

Monier Abusaft
133 East Frederick Street
Gaffney, South Carolina 29340

December 10, 2025

Subject: Submission of Proof of Service and Payment Records for Motions and Notice of Appeal Fee

Re: Case No. **2025-002312** — Ortagus Bennett

Clerk of Court
South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

RECEIVED

DEC 16 2025

SC Court of Appeals

Dear Clerk:

Please find enclosed the **Proof of Service** for the following items previously submitted to the South Carolina Court of Appeals in connection with **Ortagus Bennett**, Case No. **2025-002312**:

1. One cashier's check in the amount of **\$250.00** from Synovus Bank; and
2. One Western Union money order in the amount of **\$150.00**, payable to the South Carolina Court of Appeals.
3. Letter of representation is also included.

These payments correspond to the **three motions** cited in the letter received from the Court of Appeals. The remaining funds from these payments were used to satisfy the **filing fee for the Notice of Appeal**. All money orders and the cashier's check were mailed to the Court of Appeals on **December 4, 2025**.

Also enclosed is the Proof of Service showing that these three motions were served on the Defendants.

Thank you for your attention to this matter. Please let me know if anything further is required.

Sincerely,
Mo Abusaft

Enclosures:

- Proof of Service (payments)
- Cashier's check (\$250)
- Western Union money order (\$150)
- Proof of Service (three motions)
- Copy of Court of Appeals letter
- Letter of Representation

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

RECEIVED

DEC 16 2025

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

George E. Brown, Circuit Court Judge

Case No. 2025-002312

Douglas Family Partnership, LLP, Respondent,

v.

First Class Barbers, LLC Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Douglas Family Partnership, LLP, by depositing a copy of it in the United States Mail, postage prepaid, on December 10, 2025, addressed to SC Court of Appeals by delivering a copy of it via USPS certified mail, at her 1220 Senate St., Columbia, SC 29201.

December 10, 2025

s/Monier Abusoft
Monier Abusoft
133 E. Frederick St.
Gaffney, SC 29340
864-208-9281
mo@moabusoft.com
Attorney for Appellant

LAW OFFICES OF MO ABUSAFT

Monier Abusoft

133 E. Frederick Street
Gaffney, SC 29340
T: (864) 606-8941
E: mo@moabusoft.com

December 10, 2025

Clerk of Court

South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

**RE: Notice of Representation – Ortagus Bennett
First Class Barbers, LLC v. Douglas Family Partnership, LLP**

To Whom It May Concern:

Please be advised that this firm has been retained to represent Mr. Ortagus Bennett in connection with the above-referenced civil matter. Kindly direct all future communications regarding this case to our office. Mr. Bennett should not be contacted directly concerning this litigation.

We respectfully request that you forward any relevant correspondence, discovery materials, or notices to the address above. Please ensure that Mr. Bennett's interests are preserved throughout this matter and that no action is taken without first consulting our office.

If you are represented by counsel, please have them contact us at their earliest convenience so we may coordinate as appropriate under the South Carolina Rules of Civil Procedure.

Thank you for your cooperation and prompt attention to this matter. Please send all correspondence to my Chief of Staff, Deede Burgess, at dsburgess@moabusoft.com.

Sincerely,

Mo Abusoft
Attorney for Ortagas Bennett

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

First Class Barbers, LLC,

Plaintiff,

vs.

Douglas Family Partnership, LLP,

Defendant.

IN THE COURT OF COMMON PLEAS

CASE NO: **2025-002312**

CERTIFICATE OF SERVICE

I, **Deede Burgess**, hereby certify that on **December 9, 2025**, I served the following documents related to the above-referenced case:

- Proof of Service for the cashier's check in the amount of **\$250.00** from Synovus Bank;
- Proof of Service for the Western Union money order in the amount of **\$150.00**, payable to the South Carolina Court of Appeals;
- Proof of Service of the **three motions** referenced in the Court of Appeals' correspondence; and
- Letter of Representation
- Documentation noting that the remaining funds were used to satisfy the **Notice of Appeal filing fee**, and that all payments were mailed to the South Carolina Court of Appeals on **December 4, 2025**.

These documents were served upon the **Defendants** in accordance with the applicable rules of service.

The documents were also mailed to:

Clerk of Court
South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

Max Hyde; Samantha Larkins; Troy Nance
Hyde Law Firm, P.A.
753 East Main Street, Suite One
Spartanburg, SC 29302

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DEC 16 2025

SC Court of Appeals

Executed this **11th day of December, 2025**, at Gaffney, South Carolina.

