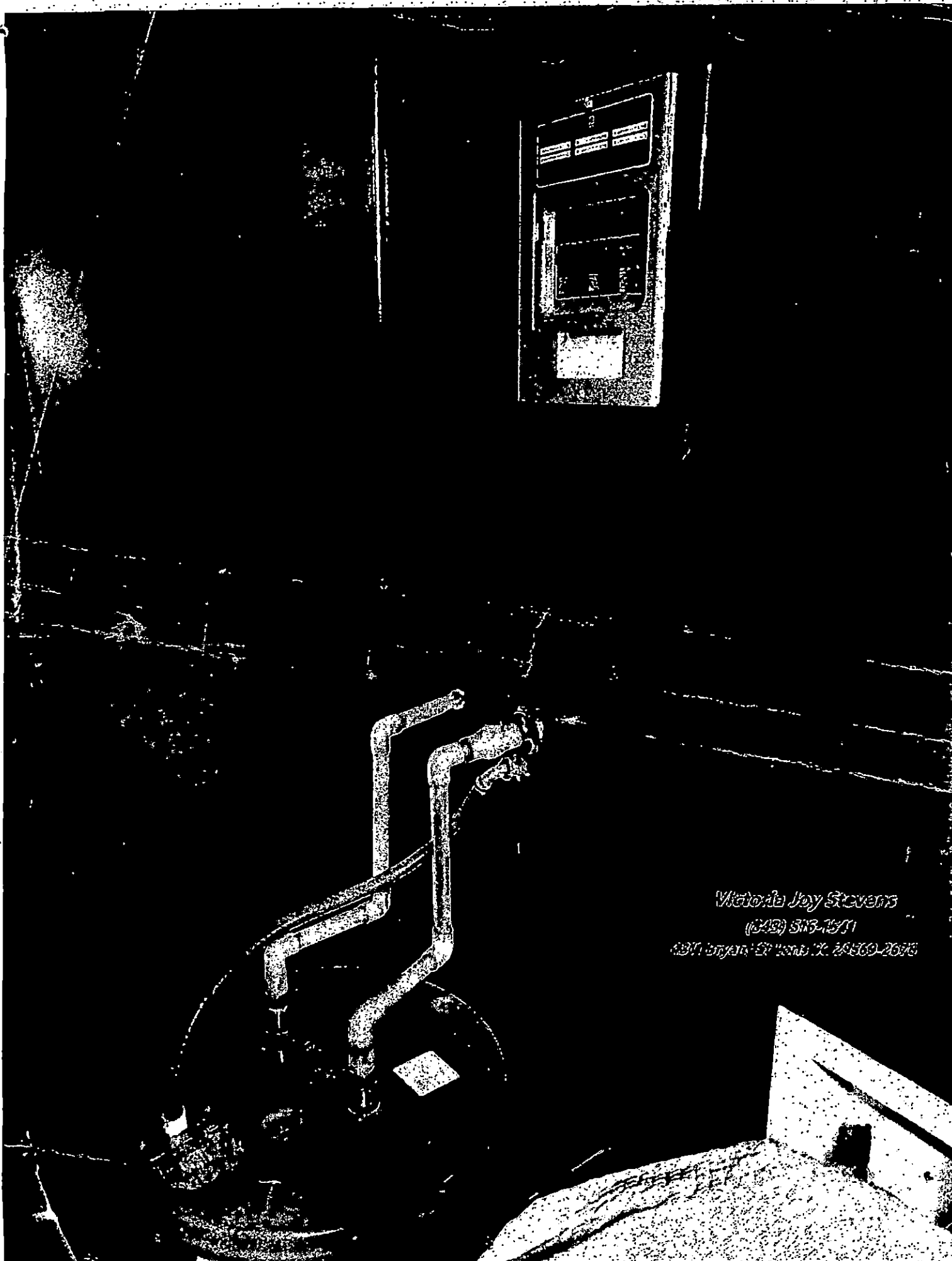
Current heater is in front
of small Bag inside

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

#14) Certified Master Plumber's Statement
For #13.



