

106104

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Oct 06 2025

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals
RECEIVED

Milton G. Kimpson, Circuit Court Judge

OCT 07 2025

Appellate Case No. 2025-000397

SC Court of Appeals

Professional Financial Services Respondent,

v.

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

RESPONDENT'S MOTION TO
DISMISS APPEAL

John S. Kay
Hutchens Law Firm LLP
240 Stoneridge Drive, Suite 400
Columbia, S.C. 29210
Phone: (803) 726-2700
john.kay@hutchenslawfirm.com
Attorney for Respondent

Brittney L. Greene aka Brittney L. Golson
7628 Stone Street
Columbia, S.C. 29209
greene.brittney@yahoo.com

Tremaine Golson aka Tremaine D. Golson
7628 Stone Street
Columbia, S.C. 29209
greene.brittney@yahoo.com

On August 18, 2025, the Appellants filed their Amended Record on Appeal. In response, on August 22, 2025, Respondent filed a motion to dismiss the appeal on the grounds that Appellants' amended record on appeal failed to comply with the order issued by the Court on August 6, 2025. Subsequently, the Court issued an Order on September 11, 2025, which denied Respondent's motion to dismiss, but required the Appellants to File and serve a second amended record on appeal within ten days of the order to prevent dismissal of the appeal. The Order further provided details as to what the record on appeal should include and noted the relevant rules from the South Carolina Appellate Court Rules, including Rule 210, SCACR. On September 22, 2025, Appellants filed their second amended record on appeal. The Respondent filed a second Motion to Dismiss on September 24, 2025, as the Record on Appeal failed to comply with the Court's Order and the relevant rules of appellate procedure. On October 2, 2025, the Appellants filed a third Amended Record on Appeal, without leave of Court.

Appellants' third Amended Record on Appeal is untimely filed and fails to comply with the applicable rules. Rule 210(c) provides that the Record on Appeal should include all matter designated to be included by any party under Rule 2009 and shall comply with the requirements of Rule 267. A review of the Appellant's third Amended Record on Appeal reveals that it fails to comply with these requirements. The Court's Order granted the Appellants ten days from the date of the order (September 11, 2025) to file a corrected Record on Appeal. The granted time frame has passed. Additionally, in this third amended record, the Appellants failed to attach the proper Exhibits to the Respondent's Reply to Motion to Compel Arbitration and Stay; the appellants also failed to attach the proper Exhibit to the Respondent's Motion for Summary Judgment. The Appellants added page numbers to the pleadings within the Record but did not appropriately number the pages of any of the exhibits. The Appellants insist that these errors are

clerical and technical in nature, but it is precisely these errors which prevent the Respondent from being able to properly and accurately reference the Record in its final brief. Lastly, the pleadings listed in the Record are still misprinted and contain errors that are not in the original pleadings (See pages 30-34 of the latest Record on Appeal). This error has been repeated consistently throughout the Records on Appeal filed by the Appellants. Respondent should not have to keep pointing out errors in the Record, so that the Appellant can then go back and try again.

This is the fourth time the Respondent has had to file a pleading in this appeal because the Appellants have failed to follow the rules of this Court. The pleadings received from the Appellant are coming from an individual named Isiah Smith whose email address is sisiah28@gmail.com. Respondent has no idea who this individual is, but the Respondent suspects that this individual is preparing pleadings for the Appellants and does not possess a license to practice law in the state of South Carolina. The pleadings being submitted to the Court by Isiah Smith do not contain the signatures of the actual Appellants. As a result, the Respondent has had to incur significant time delay and additional attorney fees and costs on this case which

is a simple automobile repossession. For these reasons, the Respondent again requests that the Appellants' appeal be dismissed.

Respectfully submitted,


/s/ John S. Kay

John S. Kay, S.C. Bar #7914

HUTCHENS LAW FIRM

P.O. Box 8237 (29202)

240 Stoneridge Dr., Suite 400

Columbia, SC 29210

P.O. Box 8237

Columbia, S.C. 29202

803-726-2700 (ext. 2705)

Email: John.kay@hutchenslawfirm.com

*Attorney for Respondent Professional Financial
Services*

October 6, 2025

RECEIVED

Oct 06 2025

**SC Court of Appeals
RECEIVED**

OCT 07 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY
The Hon. Milton G. Kimpson, Circuit Court Judge

Appellate Case No. 2025-000397
Trial Court Case No. 2024-CP-40-03931

Professional Financial ServicesRespondent,

v.

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

PROOF OF SERVICE

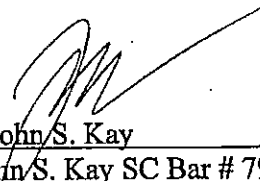
I certify that I have served Respondent's Motion to Dismiss Appeal on the Appellants listed below on October 6, 2025, by depositing the same in the United States Mail, postage prepaid and addressed as follows

Tremaine Golson
7628 Stone Street
Columbia, S.C. 29209

Brittney L. Golson
7628 Stone Street
Columbia, S.C. 29209

October 6, 2025

Columbia, SC



s/John S. Kay
John S. Kay SC Bar # 7914
Hutchens Law Firm LLP
Post Office Box 8237
Columbia, S.C. 29202
P: 803-726-2700
john.kay@hutchenslawfirm.com
Attorneys for Respondent
Professional Financial Services