

CERTIFICATE OF SERVICE

I/ we hereby certify that the **Notice of Appeal** and **Designation of Matter to Be Included in the Record on Appeal** were filed in the **Greenville County Court of Common Pleas**, and pursuant to **Rule 262, SCACR**, and the *South Carolina Judicial Branch E-Filing Policies and Operating Procedures*, were **electronically served on all counsel of record**, including Respondent's counsel, through the lower court's E-Filing system at the time of filing.

Out of an abundance of caution, Appellants file this Certificate to clarify that service was properly effected under the mandatory E-Service rules applicable to all registered South Carolina Bar members.

Attached as **Exhibit A** and **Exhibit B** are the stamped copies of the filings as they appear in the lower court docket. If the need arises, Appellants can provide certified copies of the aforementioned documents as well.

Respectfully presented,

s/ **Austin J. Davis**, Appellant

s/ **Erica Lynn Davis**, Appellant

February 28, 2026

Simpsonville, South Carolina

RECEIVED

Mar 02 2026

SC Court of Appeals

Exhibit A

**IN THE COURT OF COMMON PLEAS
GREENVILLE COUNTY, SOUTH CAROLINA**

Robert Barnett, as Trustee of the RH 401(k) Plan,

Plaintiff (Respondent),

v.

Erica Lynn Davis, Austin J. Davis,
and Signature Gain Express Trust, DTE 06/22/2022
(An Irrevocable Express Trust Organization)
Harol Alezu Lozano Moran, Sole Trustee,

Defendant (Petitioner)

Case No: Case No. 2025-CP-23-03796

NOTICE OF APPEAL

(Rule 203(b)(1), South Carolina Appellate Court Rules)

TO: The Clerk of Court for Greenville County
and
Counsel for Plaintiff, Red Hills Holdings, LLC:


1. **PLEASE TAKE NOTICE** that the Defendant, Signature Gain Express Trust, by Trustee Erica L. Davis and Authorized Representative, Austin J. Davis, hereby give notice of appeal to the **South Carolina Court of Appeals** from the **Order and Judgment of Foreclosure and Sale** entered in this matter on **September 24, 2025**, in the Court of Common Pleas for Greenville County, Thirteenth Judicial Circuit, the Honorable Charles B. Simmons, Jr., presiding.

FILED
2025 SEP 24 10 58 AM
CLERK OF COURT
GREENVILLE COUNTY
SOUTH CAROLINA

2. This appeal is taken pursuant to **Rule 203(b)(1), South Carolina Appellate Court Rules (SCACR)**, and is timely filed within thirty (30) days after receipt of written notice of entry of the judgment appealed from.
3. The Defendant seeks appellate review of all rulings, orders, and judgments adverse to Defendant's protected rights, including but not limited to:
 - (a) **the denial** of the Motion to Compel Production of Original Instruments and Custodial Records;
 - (b) **the refusal to address** pending evidentiary and Rule 43 motions before entry of judgment;
 - (c) the Court's reliance upon **unauthenticated copies** of purported negotiable instruments; and
 - (d) the entry of judgment **without a full and fair hearing**, contrary to due process and South Carolina law.
4. Defendant further moves for an automatic **stay of enforcement** pending disposition of a separately filed **Emergency Motion for Stay Pending Appeal**, to prevent irreparable harm arising from any foreclosure sale before appellate review is completed.

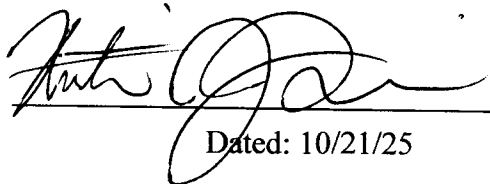
Respectfully Presented,

Erica L. Davis, Trustee
Signature Gain Express Trust
131 Roundtree Drive
Simpsonville, South Carolina, 29681



Dated: 10/21/2025

Austin J. Davis, Authorized Representative
Signature Gain Express Trust
131 Roundtree Drive
Simpsonville, South Carolina, 29681



Dated: 10/21/25

CERTIFICATE OF SERVICE

"I hereby certify that a true and correct copy of the foregoing was served on [Attorney Name], counsel for Plaintiff, by electronic service via the South Carolina Judicial Department's E-Filing System on this 21st day of October, 2025."

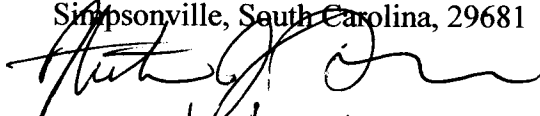
J. Kershaw Spong
Robinson Gray Stepp & Laffitte,
LLC P.O. Box 11449 Columbia, SC 29211

Via:

Electronic Service; Public Index; Electronic Notification Service

Respectfully Presented,

Austin J. Davis, Trustee
Signature Gain Express Trust
131 Roundtree Drive
Simpsonville, South Carolina, 29681


Date: 10/21/2025

**IN THE COURT OF APPEALS
GREENVILLE COUNTY, SOUTH CAROLINA**

'25 OCT 30 PM 1:38
JAY GRESHAM CDC GVL SC

Austin J. Davis, Erica L. Davis, Appellants,

v.

Robert Barnett as Trustee of the RH 401(k) Plan, Respondent.

Appeal from the Thirteenth Judicial Circuit, Greenville County

Case No.: 2025-CP-23-03796

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 210, South Carolina Appellate Court Rules, Appellant hereby designates the following materials to be included in the Record on Appeal:

Appellant designates **ALL pleadings, motions, memoranda, orders, rulings, exhibits, and transcripts** filed or entered in the lower court proceedings for inclusion in the record, to ensure a complete and comprehensive record for review by the Court of Appeals.

Appellant requests that the Clerk of the Circuit Court prepare, assemble, and certify the full record accordingly for transmittal to the Court of Appeals pursuant to Rule 210(d), SCACR.

Respectfully presented,

Date: October 30, 2025



Austin J Davis (Appellant Pro Se)
131 Roundtree Drive
Simpsonville, South Carolina, 29681



Erica L. Davis (Appellant Pro Se)
131 Roundtree Drive
Simpsonville, South Carolina, 29681

ENTERED COMPUTER

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this **Designation of Matter to Be Included in the Record on Appeal** was served on counsel for Respondent via electronic service through the South Carolina Judicial Department's E-Filing System on this 30th day of October, 2025.

Respectfully Presented,



Austin J. Davis,

131 Roundtree Drive

Simpsonville, South Carolina, 29681