Victoria Joy Stevens
(648) 513-7571
1371 Bryan St. Suite 111 29569-2676

#1) Photo of water heater under breaker

chevrolet 1964 1965 1966
1967 1968 1969 1970
1971 1972 1973 1974 1975

- #1) Original Complaint ✓
- #2) Photo HWB ✓
- #3) Cost of printing court docs ✓
- #4) Copies of checks / statements ✓
- #5) City Inspection ✓
- #6) Statement Medical Need ✓
- #7) Receipts, notary papers ✓
- #8) AND Receipt #6
- #9) Diagnostic Fee for illegal wiring
- #10) Certified / Licensed Electrician statement for illegal wiring ✓
- #11) Bill for removing bath
- #12) Bill for fixing illegal wiring
- #13) Copy of 6
- #14) Bill for moving / housing HWB
- #15) Reasons for failed inspection
- #16) Notarization Defendant's Messages
- #17) Opposing Counsel Answers
- #18) Statement that saved my life
- #19) Statement Defendant Counsel did not know why I was injured
- #20) Counsel written violations of law 4th & 5th
- #21) Note to court where O. Counsel does not return calls
- #22) Statute Sexual harassment
- #23) IC Construction Compulsion of Labor
- #24) Keith's statement

Go A/c @ 4 @ Court House

2022 Feb 26 04:12

Victoria J. Brown

FILED
HORRY COUNTY
2025 FEB 18 A 9:36
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Get + #

Go file #

C clerk

A B McLaren
PO Box 4123 NMB SC.
29597

Victoria Stevens

4311 Bryant St

14 Nov. 24.

Loris SC 29569

Phone 843 516 1541

Remove H w heater from building to
a inclosure outside. Build inclosure,
up pipe, remove,

Builder's material

411 - insulation, roofing hardware etc	367.00
E lecture material Box unit -	40.00
Plenum material tank, pipe, fitting	240.00
man -	50.00
material -	697.00
labor	500.00
Permit fees	1197.00

Jul B in

Current heater is in front
of small Box inside

13

Victoria Joy Stevens

(843) 516-1541

4311 Bryant St Loris SC 29569-2676

REASONS FOR FAILED INSPECTION

1. GFCI breaker within 6' of sink and shower.

The National Electric Code requires Ground Fault Circuit Interrupters in wet areas, inclusive of bathrooms. Just about every region has some sort of requirement for ground-fault detection, and thousands of lives have been saved around the globe. The GFCI is designed to protect people from severe or fatal electric shocks but because a GFCI detects ground faults, it can also prevent some electrical fires and reduce the severity of other fires by interrupting the flow of electric current. The Defendants left GFCI breakers out when installing my bathroom. Mr. Charlie Ard, in fact, told this plaintiff my bath was ready to use.

After research this was learned: The NEC requires that all outlet receptacles in a bathroom be GFCI protected. Outlet circuit must be 20 amps: The outlets in a bathroom should be served by a 20-amp circuit, separate from the lighting circuit, to provide power items such as curling irons, razors, and hairdryers.

According to the National Electric Code (NEC), it requires a minimum of one GFCI-protected outlet per bathroom. The national recommendation is more than one, like two or three. You get to decide how many outlets you want to protect but have to have a minimum of one in your bathroom.

GFCIs are a type of circuit breaker used to shut off power when there is an imbalance between the incoming and outgoing current. The main purpose of GFCI outlets is to prevent the risk of electrical shock from happening. Barely noticeable in the bathroom, a GFCI outlet can prevent shocks and electrocution.

2. Protect NM at water Heater.

Runs of NM cable must be supported at least every 54 inches. They also must be secured within 12 inches of an electrical box that includes a cable clamp or within eight inches of a box or enclosure without a cable clamp.

Without conduit, wires can get damaged, which can lead to electrical fires and shocks. The insulation on unprotected wires can wear off over time, exposing live wires. Properly installed conduit makes inspection, maintenance, and repairs much easier.

