

**RECEIVED**

**Nov 10 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

MIKELL R. SCARBOROUGH, MASTER IN EQUITY

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Appellate Case No. 2025-001058

Tomeka Shayron Middleton, Appellant,

v.

Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pickney, Abraham Fields, Joseph Fields, Jerome Johnson, Robert Johnson, Mildred Johnson, Vanessa Johnson, Florence Singleton, Edward Givens, Delores Skipper, Phillip Johnson, Claudine Johnson, Kathleen Clement, Dean Clement, Corvetta Grant, Deedra Grant and JOHN DOE, adults, RICHARD ROE, infants, insane persons, incompetents and persons in the military service of the United States of America, being fictitious names designating as a class any unknown person or persons who may be an heir, distribute, devisee, legatee, widower, widow, assign, administrator, executor, creditor, successor, personal representative, issue or alienee of Robert Fields, Ella Walker, Jerome Johnson, Robert Johnson, Mildred Johnson, Oliver Clement and Florence Singleton all of whom are deceased, and any other or all other persons or legal entities, known and unknown, claiming any right, title, interest or estate in or lien upon the parcel of real estate described in the Lis Pendens and Complaint herein filed, Defendants,

of whom Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pickney, Abraham Fields, and Joseph Fields are the Respondents.

Appellate Case No. 2025-001058

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RETURN TO APPELLANT'S MOTION TO STAY

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The Appellant claims that she was not served or put on notice of Respondents' post-trial Motions/Orders, including, but not limited to, Motion for Bond; Order for Bond; and Supplemental Order for Eviction.

Respondents contend that Appellant was personally served with all the foregoing, based on the Exhibits and Affidavit filed with this Return

The Respondents do admit that mailings may have had an incorrect address. However, as of this date, no mailings have been returned by the U.S. Postal Service.

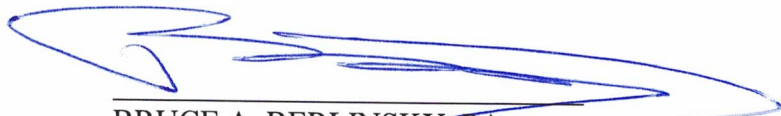
More importantly, the mailings were in addition to actual service of all the aforesaid filings as evidenced by the Affidavit of Service filed with the Charleston County Clerk of Court.

Additionally, Respondents attach hereto an Affidavit of Steve Harris, who is the process server who actually served the Appellant with all the aforesaid filings, together with all other filings in this case. As set forth in said Affidavit, Mr. Harris is well aware of who the Appellant is and what type of vehicles she drives.

This is the Appellant continuing to act with unclean hands and to misrepresent/deceive the Court as she has throughout this matter as evidenced by the Master's Decree and Final Order, as well as numerous violations of the lower court's Restraining Order.

Based on the foregoing, the Motion to Stay should be denied and the Charleston County Sheriff should move forward with the eviction.

Respectfully submitted,



~~BRUCE A. BERLINSKY, PA~~  
Bruce A. Berlinsky, Esquire  
One Carriage Lane, Bldg. F  
Charleston, SC 29407  
Telephone: (843) 852-2202  
Email: bruce@berlinskylawfirm.com  
*Attorney for Respondents*

Charleston, South Carolina  
November 10<sup>th</sup>, 2025

# **EXHIBIT 1**

**(Affidavit of  
Steve Harris)**

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )  
Tomeka Shayron Middleton, )  
 )  
Plaintiff, )  
 )  
versus )  
 )  
Frederick Fields, et al., )  
 )  
Defendants. )  
\_\_\_\_\_ )

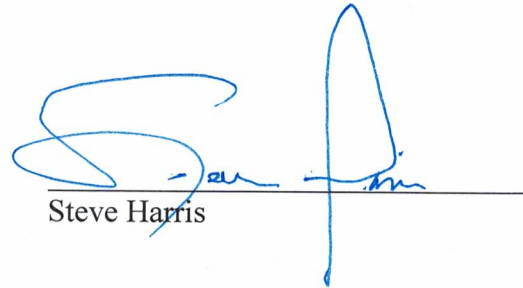
IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-10-05234

**AFFIDAVIT  
OF  
STEVE HARRIS**

PERSONALLY, appeared before me Steve Harris, who being duly sworn, deposes and says that:

1. I am employed by Process Service, Inc. and have been so for 7 years.
2. I am familiar with the requirements of process service in South Carolina.
3. That I have served numerous pleadings/filings on Plaintiff, Tomeka Shayron Middleton, at the River Road property and am quite familiar with where she resides.
4. Although and despite the street number being incorrect, the dwelling where Plaintiff, Tomeka Shayron Middleton, was served is in fact her residence.
5. At all times that the Motion for Bond and Order for Bond were attempted to be served on Plaintiff, Tomeka Shayron Middleton, she was home and inside the residence, but she refused to come to the door. I am also familiar with her vehicles, and they were all in her driveway.

6. Because Plaintiff, Tomeka Shayron Middleton, refused to come to the door for actual service, I taped in a clear, waterproof envelope to the door all the aforesaid filings, as evidenced by pictures attached hereto.
7. I know that Plaintiff, Tomeka Shayron Middleton, was home on all attempts to serve her as I could hear her inside the house and on one of the occasions, William Staley, Tomeka Shayron Middleton's former boyfriend, advised me that she was inside but would not answer the door.
8. In my opinion, Plaintiff, Tomeka Shayron Middleton, would not answer the door to intentionally avoid service of the papers as I had served her so many times in the past that she knew who I was and knew why I was there.



Steve Harris

SWORN to before me this 10<sup>th</sup>  
day of November, 2025.

Jessie J. Byrd  
Notary Public for South Carolina  
My Commission Expires: 2/7/2033



# **EXHIBIT 2**

**(Affidavit of  
Service dated  
7/23/25)**

**AFFIDAVIT OF SERVICE**

State of South Carolina

County of Charleston

Common Pleas Court

Case Number: 2021-CP-10-05234 Court Date: 7/30/2025 12:00 pm

Plaintiff:  
**TOMEKA SHAYRON MIDDLETON**

vs.

Defendant:  
**FREDERICK FIELDS, ET AL.,**

For:  
Bruce A. Berlinsky, Esq.  
P. O. Box 206  
Charleston, SC 29402

Received by PROCESS SERVICE, INC. to be served on **TOMEKA SHAYRON MIDDLETON, 3074 RIVER RD., JOHNS ISLAND, SC 29455.**

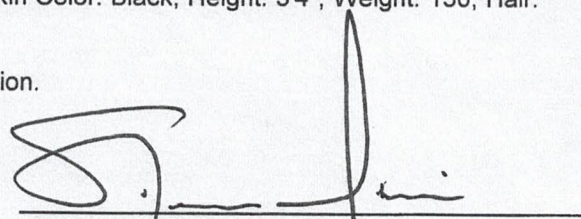
I, STEVE HARRIS, being duly sworn, depose and say that on the **23rd day of July, 2025** at 1:35 pm, I:

**PERSONALLY** served by delivering a true copy of the **NOTICE OF HEARING, NOTICE OF MOTION AND MOTION FOR BOND** to: **TOMEKA SHAYRON MIDDLETON** at the address of: **3074 RIVER RD., JOHNS ISLAND, SC 29455.**

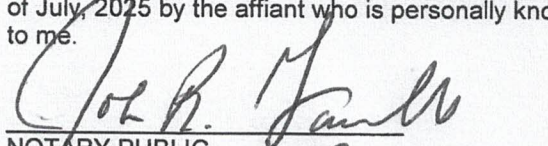
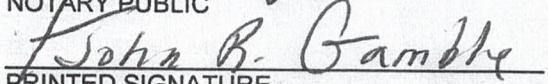
**Military Status:** Based upon inquiry of party served, defendant is not in the military service of The United States of America.

