

# EXHIBIT A

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON  
DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT  
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER  
ON PARTITION HEARING

RECEIVED

OCT 06 2025

SC Court of Appeals

This matter came before the Court on August 25, 2025, at 2:00 P.M., for a hearing on Plaintiff's action for partition by sale of real property located at 8297 Delhi Road, North Charleston, SC 29406. Present at the hearing were Plaintiff Danielle C. Brown ("Plaintiff") and her counsel, Logan S. Davis, Esq. and S. Tyler Graves, Esq. of Graves & Davis, LLC. Defendant Crystal Brown Nwaneri ("Defendant") was not present at the hearing.

#### PROCEDURAL HISTORY AND SERVICE

The Court finds that appropriate notice was provided to Defendant to appear at the hearing. The record reflects that Plaintiff's counsel filed extensive exhibits along with its Amended Memorandum in Support of Partition by Sale to establish appropriate notice, including:

1. Service by publication in *The Post and Courier* newspaper on May 22, May 29, and June 5, 2024;
2. Multiple attempts at notice to Defendant's last known address at 17293 Oakwood Lodge Lane, Piney Point, MD 20674;

3. For the January 29, 2025 hearing: successful delivery on January 21, 2025 (FedEx tracking #771449779691) and attempted delivery requiring signature (FedEx tracking #771449731962);
4. For the August 25, 2025 hearing: successful delivery on August 15, 2025 (FedEx tracking #883502622602) and successful signed delivery on August 15, 2025 (FedEx tracking #883502697920);
5. Email notice to Defendant at the email address previously used for communications in this matter.

The Court confirmed that Defendant is in default pursuant to Rule 55(a), SCRPC, having been entered on September 17, 2024, and has failed to make an appearance in this case.

#### **FINDINGS OF FACT**

Based on the testimony and evidence presented at the hearing, the Court makes the following findings of fact:

1. Plaintiff and Defendant each own a fifty percent (50%) undivided interest, as tenants-in-common, in the subject property located at 8297 Delhi Road, North Charleston, SC 29406, TMS No.: 485-06-00-026 (the "Property");
2. The Property is not encumbered by any mortgage.
3. The subject Property is the Plaintiff and Defendant's childhood home;
4. Plaintiff made attempts to discuss the disposition of the subject Property with Defendant, but has never received a clear answer regarding Defendant's intentions;
5. Plaintiff is agreeable to selling her interest to Defendant at fair market value;
6. Plaintiff wishes the Property to be sold in the event Defendant does not wish to purchase Plaintiff's interest;

7. Plaintiff has incurred costs and expenses related to the ownership of the Property, including landscaping expenses totaling \$6,300.00 from 2019 to present;
8. Plaintiff has incurred attorney's fees and costs related to this partition action;
9. Plaintiff will obtain an appraisal to determine fair market value of the Property.

#### **CONCLUSIONS OF LAW**

1. This Court has jurisdiction over the subject matter and the parties to this action;
2. Partition is available as a matter of right to any co-tenant under S.C. Code Ann. § 15-61-10;
3. The Property is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act;
4. Defendant has been provided appropriate notice as required for the Court to proceed with ordering partition proceedings;
5. Defendant is in default pursuant to Rule 55(a), SCRPC, having been entered on September 17, 2024, and has failed to make an appearance in this case.
6. Due process requires that Defendant be afforded an opportunity to purchase Plaintiff's interest before the Property is sold to third parties.

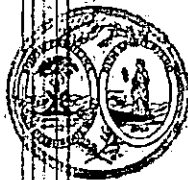
#### **ORDER**

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. Standing Order Application: The Standing Order in All Partition Actions dated December 20, 2007, is applicable to this case in order to protect the due process rights of Defendant regardless of her default status. A copy of the Court's Standing Order is incorporated herein as Exhibit A and made a part of this Order.