3. ARCH fault breaker needed for all other outlets.

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

An arc fault breaker differs from a GFCI outlet or circuit breaker in that it detects slow electrical leaks. A slow leak typically occurs when wiring is compromised but not completely shorted. Some studies reveal that electrical wiring issues account for over 150 home fires across the United States *each day*. A slow leak typically occurs when wiring is compromised but not completely shorted. Slow, but still hazardous. An AFCI is a product that is designed to detect a wide range of arcing electrical faults to help reduce the electrical system from being an ignition source of a fire. Conventional overcurrent protective devices do not detect low level hazardous arcing currents that have the potential to initiate electrical fires.

4.No means of egress provided per R301.1

5.Need thermal expansion device on water heater. This work done by Andy Bisognia, invoice available.

6.Need handrails on both sides of ramp.

7. There is also the fact the defendants wired, illegally and against code, tying a 10-2 wire into the disconnect box for the heat pump. This caused a circuit overload, which caught the disconnect on fire. This could have caused severe fire damage to my home. It blew the shed in front wiring, and a new circuit needed be run to that shed. The disconnect box/fuse needed to be replaced.

I will file suit if these defects are not repaired,

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

16
STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff,

vs.,

Charles Ard and Wilbur Causey,

Defendant.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

DEFENDANTS' ANSWER

16
FILE NO.: 2022-CP-26-04125

The Defendants, Charles Ard and Wilbur Causey, by and through Their undersigned attorney, hereby makes Answer as follows:

FOR A FIRST DEFENSE
(General Denial)

1. Each and every allegation of the Plaintiff's Complaint not hereinafter admitted, qualified or explained is denied and strict proof demanded thereof.

FOR A SECOND DEFENSE
(Failure to State a Claim)

2. The Complaint fails to state facts sufficient to constitute a claim for relief and therefore, should be dismissed pursuant to Rule 12(b)(6), FRCP.

FOR A THIRD DEFENSE
(Failure to Mitigate Damages)

3. Plaintiff has a legal obligation to mitigate damages claimed, which are denied, and to the extent she failed to do so, her claims are barred, in whole or in part.

FOR A FOURTH DEFENSE
(Good Faith)

4. Defendants acted in good faith and in a reasonable manner and are therefore not liable for any of the injuries or harm alleged in the Complaint.

Conway City
Horry

FOR A FIFTH DEFENSE
(Reservation)

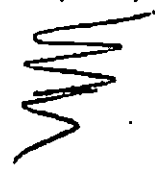
5. Defendants reserve the right to assert, and do not waive, any additional or further defenses as may be revealed by information acquired during discovery or otherwise.

WHEREFORE, having fully responded to the Plaintiff's complaint, the Defendants pray that such Complaint be dismissed with prejudice, and that the relief sought by the Plaintiff be denied, that judgement be rendered in favor of the Defendants, that Plaintiff be assessed with all costs of this action, Defendants be awarded any fees and that Defendants have such and further relief as this Court may deem just and proper.

RIVERTOWN LAW

s/L. Bradley Smith
L. Bradley Smith, Esquire
SC Bar #73192
Attorney for Defendant, Charles Ard
Attorney for Defendant, Wilbur Causey
908 Fourth Avenue
Conway, South Carolina 29526
Phone: (843) 488-5600

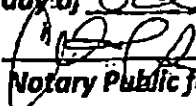
August 11, 2022



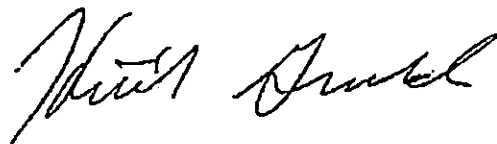
REMAINING PORTION LEFT INTENTIONALLY BLANK

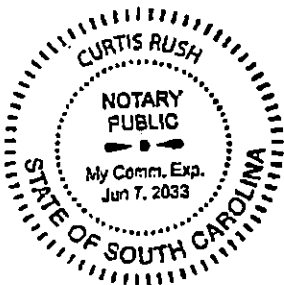
I, Keith Gerald, took Victoria Stevens to a deposition at Rivertown Law in Conway, SC. This deposition was relative to construction, and ADA accommodations and safety. I went in and told them I had brought Victoria Stevens. I asked where their wheelchair ramp was. The lady informed me that she didn't know Victor was in a wheelchair and they didn't have a ramp.