**Description of Person Served:** Age: 46, Sex: F, Race/Skin Color: Black, Height: 5'4", Weight: 150, Hair: Black, Glasses: N

I am over eighteen and have no interest in the above action.

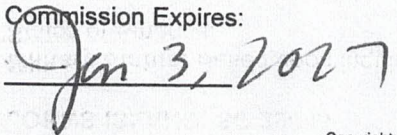
  
\_\_\_\_\_  
**STEVE HARRIS**  
Process Server

Subscribed and Sworn to before me on the 24th day of July, 2025 by the affiant who is personally known to me.

  
\_\_\_\_\_  
NOTARY PUBLIC  
  
\_\_\_\_\_  
PRINTED SIGNATURE

**PROCESS SERVICE, INC.**  
P.O. Box 20097  
Charleston, SC 29413  
(843) 577-2355

Our Job Serial Number: LEX-2025001802

Commission Expires:  


# **EXHIBIT 3**

**(Affidavit of  
Service dated  
8/15/25)**

**AFFIDAVIT OF SERVICE**

**State of South Carolina**

**County of Charleston**

**Common Pleas Court**

Case Number: 2021-CP-10-05234

Plaintiff: **TOMEKA SHAYRON MIDDLETON**

vs.

Defendant: **FREDERICK FIELDS, ET AL.,**

For:

Bruce A. Berlinsky, Esq.

P. O. Box 206

Charleston, SC 29402

Received by **PROCESS SERVICE, INC.** to be served on **TOMEKA SHAYRON MIDDLETON, 3092 RIVERS ROAD, JOHNS ISLAND, SC 29455.**

I, **STEVE HARRIS**, being duly sworn, depose and say that on the **15th day of August, 2025** at 1:10 pm, I:

**POSTED** by attaching a true copy of the **ORDER FOR BOND, ELECTRONIC SIGNATURE** with the date and hour of service endorsed thereon by me, to a conspicuous place on the property of the within named person's residence, at the address of **3092 RIVERS ROAD, JOHNS ISLAND, SC 29455.**

**Additional Information pertaining to this Service:**

8/12/2025 1:37 pm Attempted service at 3092 RIVERS ROAD, JOHNS ISLAND, SC 29455. No answer at the door and 3 cars were in the driveway. Attempted a phone contact with no answer.

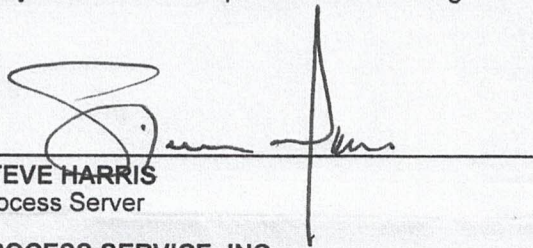
8/13/2025 2:43 pm Attempted service at 3092 RIVERS ROAD, JOHNS ISLAND, SC 29455. No answer at the door and 2 cars were in the driveway. Attempted a phone contact with the respondent, got no response. Attempted another phone number and reached the respondent's former husband ( William Staley) he advised that the respondent would be home around 6 p.m..

8/13/2025 6:35 pm Attempted service at 3092 RIVERS ROAD, JOHNS ISLAND, SC 29455. No answer at the door. Heard a child's voice inside along with a dog barking. Knocked on the door several times.

Recieved a phone call from William Staley saying that the respondent was not going to open the door for service and that the respondent was at home for all of the attempts. There were 3 cars in the driveway.

8/15/2025 1:54 pm On permission from the Law Firm of Bruce Berlinsky. The documents were affixed to the respondent's front door in a waterproof bag per Jessica Reynolds. Still no response after knocking on the door. 3 vehicles are still in the driveway.

I am over eighteen and have no interest in the above action.

  
\_\_\_\_\_  
**STEVE HARRIS**  
Process Server

Subscribed and Sworn to before me on the 18th day of August, 2025 by the affiant who is personally known to me.

**PROCESS SERVICE, INC.**  
**P.O. Box 20097**  
**Charleston, SC 29413**  
**(843) 577-2355**

Our Job Serial Number: LEX-2025001938

  
\_\_\_\_\_  
**NOTARY PUBLIC**  
  
\_\_\_\_\_  
**PRINTED SIGNATURE**

Commission Expires:

June 3, 2031

# **EXHIBIT 4**

**(Affidavit of  
Service dated  
10/1/25)**

**AFFIDAVIT OF SERVICE**

State of South Carolina

County of Charleston

Common Pleas Court

Case Number: 2021-CP-10-05234

Plaintiff: **TOMEKA SHAYRON MIDDLETON**

vs.

Defendant: **FREDERICK FIELDS, ET AL.,**

For:

Bruce A. Berlinsky, Esq.

P. O. Box 206

Charleston, SC 29402

Received by PROCESS SERVICE, INC. to be served on **TOMEKA SHAYRON MIDDLETON, 3092 RIVER ROAD, JOHNS ISLAND, SC 29455.**

I, **STEVE HARRIS**, being duly sworn, depose and say that on the **1st day of October, 2025** at **11:55 am**,

**POSTED** by attaching a true copy of the **LETTER DATED SEPTEMBER 30, 2025, COPY OF MASTER DEED, AFFIDAVIT ,FINAL ORDER, ELECTRONIC SIGNATURE PAGE** with the date and hour of service endorsed thereon by me, to a conspicuous place on the property of the within named person's residence, at the address of **3092 RIVER ROAD, JOHNS ISLAND, SC 29455.**

**Military Status:** Based upon inquiry of party served, defendant is not in the military service of The United States of America.


**Additional Information pertaining to this Service:**

9/30/2025 3:05 pm Attempted service at 3092 RIVER ROAD, JOHNS ISLAND, SC 29455. No answer at the door. 2 cars ( both belong to the responden) were in the yard. An elderly black woman was sitting in a chair in the front yard. She was very uncooperative and refused to be of any help.