2. **Election to Purchase:** Defendant shall be granted an opportunity to elect to purchase Plaintiff's fifty percent (50%) interest in the Property, pursuant to the December 20, 2007 Standing Order.
3. **Deadline for Election:** Defendant shall have until September 26, 2025, to notify the Court and Plaintiff's counsel in writing of Defendant's decision to purchase Plaintiff's interest and the proposed terms of such purchase, if Defendant decides to do so.
4. **Method of Notice:** Any notice from Defendant shall be filed with the Court and served upon Plaintiff's counsel at the address of 1730 Central Park Road, Charleston, SC 29412.
5. **Hearing on Election:** A hearing is scheduled for October 6, 2025, at 1:00 P.M., at which time the Court will determine whether Defendant has elected to purchase the Property and, if so, will address the terms of such purchase.
6. **Notice of Hearing:** Plaintiff's counsel shall provide notice of the October 6, 2025 hearing to Defendant using the same methods of service as were used for the August 25, 2025 hearing.
7. **Determination of Value:** Plaintiff will obtain an appraisal to determine fair market value of the Property.
8. **Preservation of Rights:** This Order preserves Plaintiff's rights to seek partition by sale, reimbursement for expenses, and attorney's fees and costs.

**[MASTER-IN-EQUITY'S SIGNATURE PAGE TO FOLLOW]**



**Charleston Common Pleas**

**Case Caption:** Danielle C Brown VS Crystal Brown Nwaneri

**Case Number:** 2023CP1006212

**Type:** Master/Order/Other

**So Ordered**

**s/Mikell R. Scarborough 3062**

Electronically signed on 2025-09-03 15:33:50 page 5 of 5

EXHIBIT A  
Standing Order In All  
Partition Actions

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )

IN THE MASTER IN EQUITY COURT  
FOR CHARLESTON COUNTY

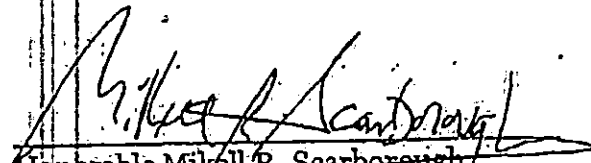
STANDING ORDER IN ALL PARTITION ACTIONS

This court is now regularly seeing partition actions in which the purpose of the action is the contemplated sale of the real estate contained therein. Therefore, pursuant to Section 15-61-25, 1976 SC Code of Laws, as Amended, (2007 Supp.), this court shall require Notice of the requirements of this statute to be served upon all parties in the action and upon all joint tenants or tenants in common. This statute states:

"The Court shall provide for the non-petitioning joint tenants or tenants in common who are interested in purchasing the property to notify the Court of that interest no later than ten (10) days prior to the date set for the trial of the case. The non-petitioning joint tenants or tenants in common shall be allowed to purchase the interests in the property as provided in this section whether default has been entered against them or not." 1976 SC Code of Laws, Section 15-61-25 (A).

This notice shall be served upon all parties and the required tenants in common at the time the Notice of Hearing is served herein. Proof of service of the Notice of Hearing and this Order providing Notice to the tenants of their rights in the property shall be required at the time of the hearing.

IT IS SO ORDERED!

  
Honorable Mikell R. Scarborough  
Master in Equity for Charleston County

December 20, 2007  
Charleston, South Carolina

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SC Court of Appeals

**EXHIBIT B**

**STATE OF SOUTH CAROLINA  
IN THE COURT OF COMMON PLEAS  
CHARLESTON COUNTY**

Case No.: 2023-CP-6212.

**Danielle Brown,**

Plaintiff;

v.

**Crystal Brown Nwaneri,**

Defendant.

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OCT 06 2025

SC Court of Appeals

**NOTICE OF APPEAL**

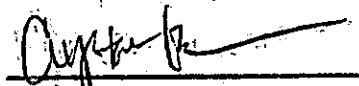
NOTICE IS HEREBY GIVEN that the Defendant, appearing *pro se*, hereby appeals to the South Carolina Court of Appeals from the orders entered in this matter by the Honorable Jennifer B. McCoy, Charleston County Clerk of Court Julie J. Armstrong, and Master-in-Equity Mikell R. Scarborough, including the September 3, 2025 order and all related orders dated April 18, 2024, September 17, 2024, September 19, 2024, and August 25, 2025.

This appeal is taken pursuant to Rule 203 of the South Carolina Appellate Court Rules.