20

SWORN to before me this 16
day of Dec, 2024.

Notary Public for South Carolina

Keith Gerald 10-16-2024





Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

TRANSCRIPTS OF CHARLIE ARD'S MESSAGES

22/5/22 Victoria, call me and quit acting stupid. This is Charlie, okay. I want to fix your stuff where it'll pass inspection. Then I'll be through with you, okay...

14/5/22 Victoria, don't call me threatening me. If you do I will have your tail locked up.

12/5/22 Victoria, if you want all steps and all that shit hung up in this building, I'm going to need a thousand dollars, up front! If you don't want it just tell me and I won't fuck with you no more girl

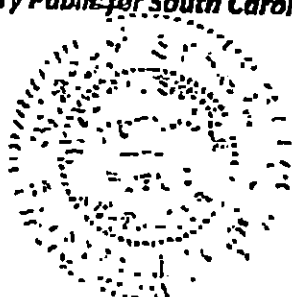
11/5/22 Victoria, I apologize, I'm just tired, and uh... I'll see you in the morning about 8 o'clock, okay baby. I still love you girl, this is Charlie, you know that.

4/5/22 Victoria, this is Charlie. If you think I charge you too much I want you to let me know 'cause I am tired of hearing this shit. Okay? If I charge you too much don't fuck with me, no more!

Victoria Joy Stevens

FILED
HORRY COUNTY
2022 SEP - 1 P 2:00
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

SWORN to before me this 31st
day of August, 2022
[Signature]
Notary Public for South Carolina



15

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

times that he did not charge too much. He and Mr. Causey's presence, at my residence grew shorter, some days not at all. I Inquired as to why, and he stated other work.

I paid promptly, and fully when asked. I met my responsibility in our verbal contract. I asked Mr. Ad, a week before he told me if I did not give him a thousand dollars up front that, he would not be back and I could kiss his a#@; would this cost me anymore? He said no. I hired he and Mr. Causey due to my disability and a replaced hip, I could hardly get into my present bathroom. He agreed to complete this job. I paid him all he asked for. While his work was, although not timely, good, or so I thought, his professionalism was totally absent.

I ask him to have this work completed. I am disabled, I cannot presently ambulate, and thus using a walker within my present bath is necessity. My walls and molding bear marks from this, and it is very dangerous. This is on the inspector's report, "1. Need 1 GFCI breaker within 6' of sink and shower 2. Protect NM at water heater 3. ARCH fault beaker needed for all other outlets 4. No means of egress provided per R301.1 5. Need thermal expansion device needed on water heater 6, Need handrails on both sides of ramp." I ask that he correct these violations of code. I cannot use this bath for fear of electrocution. Also, and this is atrocious for any contractor; cigarette butts, bent nails, and refuse were left all over my driveway, and around the bath addition, I cleaned this up, although painful and extremely difficult. There is also the fact that when he installed the doors, bedroom door and bath door, I only received one key. Between his antagonism, sexual innuendos, and vulgar heated messages, I ask for funds to change these doorknobs as he, his work, his verbiage, and his response to my concerns, let me know my safety, well-being, and peace of mind are not his concerns. When he worked on the Shed in my front yard, I only received one key to that door, so I ask that be covered, too.

Mr. Ard has told me having a license, or not, had no bearing on his ability to work. Therefore copies of this letter and all checks, receipts, and the inspector's report are going to L.L.R. accompanied by a complaint form. Due to the monies I have spent, the hardship this has presented me, Mr. Ard's repeated vulgarities and refusal to speak to me, telling me his attorney says I have no case; I plan on seeking compensation in court as well. Mr. Wilbur Causey has, at no time, acted as Mr. Ard has, but he was present during much of this; and was party to what occurred.