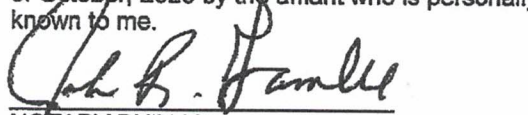

10/1/2025 11:55 am Attempted service at 3092 RIVER ROAD, JOHNS ISLAND, SC 29455. No answer at the door. 3 cars were in the yard. Could her a dog inside. Tried knocking on the door several times with no response. As per instructions the documents were placed in a waterproof bag and taped to the front door under a taped bag of documents taped to the front door from aprox. 6 weeks prior. A photo is available.

10/1/2025 12:08 pm Respondent was apparently inside but refused to open the door. As per instructions the documents were placed in a waterproof bag then sealed Up and taped to the front door of the residence under a waterproof bag that was taped to the door aprox. 6 weeks prior.

I am over eighteen and have no interest in the above action.

  
**STEVE HARRIS**  
Process Server

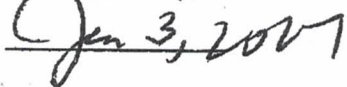
Subscribed and Sworn to before me on the 2nd day of October, 2025 by the affiant who is personally known to me.

  
NOTARY PUBLIC  
  
PRINTED SIGNATURE

**PROCESS SERVICE, INC.**  
P.O. Box 20097  
Charleston, SC 29413  
(843) 577-2355

Our Job Serial Number: LEX-2025002438

Commission Expires:



**EXHIBIT 5**  
**(Restraining  
Order dated  
10/26/22)**

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )  
Tomeka Shayron Middleton, )  
 )  
Plaintiff )  
 )  
v. )  
 )  
Frederick Fields, et al. )  
 )  
Respondent. )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-10-05234

**RESTRAINING ORDER**

This matter comes before me pursuant to Fields Defendant’s for Motion Restraining Order and Motion to Refer to Master in Equity.

NOW, THEREFORE, upon motion of Bruce A. Berlinsky, Esquire, attorney for Defendants, Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields, and with the consent of J. Chris Lanning, Esquire, attorney for Plaintiff, Tomeka Shayron Middleton, it is hereby

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, and the Fields Defendants or their representatives or anyone acting on their behalf shall not build, act on any previously issued building permit or allow anyone to erect, construct, or undertake to do any work or construction of any kind on property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not rent, lease, sublease, or in any way give any third party the right to occupy or dwell on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not threaten or otherwise intimidate bodily harm or verbal abuse towards any of the Fields Defendants or their representatives or anyone acting on their behalf; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not threaten or otherwise intimidate bodily harm or verbal abuse towards Abraham Fields, who resides in the dwelling next door to Tomeka Shayron Middleton; and, it is further

ORDERED, that none of the Fields Defendants or their representatives or anyone acting on their behalf shall rent, lease, sublease, or in any way give any third party the right to occupy or dwell on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172, nor threaten or otherwise intimidate bodily harm or verbal abuse towards Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley. This does not prohibit the Fields from management and operation of the current Tenants occupying the said commercial building/spaces on said property. Likewise, Tomeka Shayron Middleton or her guests and invitees shall not threaten or otherwise intimidate bodily harm or verbal abuse to any of the Fields Defendants or their guests and invitees, on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton nor her guests or invitees shall have access to, or use of the basketball court located on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that both parties reserve any and all rights with regard to the subject property not addressed in this Order; and, it is further

ORDERED, that the above styled cause of action shall be referred to the Honorable Mikell R. Scarborough, Master in Equity for Charleston County, for the purpose of taking testimony and making findings of fact and conclusions of law, including any post trial motions or other matters and to render a final decree directly appealable to the Supreme Court of South Carolina; and, it is further

ORDERED, that this Order shall remain in full force and effect pending a hearing on the merits addressing all issues and/or matters before this Honorable Court or further Order of this Court.

AND IT IS SO ORDERED!

*\*Signatures on Following Page\**

Charleston, South Carolina  
October \_\_\_\_\_, 2022

---

Honorable Jennifer McCoy  
Charleston County Court of Common Pleas

WE CONSENT:

s/Bruce A. Berlinsky  
Bruce A. Berlinsky, Esq.  
One Carriage Ln., Bldg. F  
Charleston, SC 29407  
*Attorney for Defendants,  
Frederick Fields, Anna White,  
Robert Fields, Jr., Juanita Pinckney,  
Abraham Fields, and Joseph Fields*

s/J. Chris Lanning  
J. Chris Lanning, Esq.  
12-A Carriage Ln.  
Charleston, SC 29407  
*Attorney for Plaintiff,  
Tomeka Shayron Middleton*



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al

**Case Number:** 2021CP1005234

**Type:** Order/Other

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2022-10-26 10:45:20 page 4 of 4

# **EXHIBIT 6**

**(Final Order  
dated 5/20/25)**

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 Tomeka Shayron Middleton, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Frederick Fields, Anna White, Robert )  
 Fields, Jr., Juanita Pinckney, Abraham )  
 Fields, Joseph Fields, Jerome Johnson, )  
 Robert Johnson, Mildred Johnson, )  
 Vanessa Johnson, Florence Singleton, )  
 Edward Givens, Delores Skipper, )  
 Phillip Johnson, Claudine Johnson, )  
 Kathleen Clement, Dean Clement, )  
 Corvetta Grant, Deedra Grant and )  
 JOHN DOE, adults, RICHARD ROE, )  
 infants, insane persons, incompetents )  
 and persons in the military service of )  
 the United States of America, being )  
 fictitious names designating as a class )  
 any unknown person or persons who )  
 may be an heir, distribute, devisee, )  
 legatee, widower, widow, assign, )  
 administrator, executor, creditor, )  
 successor, personal representative, )  
 issue or alienee of Robert Fields, Ella )  
 Walker, Jerome Johnson, Robert )  
 Johnson, Mildred Johnson, Oliver )  
 Clement and Florence Singleton all of )  
 whom are deceased, and any or all )  
 other persons or legal entities, known )  
 and unknown, claiming any right, title, )  
 interest or estate in or lien upon the )  
 parcel of real estate described in the )  
 Lis Pendens and Complaint herein filed, )  
 )  
 Defendants. )  
 )  
 \_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
 FOR THE NINTH JUDICIAL CIRCUIT  
 CASE NO.: 2021-CP-10-05234

**FINAL ORDER**

THIS SUIT was brought to determine adverse claims so as to quiet title to certain real property in Charleston County and to partition the said property among those persons to be

determined to be legal owners.

On or about July 24, 2023, Mikell R. Scarborough, Master in Equity for Charleston County, issued his Order quieting title to the subject property and determining the heirs and their percentage interest in the same.

On March 26, 2025, this Court held a hearing in furtherance of the January 9, 2025, July 25, 2024 and May 8, 2024 hearings and consequent Orders to take testimony and receive evidence to address all remaining issues in the case. Attending was Bruce A. Berlinsky, Esquire, attorney for Defendants, Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields; Defendants, Joseph Fields, Frederick Fields, and Anna White; J. Chris Lanning, Esquire, attorney for the Plaintiff; Plaintiff, Tomeka Shayron Middleton; and the following parties/witnesses: Helen W. Fields, Anna F. White, JaNesha F. Dillahunt, Joseph Fields, Frederick Fields, Cynthia Fields, and Freddie Davis, III. William H. Jordan, Esquire, Guardian Ad Litem, was not present. Since filing his Answer and Report of Guardian Ad Litem on May 9, 2023, no one has contacted Mr. Jordan claiming to be an heir of any of the identified deceased parties or having an interest in the subject property.