LAW OFFICE OF
MO ABUSAFT

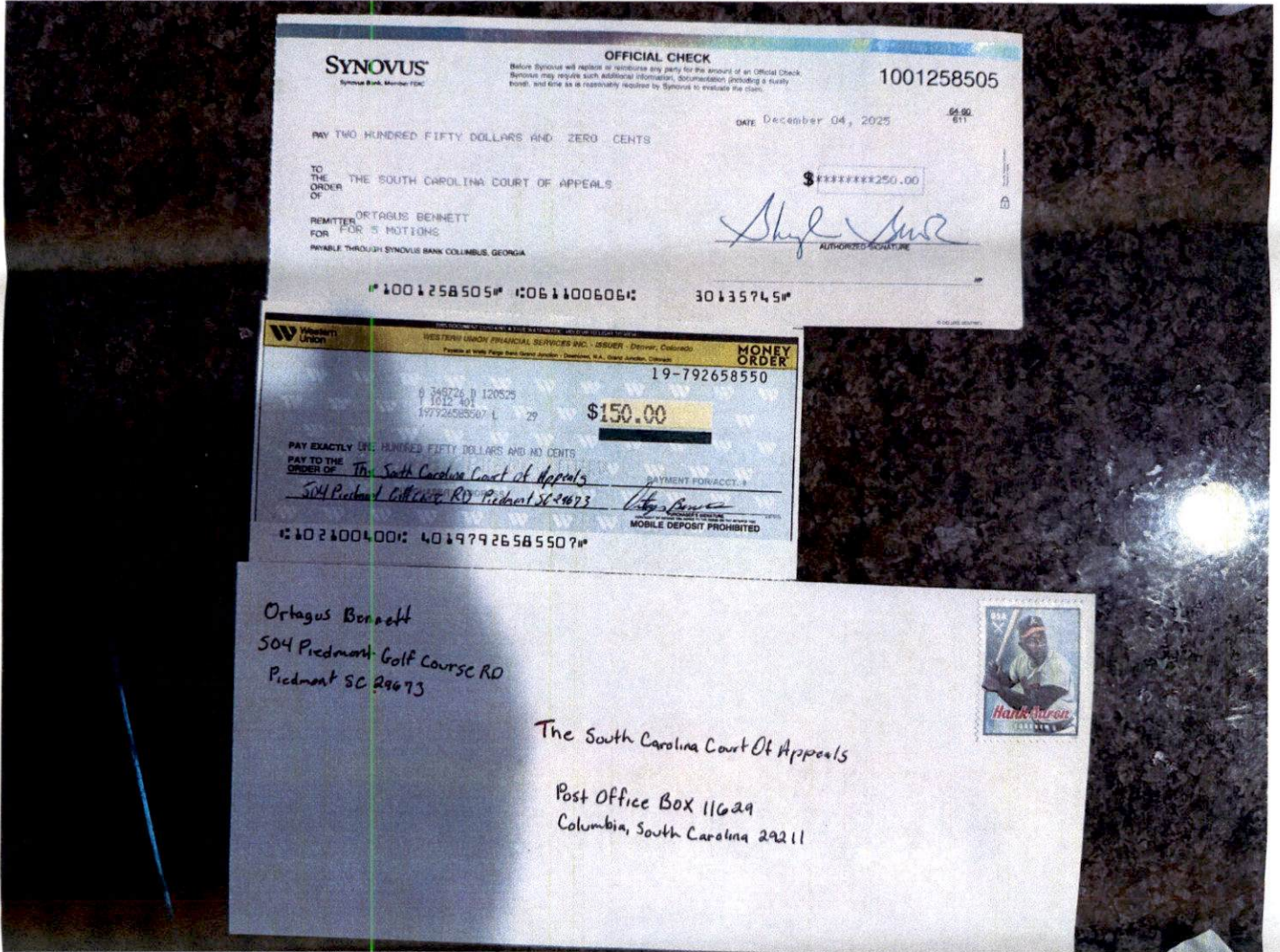
s/Deede S. Burgess
Deede S. Burgess
Law Office of Mo Abusoft
133 E. Frederick St.
Gaffney, SC 29340

Payment To The SC Court Of Appeal

1 message

Ortagus Bennett <tay.5star.ent@gmail.com>
To: Dsburgess@moabusaft.com

Tue, Dec 9, 2025 at 10:58 AM



IN THE SOUTH CAROLINA COURT OF APPEALS
First Class Barbers, LLC, Appellant
v.
Douglas Family Partnership, LLP, Respondent
Appellate Case No. 2025-002312

RECEIVED
Nov 26 2025
SC Court of Appeals

MOTION FOR APPOINTMENT OR REINSTATEMENT OF COUNSEL

Appellant requests reinstatement of former counsel or time to retain new counsel under Rule 1.16(c), SCRPC.