FILED
Horry County
2022 SEP -1 P 2:00
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

17

My name is Randy Lucas. I reside in Loris, S.C. I can be contacted at 843-473-2767. I have been close friends with Victoria Stevens since right after meeting my wife, Carla. They have been friends from their pre-teen years. Victoria had a Graceland shed she bought turned into a bathroom, and due to her knowledge of my years in construction asked me to come over and look at it. She told me the contractors had told me her bathroom was ready to use, but she had not seen passed inspection for their work. I came right over to her house. With my years of experience I knew an addition, with plumbing and electricity should have legally been inspected. I was curious as to why anyone in Construction would commit such an error.

Upon arrival at Victoria's house to look at this new exterior bathroom first thing I noticed was there was no egress,, that the porch was totally enclosed with an enclosed ramp to the door to her bedroom. There was no way for her to exit the structure if needed. As I entered I saw that there were no Ground Fault Circuit Interrupters (GFCI) in the bathroom, anywhere. There are breakers that are designed to shut the power off in less than a second; these are a needed electrical safety device which save lives by reducing death or the risk of serious harm from an ongoing electric shock. I started to see why inspection had been a detail these contractors avoided. Then I saw that the receptacles and light switches were too close to the water sources; this is another cause for my alarm, risk of electrocution is prominent with this oversight. Then I really became angry. The water heater did not have an expansion valve to keep it from exploding. With her shower and washer with 11 feet of each other this was yet another disastrous mistake. I angrily told Victoria do not use this bath or washer/dryer as there were several serious mistakes that could cost her life, or bad injury. As we went back through her house I noticed there were no steps or exit, and no way for her to exit. Victoria' got in a bad wreck in 1990. We thought we had lost her. She has recovered so much. She was in a coma over a year! My wife and I said many a prayer; far too many for her to die from substandard, careless, shoddy contracting. I base my report off over 30 years in construction, both electrical and plumbing. I am retired and disabled currently. I do not hold a Contractor's license.

Randy Lucas 10/16/2023

17



SWORN to before me this 16th
day of OCTOBER, 2023.
Allen M. Haines
Notary Public for South Carolina

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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), SCRCPP; ☐ Rule 41(a), SCRCPP (Vol. Nonsuit); ☐ Rule 43(k), SCRCPP (Settled);
☐ Other
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j), SCRCPP; ☐ 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:

THE CASE APPEARED ON THE FEBRUARY 18, 2025, JURY TRIAL ROSTER, THE CASE WAS CONTINUED AND WILL BE PLACED ON THE NEXT UNPUBLISHED AVAILABLE ROSTER.

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 02/20/2025 .

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al
Case Number: 2022CP2604125
Type: Order/Electronic Form 4

15th Circuit Resident Judge

s/ B. Alex Hyman

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 02-20-2025 04:52:28 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 02-20-2025 04:51:01 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order/Electronic Form 4 - Case Continued

Filed by or on behalf of: B. Alex Hyman

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2025 Feb 20 4:52 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff,

vs.

Charlie Ard and Wilbur Causey,

Defendants.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

**DEFENDANTS' MOTION FOR
CONTINUANCE**

FILE NO.: 2022-CP-26-04125

Comes now the Defendants, by counsel, and moves the Court to continue the trial set herein, and on support thereof alleges and says:

1. That the above-captioned matter is number 11 on the Jury trial roster for Monday, April 14, 2025, to Friday, April 18, 2025;
2. Attorney for the Defendants L. Bradley Smith, was already scheduled for a two-day trial in the Family Court of the Fifteenth Judicial Circuit for the same time period as the Jury Trial Roster; and
3. Attorney, L. Bradley Smith, is requesting that the trial for the matter referenced above to be heard no sooner than Thursday, April 17, 2025, so he may attend the two-day trial in the Family Court of the Fifteenth Judicial Circuit.

WHEREFORE, the Defendants' attorney moves this Court for an Order Continuing this case to allow him to attend the two-day trial in the Family Court of the Fifteenth Judicial Circuit.