After consideration of the testimony and the evidence, this Court makes the following Findings of Fact and Conclusions of Law:

1. This Court is a court of equity and, as such, has the inherent power to do what is just and proper and in the interest of justice and to seek equity and do equity.
2. Plaintiff, Tomeka Shayron Middleton, acquired a 1.66% undivided interest in the subject property in September 2022, during the pendency of this action. Defendants Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields (hereinafter referred to as "Fields family") own the remaining 98.34% undivided interest in the subject property and together with their ancestors

and forebears have owned their interest in the subject property, as well as the surrounding Fields farm acreage for over one hundred (100) years.

3. The Fields family has worked this farm and associated business on the subject property for over one hundred (100) years. Further, the Fields family owns all the property surrounding the subject property and across the street from the subject property.
4. It has become apparent to the Court that Plaintiff and the Fields family cannot live peacefully near each other. This is evident by the continual violations of the Restraining Order of Judge McCoy filed October 26, 2022. It is further evidenced by the repeated Rules to Show Cause and resulting Orders finding Plaintiff in contempt of said Restraining Order for violating the same. Thus, I find that the record is abundantly clear of multiple violations of the Restraining Order filed October 26, 2022 by Plaintiff, including, but not limited to, Sheriff's incident reports, DHEC code violations, and Charleston County Building Services code violations. The record also contains evidence of a cease and desist order from Charleston County Building Services for the placement of at least three (3) accessory buildings, by Plaintiff, on the subject property that were converted into dwelling units which did not have permitted water, sewer, or electric hookups/connections and were connected to the said accessory buildings through extension cords and water hoses running from the dwelling occupied by Plaintiff. This is further evidenced by leases/subleases from Plaintiff to occupants of the illegally converted accessory buildings.
5. I find Plaintiff's testimony and "story" to not be credible or believable. This is based on the testimony presented at both this recent hearing and throughout this case. Plaintiff has disrespected the rule of law by her actions both before and during the

pendency of this action. Further, Plaintiff has disrespected this Court by her actions and multiple violations of the Restraining Order in place since October 26, 2022.

6. I find that Plaintiff has acted and operated with “unclean hands” in her occupancy of the dwelling on the subject property since September 2009 until she acquired her interest in the subject property in September 2022 and has continued to act and operate with “unclean hands” since she acquired an interest in the property as is evidenced by my findings herein and by my additional finding of multiple violations of the lease prior to her acquiring an interest in the property.
7. I find Freddie Davis, III, an arborist and forestry school graduate of Mississippi State University to be an expert, without objection by Plaintiff’s attorney. His expert testimony is that the value of the timber improperly cut by Plaintiff to be Nine Hundred and 00/100 (\$900.00) Dollars and the cost to replant and care for the lost trees to be Two Thousand Eight Hundred and 00/100 (\$2,800.00) Dollars for total tree damage of Three Thousand Seven Hundred and 00/100 (\$3,700.00) Dollars.
8. Based on the valuation established in this case pursuant to the Clementa C. Pinckney Act in the Court’s January 10, 2025 Order, this Court found the valuation of the subject property to be Four Hundred Thirty-Three Thousand and 00/100 (\$433,000.00) Dollars, making Plaintiff’s 1.66% interest worth Seven Thousand One Hundred Eighty Seven and 80/100 (\$7,187.80) Dollars and the Fields family 98.34% interest worth Four Hundred Twenty Five Thousand Eight Hundred Twelve and 20/100 (\$425,812.20) Dollars.
9. I find from the testimony of both Plaintiff and her boyfriend/fiancée, Eugene Elmore, that no evidence has been presented indicating the Plaintiff has the ability to purchase the interest of the Fields family in the subject property.

10. The purpose of the Clementa C. Pinckney Act has a public policy to keep property in the hands of the family, if possible. I find that the Fields family does have the ability to purchase the interest of Plaintiff in the subject property so that the subject property remains in the Fields family which I find consistent with the public policy of the Pinckney Act.
11. I find that Plaintiff has failed to exercise her right as a non-petitioning co-tenant to purchase the interests of the petitioning co-tenants under Section 15-61-370 in that she did not provide ten (10) days notice to exercise said right prior to the hearing. In addition, I find in more detail hereinabove her inability to purchase the interest of the non-partitioning co-tenants even if she had properly exercised said interest to purchase.
12. I find that the Fields family has the right to purchase the interest of the Plaintiff through OWELTY. Based on the testimony and evidence presented during the pendency of this entire case, I am setting the value of Plaintiff's interest in the property at Nine Thousand Nine Hundred Ten and 68/100 (\$9,910.68) Dollars; however, I am deducting the attorney award of One Thousand Nine Hundred Ten and 68/100 (\$1,910.68) Dollars that Plaintiff was ordered to pay in my previous Order dated May 11, 2024 and not deducting any amount for the tree damage. Therefore, the Fields family shall pay this Court the sum of Eight Thousand and 00/100 (\$8,000.00) Dollars and the Court shall transfer and pay the same to Plaintiff. Upon payment of the Eight Thousand and 00/100 (\$8,000.00) Dollars, this Court shall issue a Master's Deed for Plaintiff's 1.66% undivided interest in the subject property to the Fields family as directed by their counsel.

13. I find that Plaintiff shall vacate the subject property within thirty (30) days of payment of the aforesaid Eight Thousand and 00/100 (\$8,000.00) Dollars. This Court shall retain jurisdiction in this case to see that all terms of this Order are fulfilled.

Based on the foregoing facts and conclusions of law, it is hereby,

ORDERED, that the Fields family shall pay Plaintiff the sum of Eight Thousand and 00/100 (\$8,000.00) Dollars for her 1.66% undivided interest in the property which is the subject matter of this litigation and upon payment to this Court of the Eight Thousand and 00/100 (\$8,000.00) Dollars, this court shall issue a Master's Deed to the Fields family; and, it is further

ORDERED, that the undersigned is authorized to issue a Confirmatory Master's Deed confirming title in Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields; and, it is further

ORDERED, that Plaintiff shall vacate the subject property within thirty (30) days of the date of payment by the Fields family of Eight Thousand and 00/100 (\$8,000.00) Dollars; and, it is further

ORDERED, that the Sheriff of Charleston County put the Defendants, Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields in possession of the said premises without delay and to keep said Defendants in such peaceful possession and that the Plaintiff, or anyone claiming by, through, or under her be forever barred and foreclosed of any right, title, or interest in said property; and, it is further

ORDERED, that all terms and conditions of my Orders dated July 24, 2023, May 2, 2024, May 15, 2024, August 13, 2024, and January 10, 2025, not modified herein shall remain in full force and effect.

AND IT IS SO ORDERED!