The Plaintiff first sent written notice of the September 3, 2025 order on September 17, 2025, which was delivered on September 22, 2025 via FedEx Saver (Federal Express tracking number 884446967013).

True and correct copies of the orders being appealed are attached hereto collectively as Exhibits A, B, C, D, and E.

Respectfully submitted,



**Crystal Brown Nwaneri, *pro se* Defendant**  
17293 Oakwood Lodge Lane  
Piney Point, MD 20674  
Phone: (917) 651-8546


Date: September 27, 2025

## CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Notice of Appeal on counsel for the Plaintiff by U.S. Mail, with delivery confirmation, addressed as follows:

**Logan S. Davis, Esq.**  
Graves & Davis, LLC  
1730 Central Park Road  
Charleston, SC 29412  
Phone: (843) 805-4649

This the 27<sup>th</sup> day of September, 2025.

  
Crystal Brown Nwaneri, *pro se* Defendant  
17293 Oakwood Lodge Lane  
Piney Point, MD 20674  
Phone: (917) 651-8546

# EXHIBIT B



**Charleston Common Pleas**

**Case Caption:** Danielle C. Brown VS Crystal Brown-Nwaneri  
**Case Number:** 2023CP1006212  
**Type:** Order/Publication

So Ordered

/Julie J. Armstrong, Charleston County Clerk of Court, by BLC

Electronically signed on 2024-04-18 12:46:55 page 7 of 4

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION AND ORDER FOR  
SERVICE BY PUBLICATION**

**RECEIVED**

OCT 06 2025

SC Court of Appeals

**YOU WILL PLEASE TAKE NOTICE** that Plaintiff, Danielle C. Brown (hereinafter referred to as the "Plaintiff"), by and through her undersigned counsel for purpose effectuating service upon the above-captioned Defendant (hereinafter referred to as "Defendant") move before this Honorable Court, for an Order authorizing service by publication of the above referenced matter, on the basis that the Defendant still has not been personally served. The Plaintiff has not been able to effectuate service pursuant to ordinary means: personal service or substituted service, and upon information and belief, the Defendant is aware of this matter, has made no attempt to provide her whereabouts to any other parties and is actively endeavoring to evade service.

**FACTS**

1. On or about December 21, 2023, Plaintiff initiated the subject partition action by filing a Summons and Complaint in this Court.
2. Plaintiff obtained Defendant's address from prior knowledge, current legal proceedings, and other public records.
3. Plaintiff hired ABC Legal, a company engaged in the business of performing skip-traces and serving legal documents, to serve the Summons and Complaint on Defendant.

4. ABC Legal attempted service on Defendant on January 10, 2024, January 12, 2024, January 14, 2024, and January 16, 2024. However, these attempts were unsuccessful.
5. ABC Legal returned a signed proof of non-service document which has been filed with this Court.
6. In an attempt to further investigate the location of Defendant, ABC Legal ran a skip trace on Defendant, which confirmed Defendant resides at the location where ABC Legal had attempted service of process on Defendant.
7. Further, ABC Legal or its representatives have spoke with the neighboring property owner(s) and confirmed Defendant lives at the location where ABC Legal had attempted service of process on Defendant.
8. ABC Legal again attempted to serve Defendant following the skip trace on March 4, 2024, March 10, 2024, March 13, 2024, and March 17, 2024.
9. On March 17, 2024, Timothy Allen, a representative of ABC Legal, spoke with an unknown individual who identified themselves as the resident of the location; however, the person refused to open the door.
10. ABC Legal returned a second signed proof of non-service document which has been filed with this Court.
11. To date the Defendant has not attempted to contact Plaintiff's attorney or process server.

#### APPLICABLE LAW

S.C. Code Ann. § 15-9-710 authorizes service of the summons be made by publication when, after due diligence, the person to be served cannot be found within the State and that fact appears by affidavit to the satisfaction of the court...and it in like manner appears that the cause of action exists against the defendant in respect to whom the service is to be made or that he is a

proper party to an action relating to real property in this state...when the subject of the action is real or personal property in this State and the defendant has or claims a lien or interest, actual or contingent, therein or the relief demanded consists wholly or partly in excluding the defendant from any interest or lien therein.