RIVERTOWN LAW

s/L. Bradley Smith

L. Bradley Smith, Esquire
SC Bar #73192

Attorney for Defendant, Charlie Ard
Attorney for Defendant, Wilbur Causey
908 Fourth Avenue
Conway, South Carolina 29526
(843) 488-5600

March 13, 2025

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 06-04-2025 10:20:11 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 06-04-2025 10:19:48 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption:

Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted:

Trial Brief

Filed by or on behalf of:

Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2025 Jun 04 10:32 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

COUNTY OF HORRY)

FIFTEENTH JUDICIAL CIRCUIT

Victoria Joy Stevens,)

Plaintiff,)

AFFIDAVIT OF MAILING

vs.)

Charles Ard and Wilbur Causey,)

Defendants.)

Docket No.: 2022-CP-26-04125

Personally appeared Ann Roschy, an employee of Rivertown Law and attorney L. Bradley Smith, attorney for the Defendants, who states she served the Plaintiff, Victoria Joy Stevens, with the Defendants' Pre-Trial Brif by:

☒ EMAIL ONLY to: joyphul@sccoast.net

☐ Certified mail

☐ restricted delivery

☐ return receipt requested

in the United States Mail, with proper postage attached and receipt attached (if applicable), on June 4, 2025 addressed as follows:

Victoria Joy Stevens

Email address: joyphul@sccoast.net



Affiant

Sworn to before me this
4th day of June 2025.

Melissa Hersey
Notary Public of South Carolina

Printed Name: Melissa Hersey

My Commission expires: 03/28/2029

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 06-04-2025 11:27:23 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Affidavit/Affidavit of

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2025 Jun 04 11:30 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 06-04-2025 11:27:35 AM.



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al

Case Number: 2022CP2604125

Type: Order/Electronic Form 4

So Ordered

Patrick C. Fant, III

Electronically signed on 2025-04-22 13:59:38 page 3 of 3

ELECTRONICALLY FILED - 2025 Apr 22 2:21 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ELECTRONICALLY FILED - 2025 Apr 22 2:21 PM - Horry - COMMON PLEAS - CASE#2022CP2604125

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 03-13-2025 11:03:45 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 03-13-2025 11:01:55 AM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Motion/Continuance
Proposed Order/Continuance

Filed by or on behalf of: Lawrence Bradley Smith

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2025 Mar 14 8:36 AM - HORRY - COMMON PLEAS - CASE#2022CP2604125

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Victoria Joy Stevens,

Plaintiff,

vs.

Charlie Ard and Wilbur Causey,

Defendants.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

ORDER OF CONTINUANCE

FILE NO.: 2022-CP-26-04125

This Order of Continuance comes before the Court at the request of the attorney for the Defendant, Charlie Ard and Defendant Wilbur Causey. A Jury Trial Roster is currently scheduled for the week of Monday, April 14, 2025, to Friday, April 18, 2025.

The Defendants are requesting a continuance due to the fact that the Defendants' attorney, L. Bradley Smith, was previously scheduled for a two-day trial in Family Court of the Fifteenth Judicial Circuit at the same time of the Jury Trial Roster. The Defendants' attorney requested the trial to be heard no sooner than Thursday, April 17, 2025.

IT IS THEREFOR ORDERED, ADJUDGED AND DECREED that this action shall be continued;

AND IT IS SO ORDERED THIS _____ DAY OF MARCH 2025.

Honorable Judge of the Court of Common Pleas
Fifteenth Judicial Circuit
Conway, South Carolina



Horry Common Pleas

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant, et al
Case Number: 2022CP2604125
Type: Order/Continuance

15th Circuit Resident Judge

s/ B. Alex Hyman

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 03-17-2025 04:18:21 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 03-17-2025 04:18:12 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Order/Continuance Order/Continuance

Filed by or on behalf of: B. Alex Hyman

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2025 Mar 17 4:18 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

NOTICE OF CASE SCHEDULING

March 11, 2025



**Case 2022CP2604125 - Victoria Joy Stevens VS Charlie Ard ,
defendant, et al has been added to the following Court Roster:**

**Roster ID: 259 - CP JURY TRIALS (4/14/2025-4/18/2025) Honorable
Patrick Fant 3B**

This case has been assigned as priority 11 of 33 cases scheduled for the court period of
4/14/2025 through 4/18/2025

ALL REQUEST FOR CONTINUANCES/SCHEDULING MUST BE FILED WITH THE
HORRY COUNTY CLERK OF COURT NO LATER THAN MONDAY, APRIL 7, 2024 AT
NOON. IF YOUR CASE IS SETTLED, FILE A STIPULATION OF DISMISSAL WITH
THE COURT.