---

Mikell R. Scarborough

Charleston County Master-In-Equity

Charleston, South Carolina  
\_\_\_\_\_, 2025.



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al  
**Case Number:** 2021CP1005234  
**Type:** Order/Other

So Ordered

s/Mikell R. Scarborough 3062

# **EXHIBIT 7**

**(Order for Bond  
dated 8/11/25)**

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 Tomeka Shayron Middleton, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Frederick Fields, Anna White, Robert )  
 Fields, Jr., Juanita Pinckney, Abraham )  
 Fields, Joseph Fields, Jerome Johnson, )  
 Robert Johnson, Mildred Johnson, )  
 Vanessa Johnson, Florence Singleton, )  
 Edward Givens, Delores Skipper, )  
 Phillip Johnson, Claudine Johnson, )  
 Kathleen Clement, Dean Clement, )  
 Corvetta Grant, Deedra Grant and )  
 JOHN DOE, adults, RICHARD ROE, )  
 infants, insane persons, incompetents )  
 and persons in the military service of )  
 the United States of America, being )  
 fictitious names designating as a class )  
 any unknown person or persons who )  
 may be an heir, distribute, devisee, )  
 legatee, widower, widow, assign, )  
 administrator, executor, creditor, )  
 successor, personal representative, )  
 issue or alienee of Robert Fields, Ella )  
 Walker, Jerome Johnson, Robert )  
 Johnson, Mildred Johnson, Oliver )  
 Clement and Florence Singleton all of )  
 whom are deceased, and any or all )  
 other persons or legal entities, known )  
 and unknown, claiming any right, title, )  
 interest or estate in or lien upon the )  
 parcel of real estate described in the )  
 Lis Pendens and Complaint herein filed, )  
 )  
 Defendants. )  
 )  
 \_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
 FOR THE NINTH JUDICIAL CIRCUIT  
 CASE NO.: 2021-CP-10-05234

**ORDER FOR BOND**

This matter comes before me pursuant to the filing by Defendants, Frederick Fields, Anna

White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields (hereinafter referred to as “Fields Family”) for a bond to stay the judgment pending appeal.

On August 6, 2025, a hearing was held at 10:00 a.m. Attending were Bruce A. Berlinsky, Esquire, attorney for the Fields Family, and several members of the family. The Plaintiff was given due notice of today’s hearing but did not appear.

After hearing arguments of counsel, this Court makes the following Findings of Fact and Conclusions of Law:

1. There have been numerous findings throughout this litigation of the Plaintiff disregarding Orders of the Court. As the matter had been continued before, the Court moved forward despite Plaintiff’s renewed request for a continuance.
2. Plaintiff is attempting to stay the Judgment/Order of this Court allowing the Fields Family to purchase Plaintiff’s interest in the subject property.
3. The Fields Family has deposited the purchase price of \$8,000.00, as set forth in my prior Order, into the trust account of their lawyer but, out of an abundance of caution, has not yet paid the same into the Court based on Plaintiff’s appeal to the South Carolina Court of Appeals.
4. I find that South Carolina Code Sections 18-9-130 and 18-9-120 provide, in part, that if the judgment appealed from directs the delivery of possession of real property, the execution of the judgment shall not be stayed unless a written undertaking be executed on the part of appellant, with two sureties.
5. I previously found in my Order filed January 10, 2025, that the appraised value of the subject property is \$433,000.00.

6. I will give Plaintiff credit for the \$8,000.00 she is entitled to for her interest in the subject property. Accordingly, Plaintiff shall post bond in the amount of \$425,000.00, with two sureties therein in order to stay the Order.
7. Additionally, I find that any rent Plaintiff is collecting from tenants on the property shall be paid to the Fields Family and covered by the aforesaid bond.
8. Plaintiff shall have two weeks from the date of the Order, namely, August 25, 2025, to post the aforesaid bond.
9. If Plaintiff fails to post the aforesaid bond, the Fields Family attorney shall pay the \$8,000.00 in his trust account into this Court and I will issue a Master's Deed conveying Plaintiff's interest in the subject property to the Fields Family, pursuant to South Carolina Code set forth hereinabove. If the bond is not posted, the automatic stay is not in force. This is pursuant to all previous Orders in this case as well as Rule 70 of the South Carolina Rules of Civil Procedure.

NOW, THEREORE, based on the foregoing facts and conclusions of law, it is hereby

ORDERED, that Plaintiff shall post an appeal bond with this Court in the amount of \$425,000.00, with two good sureties, no later than August 25, 2025, or the automatic stay of judgment shall be lifted and not of effect; and, it is further

ORDERED, that if Plaintiff fails to post the aforesaid bond by August 25, 2025, the Fields Family shall pay into this Court the sum of \$8,000.00 and the undersigned shall issue a Master's Deed to the Fields Family; and, it is further

ORDERED, that all terms and conditions of my Orders dated July 24, 2023, May 2, 2024, May 15, 2024, August 13, 2024, January 10, 2025, and May 20, 2025, not modified herein shall remain in full force and effect.

AND IT IS SO ORDERED!

Charleston, South Carolina  
August \_\_\_\_\_, 2025.

---

Mikell R. Scarborough  
Charleston County Master-In-Equity



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al

**Case Number:** 2021CP1005234

**Type:** Order/Other

So Ordered

s/Mikell R. Scarborough 3062

# **EXHIBIT 8**

**(Order - Rule to  
Show Cause  
and Restraining  
Order dated  
5/15/24)**

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )  
Tomeka Shayron Middleton, )  
 )  
 )  
Plaintiff, )  
 )  
versus )  
 )  
Frederick Fields, et al. )  
 )  
 )  
Defendants. )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-10-05234

**ORDER**  
**(Rule to Show Cause and**  
**Restraining Order)**

THIS Rule to Show Cause was brought as a result of Plaintiff's violation of the Order of the Honorable Jennifer B. McCoy dated October 26, 2022.

This matter was referred to the undersigned by the Restraining Order dated October 26, 2022, to take testimony, make findings of fact and conclusions of law, and enter a final order with all appeals to the Supreme Court of South Carolina.

On May 8, 2024, a hearing was held before me on Defendants' Rule to Show Cause at which testimony was taken and evidence offered. Attending were Bruce A. Berlinsky, Esquire, attorney for the Defendants, Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, Joseph Fields, and J. Chris Lanning, Esquire, attorney for the Plaintiff Tomeka Shayron Middleton.

After consideration of the testimony and evidence, this Court makes the following findings of fact and conclusions of law:

1. That on October 26, 2022, Honorable Jennifer B. McCoy executed a Restraining Order, which among other things, provided in Paragraph 2 that "Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, and the Fields

Defendants or their representatives or anyone acting on their behalf shall not build, act on any previously issued building permit or allow anyone to erect, construct, or undertake to do any work or construction of any kind on property identified as TMS Nos.: 318-00-00 173, 318-00-00-005, 318-00-00-006, and 318-00-00-172. A copy of the Restraining Order is filed in the Clerk of Court's office and incorporated herein by reference.