Respectfully submitted,



Ortagus Bennett
Managing Member, First Class Barbers, LLC
504 Piedmont Golf Course Road
Piedmont, SC 29673
Phone: (864) 232-3526
Email: FirstClassBarbers@gmail.com

CERTIFICATE OF SERVICE

I certify that I mailed a copy of this filing to all counsel of record.

Date: 11/26/25

IN THE SOUTH CAROLINA COURT OF APPEALS
First Class Barbers, LLC, Appellant
v.
Douglas Family Partnership, LLP, Respondent
Appellate Case No. 2025-002312

RECEIVED
Nov 26 2025
SC Court of Appeals

MOTION TO REINSTATE APPEAL

Because counsel's withdrawal prejudiced Appellant, reinstatement is warranted.

Case Law:

- Goodson v. Am. Bankers Ins. Co., 295 S.C. 400 (Ct. App. 1988)

Respectfully submitted



Ortagus Bennett
Managing Member, First Class Barbers, LLC
504 Piedmont Golf Course Road
Piedmont, SC 29673
Phone: (864) 232-3526
Email: FirstClassBarbers@gmail.com

CERTIFICATE OF SERVICE

I certify that I mailed a copy of this filing to all counsel of record.

Date: 11/26/25

IN THE SOUTH CAROLINA COURT OF APPEALS
First Class Barbers, LLC, Appellant
v.
Douglas Family Partnership, LLP, Respondent
Appellate Case No. 2025-002312

RECEIVED
Nov 26 2025
SC Court of Appeals

MOTION TO ADDRESS IMPROPER WITHDRAWAL OF COUNSEL AND REQUEST FOR RELIEF

Comes now Ortagus Bennett, managing member of First Class Barbers, LLC, and respectfully moves *this Court for relief* arising from the trial court's order permitting prior counsel to withdraw. In support thereof, Mr. Bennett states as follows:

1. Lack of Notice and Opportunity to Be Heard

The trial court permitted counsel for Appellant to withdraw without providing Mr. Bennett timely notice or an opportunity to be heard. As a result, Appellant was left without legal representation at a critical stage of litigation. This constitutes a deprivation of due process under the Fourteenth Amendment to the U.S. Constitution and Article I, § 3 of the South Carolina Constitution.

2. Counsel's Withdrawal Was Not Properly Safeguarded

Under Rule 1.16(c) of the South Carolina Rules of Professional Conduct, an attorney may not terminate representation without taking steps to ensure the client is not prejudiced. No protective measures were implemented to ensure the LLC could pursue its legal rights. The withdrawal directly created the deficiencies identified in the Clerk's November 18, 2025 notice.

3. Prejudice Resulting From Counsel Abandonment

South Carolina law prohibits LLCs from proceeding without legal counsel. See *Renaissance Enters. v. Summit Teleservices, Inc.*, 334 S.C. 649, 515 S.E.2d 257 (1999). The improper withdrawal effectively extinguished Appellant's ability to participate in judicial proceedings, preventing the prosecution of this appeal.

4. Request for Relief

Mr. Bennett respectfully requests:

- a. That the Court recognize the due-process violation caused by improper withdrawal of counsel;
- b. That the Court grant additional time for Appellant to retain qualified counsel;
- c. Alternatively, that the Court stay dismissal until counsel properly enters an appearance;
- d. That the deficiencies in the Clerk's letter be held in abeyance until representation issues are corrected.

Respectfully submitted,



Ortagus Bennett

Managing Member, First Class Barbers, LLC

504 Piedmont Golf Course Road

Piedmont, SC 29673

Phone: (864) 232-3526

Email: FirstClassBarbers@gmail.com

CERTIFICATE OF SERVICE

I certify that I have served a copy of this filing on all counsel of record by depositing it in the United States mail with proper postage affixed.

Date: 11/26/25

LAW OFFICE OF
MO ABUSAFT

Criminal and Injury Attorney

229 MAGNOLIA STREET
SPARTANBURG, SC 29306

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SC Court of Appeals

PLACE STICKER ON THE FRONT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



7021 1970 0001 5977 0167

Retail



29201

RDC 99

U.S. POSTAGE
FCM LETTER
GAFFNEY, SC
DEC 11, 2025

\$11.20

S2324E5013

Clerk of Court
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201

NON MACHINABLE