The Jury Trial Roster starting Monday, April 14, 2025 with the Honorable Patrick Fant is
now available on the sccourts.org website. The roster meeting will start at 9:30 am in
courtroom 3B. The jurors will report at 10:00 am in the jury pool room on the first floor.
Please contact Sheila Harrelson, Common Pleas Jury Trial Coordinator 843-915-5075 or via
email harrelsh@horrycountysc.gov with any questions or please email with any settlements
that relate to this docket.

Mail Notice To:

Victoria Joy Stevens
4311 Bryant St

Loris, SC 29569

Court Info:

Common Pleas
1301 2Nd Avenue
P O Box 677
Conway, SC 29528-9528

If you have any questions regarding the scheduling of this case, please contact the courts at:

(843)915-5080

Respectfully,

7489 0090 0027 6661 2368 84

Renee N. Elvis
Clerk of Court

Certificate of Electronic Notification

Recipients

Lawrence Smith - Notification transmitted on 03-24-2025 03:39:50 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP2604125

Official File Stamp: 03-24-2025 03:39:37 PM

Court: CIRCUIT COURT

Common Pleas

Horry

Case Caption: Victoria Joy Stevens VS Charlie Ard , defendant,
et al

Document(s) Submitted: Notice/Notice of Hearing Notice/Notice of Hearing

Filed by or on behalf of: Sheila Harrelson

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Lawrence Bradley Smith for Charlie Ard et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Victoria Joy Stevens for Victoria Joy Stevens

Victoria Joy Stevens for Victoria Joy Stevens

ELECTRONICALLY FILED - 2025 Mar 24 3:40 PM - HORRY - COMMON PLEAS - CASE#2022CP2604125

Opposing Counsel has threatened litigation to recover losses
of Defendant's Laughlin, but not at all Army coming from a
licensed attorney, as in defense 5 "Defendants Answers"

40-11-370 (c) SCC02

An entity which does not have a valid license may
not bring an action @ law or in equity to enforce
the provisions of a contract

20 22 CP26 4125

To go 2/6

RENEE M. ELVIS
CLERK OF COURT
HOBBS COUNTY, SO

2025 MAR 27 P 12:25

FILED
HOBBS COUNTY

Victoria Joy Stevens
(843) 516-1541
4311 Bryant St Loris SC 29569-2676

2022 CP26 4125

2-17-25

Jo whom this may concern,
due to COVID-19 and being the care
taker of my mother who was suffering
compulsive heart failure. Terry Howell,
Keith Howell and Heather Howell moved
out of my home in April 2020. After Terry
moved into Victoria Stewart shed.

Cynthia Howell

Sworn to before me this 17th day of
February, 2025.

Melinda A. Davis
Notary Public

My Commission Expires:
March 18, 2032

FILED
Horry County

2025 MAR 27 P 12:27

RENEE N. ELVIS
CLERK OF COURT
Horry County, SC

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP2604125

Victoria Joy Stevens
PLAINTIFF(S)

Charlie Ard 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:

The case appeared on the jury trial roster on April 14, 2025. However, it was not heard due to an order of continuance filed March 17, 2025, stating that it could not start before Thursday, April 17, 2025. The case was continued because Friday, April 18, 2025 was a holiday.

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 04/22/2025 .

Victoria Joy Stevens for Victoria Joy Stevens
Victoria Joy Stevens for Victoria Joy Stevens

NAMES OF TRADITIONAL FILERS SERVED BY MAIL