2. I find that, at a status conference held in this matter on April 22, 2024, Defendants' attorney presented pictures evidencing a dump truck and backhoe placed on the property occupied by Plaintiff and advised that he desired relief from the Court. Plaintiff's attorney advised the Court that the storage and placement of the dump truck and backhoe on the property does not violate the Restraining Order and Plaintiff has the right to store the equipment on the subject property.
3. I find that Plaintiff has allowed William Staley and/or others to operate the backhoe and dump truck on the subject property and allowed Mr. Staley and/or others to "erect, construct, and undertake to do any work or construction of any kind" on the subject property, as evidenced by pictures introduced into evidence collectively as Defendants' Exhibit 1.
4. I further find that Plaintiff allowed "her representatives or anyone acting on her behalf, including, but not limited to, William Staley" to do work on the property in violation of Judge McCoy's Restraining Order, as evidenced by the photographs admitted into evidence as Defendants' Exhibit 1.

5. I find that Plaintiff, William Staley, or anyone acting on Plaintiff's behalf or instructions should cease and desist from any further work or construction effective immediately upon conclusion of the hearing on May 8, 2024.
6. I find and conclude the work and/or construction that has been performed on the subject property should not have been done as it violates the Restraining Order.
7. I find and conclude that William Staley has no business being on the property or doing any work on the property and that he should be restrained from being anywhere on the property or doing so in the future. I further find and conclude that Plaintiff and William Staley have a child together but that any exercise of visitation or transfer of the child or children between Plaintiff and William Staley shall and must be done off-site from the subject property.
8. I find and conclude that Plaintiff shall pay attorney's fees to Bruce A. Berlinsky, Esquire, together with costs, incurred in prosecuting this Rule to Show Cause on behalf of Defendants in the amount of \$1,910.68.
9. I find and conclude that all costs for restoration of the subject property shall be held in abeyance until the final hearing on the merits.

The Court, being satisfied with its findings and conclusions, enters judgment thereon.

NOW, THEREFORE, based on the foregoing findings of fact and conclusions of law, it is hereby

ORDERED, that any and all work and/or construction done on the subject property, including, but not limited to, the work shown on Defendant's Exhibit 1, violates the Restraining Order of Honorable Jennifer B. McCoy dated October 26, 2022; and, it is further

ORDERED, that Plaintiff or anyone acting on Plaintiff's behalf and William Staley shall cease and desist from any further or additional work and/or construction on the subject property without further Order of this Court effective immediately; and, it is further

ORDERED, that Plaintiff, Plaintiff's agents, or William Staley shall remove the dump truck, backhoe, and any other equipment from the subject property no later than ten (10) days from the date of this hearing or be subject to further contempt powers of this Court; and, it is further

ORDERED, that William Staley is prohibited from being or setting foot on the subject property and that any exercise of visitation with the child he and Plaintiff share shall be off the property; and, it is further

ORDERED, that Plaintiff is in contempt of Honorable Jennifer B. McCoy's Restraining Order dated October 26, 2022, and that any penalties, costs, and/or fines for said contempt shall be held in abeyance pending the final hearing in this matter; and, it is further

ORDERED, that William Staley be held to the same constraints as those imposed on Plaintiff and himself in the Restraining Order of Honorable Jennifer B. McCoy dated October 26, 2022, and that he shall be served with a copy of this Order; and, it is further

ORDERED, that William Staley be subject to penalties and fines, including incarceration, for the violation of this Order or the violation of the Restraining Order of Honorable Jennifer B. McCoy dated October 26, 2022; and, it is further

ORDERED, that all terms and conditions of the Restraining Order of Honorable Jennifer B. McCoy dated October 26, 2022, not modified herein shall remain in full force and effect.

AND IT IS SO ORDERED!

---

Mikell R. Scarborough  
Charleston County Master in Equity

Charleston, South Carolina  
\_\_\_\_\_, 2024



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al

**Case Number:** 2021CP1005234

**Type:** Order/Other

So Ordered

s/Mikell R. Scarborough 3062

Electronically signed on 2024-05-15 11:50:53 page 6 of 6

# **EXHIBIT 9**

**(Rule to Show  
Cause dated  
5/2/24)**



The above-named Plaintiff is hereby notified that the Court may order additional costs and attorney's fees as a consequence of Plaintiff's failure to comply with the Restraining Order dated October 26, 2022, as heretofore ordered.

\_\_\_\_\_  
The Honorable Mikell R. Scarborough  
Charleston County Master in Equity

Charleston, South Carolina  
\_\_\_\_\_, 2024



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al

**Case Number:** 2021CP1005234

**Type:** Order/Rule To Show Cause

So Ordered

s/Mikell R. Scarborough 3062



ORDERED, that none of the Fields Defendants or their representatives or anyone acting on their behalf shall rent, lease, sublease, or in any way give any third party the right to occupy or dwell on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172, nor threaten or otherwise intimidate bodily harm or verbal abuse towards Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley. This does not prohibit the Fields from management and operation of the current Tenants occupying the said commercial building/spaces on said property. Likewise, Tomeka Shayron Middleton or her guests and invitees shall not threaten or otherwise intimidate bodily harm or verbal abuse to any of the Fields Defendants or their guests and invitees, on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton nor her guests or invitees shall have access to, or use of the basketball court located on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that both parties reserve any and all rights with regard to the subject property not addressed in this Order; and, it is further

ORDERED, that the above styled cause of action shall be referred to the Honorable Mikell R. Scarborough, Master in Equity for Charleston County, for the purpose of taking testimony and making findings of fact and conclusions of law, including any post trial motions or other matters and to render a final decree directly appealable to the Supreme Court of South Carolina; and, it is further

ORDERED, that this Order shall remain in full force and effect pending a hearing on the merits addressing all issues and/or matters before this Honorable Court or further Order of this Court.

AND IT IS SO ORDERED!

*\*Signatures on Following Page\**

---

Honorable Jennifer McCoy  
Charleston County Court of Common Pleas

Charleston, South Carolina  
October \_\_\_\_\_, 2022

WE CONSENT:

s/Bruce A. Berlinsky  
Bruce A. Berlinsky, Esq.  
One Carriage Ln., Bldg. F  
Charleston, SC 29407  
*Attorney for Defendants,  
Frederick Fields, Anna White,  
Robert Fields, Jr., Juanita Pinckney,  
Abraham Fields, and Joseph Fields*

s/J. Chris Lanning  
J. Chris Lanning, Esq.  
12-A Carriage Ln.  
Charleston, SC 29407  
*Attorney for Plaintiff,  
Tomeka Shayron Middleton*

ELECTRONICALLY FILED - 2022 Oct 26 11:08 AM - CHARLESTON - COMMON PLEAS - CASE#2021CP1005234  
ELECTRONICALLY FILED - 2024 Apr 30 11:09 AM - CHARLESTON - COMMON PLEAS - CASE#2021CP1005234  
ELECTRONICALLY FILED - 2024 May 02 2:33 PM - CHARLESTON - COMMON PLEAS - CASE#2021CP1005234



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al  
**Case Number:** 2021CP1005234  
**Type:** Order/Other

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2022-10-26 10:45:20 page 4 of 4

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# **EXHIBIT 10**

**(Rule to Show  
Cause dated  
12/15/22)**



The above named Defendants are hereby notified that the Court may order additional costs and attorney's fees as a consequence of Defendants' failure to comply with the Restraining Order dated October 26, 2022, as heretofore ordered.