**CONCLUSION OF LAW**

Based on this Motion and the affidavits of non-service filed with this Court, which are incorporated herein by reference, I find that the Plaintiff is entitled to effectuate service by publication regarding Defendant.

**WHEREFORE**, Plaintiff moves this Court for an order of service by publication.

**IT IS THEREFORE ORDERED**, that Plaintiff is granted leave to effectuate service by publication pursuant to S.C. Code § 15-9-740 in the Post & Courier, a newspaper of common circulation in Charleston County.

\_\_\_\_\_, 2024.

\_\_\_\_\_  
Presiding Judge for Charleston County

ISO MOVE:

s/Logan S. Davis  
Logan S. Davis, Esq.  
Graves & Davis, LLC  
125 Wappoo Creek Dr.  
Bldg. E, Suite 102  
Charleston, SC 29412  
Phone: 843-805-4649  
Facsimile: 843-620-1047  
Ldavis@gravesdavis.com  
Attorney for the Plaintiffs

Date: April 16, 2024



**Charleston Common Pleas**

**Case Caption:** Danielle C. Brown VS Crystal Brown Nwaneri  
**Case Number:** 2023CP1006212  
**Type:** Order/Publication

**So Ordered**

**s/Julie J. Armstrong, Charleston County Clerk of Court, by BLC**

Electronically signed on 2024-04-18 12:48:55 page 2 of 4

ELECTRONICALLY FILED - 2024 Apr 18 12:47 PM - CHARLESTON - COMMON PLEAS - CASE#2023CP1006212

# EXHIBIT C

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v:

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER FOR ENTRY OF DEFAULT**

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRPC for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]

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OCT 06 2025

SC Court of Appeals



**Charleston Common Pleas**

**Case Caption:** Danielle C Brown VS Crystal Brown Nwaneri  
**Case Number:** 2023CP1006212  
**Type:** Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

**EXHIBIT D**

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

DANIELLE C. BROWN,  
Plaintiff,

v.

CRYSTAL BROWN NWANERI,  
Defendant.

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER OF REFERENCE TO  
THE MASTER-IN-EQUITY**

UPON reading the Plaintiff's Motion for Reference to the Master-in-Equity, and upon consideration of same, and it being made to appear to my satisfaction that this matter involves a partition action to real property.

THEREFORE, IT IS ORDERED, ADJUDGED and DECREED that this case be, and the same is hereby, referred pursuant to SCRPC Rule 53 to The Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, to take testimony and issue a Final Decree, with any appeal from the Master to be directly to the South Carolina Supreme Court or the Court of Appeals.

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Master-in-Equity is given authority to hear any and all post-trial motions, including, but not limited to, motions under Rules 52, 59 and 60, SCRPC.

AND IT IS SO ORDERED!

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]

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OCT 06 2025  
SC Court of Appeals



**Charleston Common Pleas**

**Case Caption:** Danielle C. Brown VS Crystal Brown Nwaneri

**Case Number:** 2023CP1006212

**Type:** Order/Referred to Master or Special Referee

**So Ordered**

**s/Julie J. Armstrong, Charleston County Clerk of  
Court, by BLC**

Electronically signed on 2024-09-19 11:25:09 page 2 of 2

# EXHIBIT E

----- Forwarded message -----

From: MIELawClerk <MIELawClerk@charlestoncounty.org>  
Date: Mon, Aug 25, 2025 at 11:17 AM  
Subject: RE: Clarification re: Hearing Scheduled for August 25, 2025  
To: Crystal Brown <crystal.brown@gmail.com>, ldavis@gravesdavis.com <ldavis@gravesdavis.com>  
Cc: Martha S. Dennis <MDennis@charlestoncounty.org>, Tyler Graves <tgraves@gravesdavis.com>

Good morning,

Upon review of the communications and filings in this case, Judge Scarborough has determined that the Defendant did receive proper notice of the hearing and will proceed with the in-person hearing scheduled today for 2:00 p.m. The Court will not allow for the virtual or telephone participation by either party. Additionally, this Court notes that this hearing was continued from the January 29, 2025 date and that the Defendant was found to be in default in September 2024. Thus, the partition hearing set for 2:00 p.m. today will proceed as previously scheduled.

Thank you very much.