**(JUDGE'S SIGNATURE PAGE TO FOLLOW)**



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al  
**Case Number:** 2021CP1005234  
**Type:** Order/Rule To Show Cause

So Ordered

s/Mikell R. Scarborough 3062

# EXHIBIT A

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON	)	CASE NO.: 2021-CP-10-05234
	)	
Tomeka Shayron Middleton,	)	
	)	
Plaintiff	)	<b>RESTRAINING ORDER</b>
	)	
v.	)	
	)	
Frederick Fields, et al.	)	
	)	
Respondent.	)	
_____	)	

This matter comes before me pursuant to Fields Defendant's for Motion Restraining Order and Motion to Refer to Master in Equity.

NOW, THEREFORE, upon motion of Bruce A. Berlinsky, Esquire, attorney for Defendants, Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields, and with the consent of J. Chris Lanning, Esquire, attorney for Plaintiff, Tomeka Shayron Middleton, it is hereby

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, and the Fields Defendants or their representatives or anyone acting on their behalf shall not build, act on any previously issued building permit or allow anyone to erect, construct, or undertake to do any work or construction of any kind on property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not rent, lease, sublease, or in any way give any third party the right to occupy or dwell on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not threaten or otherwise intimidate bodily harm or verbal abuse towards any of the Fields Defendants or their representatives or anyone acting on their behalf; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not threaten or otherwise intimidate bodily harm or verbal abuse towards Abraham Fields, who resides in the dwelling next door to Tomeka Shayron Middleton; and, it is further

ORDERED, that none of the Fields Defendants or their representatives or anyone acting on their behalf shall rent, lease, sublease, or in any way give any third party the right to occupy or dwell on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172, nor threaten or otherwise intimidate bodily harm or verbal abuse towards Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley. This does not prohibit the Fields from management and operation of the current Tenants occupying the said commercial building/spaces on said property. Likewise, Tomeka Shayron Middleton or her guests and invitees shall not threaten or otherwise intimidate bodily harm or verbal abuse to any of the Fields Defendants or their guests and invitees, on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton nor her guests or invitees shall have access to, or use of the basketball court located on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that both parties reserve any and all rights with regard to the subject property not addressed in this Order; and, it is further

ORDERED, that the above styled cause of action shall be referred to the Honorable Mikell R. Scarborough, Master in Equity for Charleston County, for the purpose of taking testimony and making findings of fact and conclusions of law, including any post trial motions or other matters and to render a final decree directly appealable to the Supreme Court of South Carolina; and, it is further

ORDERED, that this Order shall remain in full force and effect pending a hearing on the merits addressing all issues and/or matters before this Honorable Court or further Order of this Court.

AND IT IS SO ORDERED!

*\*Signatures on Following Page\**

---

Honorable Jennifer McCoy  
Charleston County Court of Common Pleas

Charleston, South Carolina  
October \_\_\_\_\_, 2022

WE CONSENT:

s/Bruce A. Berlinsky  
Bruce A. Berlinsky, Esq.  
One Carriage Ln., Bldg. F  
Charleston, SC 29407  
*Attorney for Defendants,  
Frederick Fields, Anna White,  
Robert Fields, Jr., Juanita Pinckney,  
Abraham Fields, and Joseph Fields*

s/J. Chris Lanning  
J. Chris Lanning, Esq.  
12-A Carriage Ln.  
Charleston, SC 29407  
*Attorney for Plaintiff,  
Tomeka Shayron Middleton*



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al  
**Case Number:** 2021CP1005234  
**Type:** Order/Other

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2022-10-26 10:45:20 page 4 of 4

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# **EXHIBIT 11**

**(Rule to Show  
Cause dated  
12/6/22)**

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )  
Tomeka Shayron Middleton, )  
 )  
 )  
Plaintiff, )  
 )  
 )  
versus )  
 )  
Frederick Fields, et al. )  
 )  
 )  
Defendants. )  
 )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-10-05234

**RULE TO SHOW CAUSE**

**TO: J. CHRIS LANNING, ESQ., ATTORNEY FOR PLAINTIFF AND TOMEKA SHAYRON MIDDLETON**

Upon reading and considering the attached Order of Honorable Jennifer B. McCoy, dated October 26, 2022, attached hereto as Exhibit "A", it is ordered that Tomeka Shayron Middleton, the Plaintiff herein, does in your proper persons or by your authorized representative to appear before the Honorable Mikell R. Scarborough, Master in Equity for Charleston County, on **the 9th day of January, 2023, at 3:00 p.m.**, or as soon thereafter as this matter can be scheduled and heard, at the Charleston County Courthouse, 100 Broad Street, Courtroom 2A, Charleston, South Carolina, 29401, then and there to

SHOW CAUSE if any you can, why Plaintiff should not be found in contempt for the willful violation of the Order of the Honorable Jennifer B. McCoy filed on October 26, 2022, and all sanctions of this Court, be invoked against you for failure to comply with the Restraining Order dated October 26, 2022, by having yourself or a representative cut down trees and allow your boyfriend to utilize basketball court.

The above-named Plaintiff is hereby notified that the Court may order additional costs and attorney's fees as a consequence of Plaintiff's failure to comply with the Restraining Order dated October 26, 2022, as heretofore ordered.

**(JUDGE'S SIGNATURE PAGE TO FOLLOW)**



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al

**Case Number:** 2021CP1005234

**Type:** Order/Rule To Show Cause

So Ordered

s/Mikell R. Scarborough 3062

Electronically signed on 2022-12-06 16:40:38 page 3 of 3

# EXHIBIT "A"

STATE OF SOUTH CAROLINA )

COUNTY OF CHARLESTON )

Tomeka Shayron Middleton, )

Plaintiff )

v. )

Frederick Fields, et al. )

Respondent. )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO.: 2021-CP-10-05234

**RESTRAINING ORDER**

This matter comes before me pursuant to Fields Defendant's for Motion Restraining Order and Motion to Refer to Master in Equity.

NOW, THEREFORE, upon motion of Bruce A. Berlinsky, Esquire, attorney for Defendants, Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pinckney, Abraham Fields, and Joseph Fields, and with the consent of J. Chris Lanning, Esquire, attorney for Plaintiff, Tomeka Shayron Middleton, it is hereby

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, and the Fields Defendants or their representatives or anyone acting on their behalf shall not build, act on any previously issued building permit or allow anyone to erect, construct, or undertake to do any work or construction of any kind on property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not rent, lease, sublease, or in any way give any third party the right to occupy or dwell on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not threaten or otherwise intimidate bodily harm or verbal abuse towards any of the Fields Defendants or their representatives or anyone acting on their behalf; and, it is further

ORDERED, that Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley, shall not threaten or otherwise intimidate bodily harm or verbal abuse towards Abraham Fields, who resides in the dwelling next door to Tomeka Shayron Middleton; and, it is further

ORDERED, that none of the Fields Defendants or their representatives or anyone acting on their behalf shall rent, lease, sublease, or in any way give any third party the right to occupy or dwell on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172, nor threaten or otherwise intimidate bodily harm or verbal abuse towards Tomeka Shayron Middleton, or her representatives or anyone acting on her behalf, including, but not limited to, William Staley. This does not prohibit the Fields from management and operation of the current Tenants occupying the said commercial building/spaces on said property. Likewise, Tomeka Shayron Middleton or her guests and invitees shall not threaten or otherwise intimidate bodily harm or verbal abuse to any of the Fields Defendants or their guests and invitees, on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that Tomeka Shayron Middleton nor her guests or invitees shall have access to, or use of the basketball court located on any property identified as TMS Nos.: 318-00-00-173, 318-00-00-005, 318-00-00-006, and 318-00-00-172; and, it is further

ORDERED, that both parties reserve any and all rights with regard to the subject property not addressed in this Order; and, it is further

ORDERED, that the above styled cause of action shall be referred to the Honorable Mikell R. Scarborough, Master in Equity for Charleston County, for the purpose of taking testimony and making findings of fact and conclusions of law, including any post trial motions or other matters and to render a final decree directly appealable to the Supreme Court of South Carolina; and, it is further

ORDERED, that this Order shall remain in full force and effect pending a hearing on the merits addressing all issues and/or matters before this Honorable Court or further Order of this Court.

AND IT IS SO ORDERED!

*\*Signatures on Following Page\**

Charleston, South Carolina  
October \_\_\_\_\_, 2022

\_\_\_\_\_  
Honorable Jennifer McCoy  
Charleston County Court of Common Pleas

WE CONSENT:

s/Bruce A. Berlinsky  
Bruce A. Berlinsky, Esq.  
One Carriage Ln., Bldg. F  
Charleston, SC 29407  
*Attorney for Defendants,  
Frederick Fields, Anna White,  
Robert Fields, Jr., Juanita Pinckney,  
Abraham Fields, and Joseph Fields*

s/J. Chris Lanning  
J. Chris Lanning, Esq.  
12-A Carriage Ln.  
Charleston, SC 29407  
*Attorney for Plaintiff,  
Tomeka Shayron Middleton*



Charleston Common Pleas

**Case Caption:** Tomeka Shayron Middleton VS Frederick Fields , defendant, et al  
**Case Number:** 2021CP1005234  
**Type:** Order/Other

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2022-10-26 10:45:20 page 4 of 4

ELECTRONICALLY FILED - 2022 Nov 18 11:13 AM - CHARLESTON - COMMON PLEAS - CASE#2021CP1005234  
ELECTRONICALLY FILED - 2022 Dec 07 10:04 AM - CHARLESTON - COMMON PLEAS - CASE#2021CP1005234

**RECEIVED**

**Nov 10 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

MIKELL R. SCARBOROUGH, MASTER IN EQUITY

---

Appellate Case No. 2025-001058

Tomeka Shayron Middleton, Appellant,

v.

Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pickney, Abraham Fields, Joseph Fields, Jerome Johnson, Robert Johnson, Mildred Johnson, Vanessa Johnson, Florence Singleton, Edward Givens, Delores Skipper, Phillip Johnson, Claudine Johnson, Kathleen Clement, Dean Clement, Corvetta Grant, Deedra Grant and JOHN DOE, adults, RICHARD ROE, infants, insane persons, incompetents and persons in the military service of the United States of America, being fictitious names designating as a class any unknown person or persons who may be an heir, distribute, devisee, legatee, widower, widow, assign, administrator, executor, creditor, successor, personal representative, issue or alienee of Robert Fields, Ella Walker, Jerome Johnson, Robert Johnson, Mildred Johnson, Oliver Clement and Florence Singleton all of whom are deceased, and any other or all other persons or legal entities, known and unknown, claiming any right, title, interest or estate in or lien upon the parcel of real estate described in the Lis Pendens and Complaint herein filed, Defendants,

of whom Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pickney, Abraham Fields, and Joseph Fields are the Respondents.

Appellate Case No. 2025-001058

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CERTIFICATION

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The undersigned certifies that this Return to Motion to Stay contains no matters which are irrelevant to the Motion to Stay.

Respectfully submitted,



BRUCE A. BERLINSKY, PA  
Bruce A. Berlinsky, Esquire  
One Carriage Lane, Bldg. F  
Charleston, SC 29407  
Telephone: (843) 852-2202  
Email: [bruce@berlinskylawfirm.com](mailto:bruce@berlinskylawfirm.com)  
*Attorney for Respondents*

Charleston, South Carolina  
November 10<sup>th</sup>, 2025

**RECEIVED**

**Nov 10 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

MIKELL R. SCARBOROUGH, MASTER IN EQUITY

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Appellate Case No. 2025-001058

Tomeka Shayron Middleton, Appellant,

v.

Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pickney, Abraham Fields, Joseph Fields, Jerome Johnson, Robert Johnson, Mildred Johnson, Vanessa Johnson, Florence Singleton, Edward Givens, Delores Skipper, Phillip Johnson, Claudine Johnson, Kathleen Clement, Dean Clement, Corvetta Grant, Deedra Grant and JOHN DOE, adults, RICHARD ROE, infants, insane persons, incompetents and persons in the military service of the United States of America, being fictitious names designating as a class any unknown person or persons who may be an heir, distribute, devisee, legatee, widower, widow, assign, administrator, executor, creditor, successor, personal representative, issue or alienee of Robert Fields, Ella Walker, Jerome Johnson, Robert Johnson, Mildred Johnson, Oliver Clement and Florence Singleton all of whom are deceased, and any other or all other persons or legal entities, known and unknown, claiming any right, title, interest or estate in or lien upon the parcel of real estate described in the Lis Pendens and Complaint herein filed, Defendants,

of whom Frederick Fields, Anna White, Robert Fields, Jr., Juanita Pickney, Abraham Fields, and Joseph Fields are the Respondents.

Appellate Case No. 2025-001058

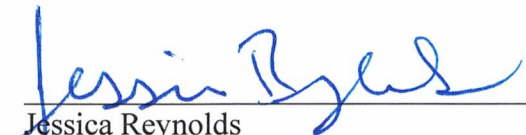
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PROOF OF SERVICE

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The undersigned hereby certifies that on this 10<sup>th</sup> day of November, 2025, she served the Appellant, pro se, with a copy of ***Return to Motion to Stay*** in this matter by sending via electronic mail and mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Tomeka Shayron Middleton  
3074 River Road  
Johns Island, SC 29455  
Email: [tmshayron@gmail.com](mailto:tmshayron@gmail.com)  
*Appellant*

  
\_\_\_\_\_  
Jessica Reynolds  
Paralegal to Bruce A. Berlinsky  
Bruce A. Berlinsky, P.A.