Lillian P. Wilkerson, Esq.  
Judicial Law Clerk  
Charleston County Master in Equity  
100 Broad Street, Suite 266  
Charleston, SC 29401  
Ph: (843) 958-5075  
MIELawClerk@charlestoncounty.org

From: Crystal Brown <crystal.brown@gmail.com>  
Sent: Monday, August 25, 2025 10:25 AM  
To: ldavis@gravesdavis.com  
Cc: MIELawClerk <MIELawClerk@charlestoncounty.org>; Martha S. Dennis <MDennis@charlestoncounty.org>; Tyler Graves <tgraves@gravesdavis.com>  
Subject: Clarification re: Hearing Scheduled for August 25, 2025

**CAUTION:** This email originated outside of Charleston County. Do not click links or open attachments from unknown senders or suspicious emails. If you are not sure, please contact IT helpdesk.

Dear Ms. Wilkerson and Honorable Court:

I write to clarify the record regarding today's scheduled hearing. Contrary to Plaintiff's misrepresentations below, I have not consented to, nor requested, that the hearing proceed by WebEx or any other virtual platform. Plaintiff's counsel's offer of a WebEx link is procedurally immaterial unless and until the Court orders such an appearance.

My request remains exactly as stated in my prior correspondence; if the Court nevertheless elects to proceed with the hearing over my timely objections, I respectfully request leave to participate by telephone in order to mitigate the prejudice resulting from insufficient and defective notice. This conditional request in no way constitutes a waiver of my objections or consent to the proceeding.

I also preserve my objection to Plaintiff's memorandum in support, which was filed the business day before the hearing, among other improper filings. That submission was untimely and prejudicial and should be stricken from the record.

In light of the hearing scheduled for 2:00 p.m. today, I respectfully request that the Court advise of its position at the earliest possible time so that I may make the necessary logistical arrangements.

Respectfully,

Crystal Brown Nwaneri

Defendant, Pro Se

On Mon, Aug 25, 2025 at 10:11 AM Logan Davis <ldavis@gravesdavis.com> wrote:

Ms. Wilkerson,

While we stand firm that notice has been effectuated, in an effort to go forward with this hearing, we are open to a virtual hearing. However, if the Court is willing to accommodate Defendant's request to have a virtual hearing, we would respectfully request it to be conducted via WebEx. Of course, we still plan on appearing at Court today unless the Court instructs otherwise.

Further, I wanted to note that Plaintiff also lives out of state; however, she has made accommodations to be here for the hearing.

Thank you all for your time and attention to this matter,

Sincerely,

Logan S. Davis, Esq.  
Partner/Attorney  
Graves & Davis, LLC

04/08/25 12:24

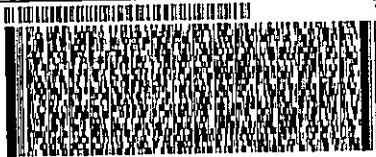
ORIGIN ID: FMEA (917) 651-8546  
CRYSTAL BROWN  
17293 OAKWOOD LODGE LN STE 65  
PINEY POINT, MD 20674  
UNITED STATES, US

SHIP DATE: 30SEP25  
ACTWGT: 0.40 LB  
CARD: 6984091/65FE2621  
BILL CREDIT CARD

Part # 150001 2447 9816/25 06/26

TO ATTN: CATHERINE S. HARRIS  
JENNY A. KITCHINGS, CLERK OF COURT  
1220 SENATE ST

COLUMBIA SC 29201  
SC Court of Appeals

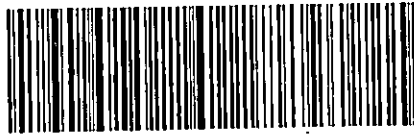


THU - 02 OCT 5:30P  
\*\* 2DAY \*\*

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0201

4Z COLBG

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SC-US CAE



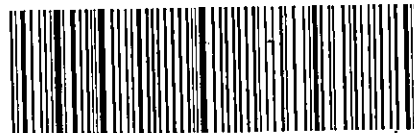
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FRI - 03 OCT AA  
\*\* 2DAY \*\*

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# FedEx



PAP 21

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action by packing your items for packing tips.

553-1584  
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