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SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

The Honorable Maite Murphy
Circuit Court Judge

Appellate Case No. 2025-001651

Hill Family 2008 Trust and Yvonne Herold, Respondents,

v.

Teresa Hill, Appellant.

RESPONDENTS' RETURN TO APPELLANT'S PETITION FOR SUPERSEDEAS AND
EMERGENCY MOTION FOR STAY

Respondents are compelled to note at the outset several matters that bear directly on this Court's consideration of this Petition.

First, this Petition is a direct continuation of a pattern of misrepresentation and procedural maneuvering that has characterized every stage of this litigation. Appellant filed an identical request (a Petition for Writ of Mandamus and Emergency Motion for Stay) with the South Carolina Supreme Court on April 13, 2026. The Supreme Court denied all relief the following day, April 14, 2026. (Exhibit A). Rather than providing this Court with a fresh analysis, the instant Petition largely recycles the same arguments the Supreme Court rejected less than twenty-four hours ago. The arguments failed before the Supreme Court for the same reasons they fail here.

Second, the April 9, 2026 Order (the “April 9 Order”) issued by the Honorable Dale E. Van Slambrook does not schedule a forced removal date, does not authorize the seizure of Appellant’s files, and does not specify any method of removal. (Exhibit B). It authorizes law enforcement to assist in enforcing the Writ of Ejectment in the event Appellant fails to post the required bond or vacate the premises. That authorization is conditional upon non-payment of bond and Appellant’s failure to vacate. Appellant alone controls whether law enforcement is ever involved. If she removes herself from the premises, she will not interact with law enforcement whatsoever.

Third, the law here is settled and straightforward. Rule 241(b)(10), SCACR, expressly provides that ejectment orders are not stayed by the filing of a notice of appeal. S.C. Code Ann. § 27-37-130 imposes an affirmative statutory duty on an appellant in an ejectment case to post a bond as a condition of maintaining the appeal. The legislature’s directive is mandatory: the statute provides that failure to post bond “shall” result in dismissal. Appellant has known of this requirement since the Magistrate issued the Writ of Ejectment on March 7, 2025. She has not posted bond. She has not vacated. Every consequence she now characterizes as an emergency is the direct and foreseeable result of her deliberate choice to do neither. Appellant is a licensed attorney. She cannot claim ignorance of a statutory bond requirement that is plainly stated in the Code and that has been cited repeatedly in every proceeding at every level of this litigation. Her failure to comply is not an oversight. It is a choice.

Fourth, Appellant’s email correspondence to Ms. Kitchings, Clerk of this Court, submitted contemporaneously with this Petition, contains inflammatory allegations about the alleged conduct of Charleston County Sheriff’s Deputies. Those allegations, beyond being misrepresentations, not before referenced in any pleading related to this matter, have no bearing

on the April 9 Order and no bearing on the supersedeas standard. Respondents are not aware of any police report, complaint, civil action, or disciplinary proceeding arising from the events Appellant describes. The invocation of those allegations in a submission to the clerk of court, timed to accompany an emergency filing, reflects the same calculated effort to alarm this Court that characterized Appellant's communications to the Supreme Court Clerk on April 13, 2026, and which the Supreme Court rejected.

Fifth, Appellant's narrative has notably shifted in one regard. In her mandamus petition to the Supreme Court, the focus was on the urgency of imminent physical removal before she could be heard. In this Petition and in her email to Ms. Kitchings, the narrative has evolved to focus on alleged physical violence by law enforcement and her fear of interacting with any member of its agency. The Court should note this shift. Appellant does not need to interact with law enforcement at all. The April 9 Order is conditional on her failure to post bond or vacate the premises. She controls that condition entirely. The solution to her stated fear is to exercise the option she has had available since March 7, 2025: remove herself from the property or post the requisite bond pending the appeal.

Finally, with respect to Appellant's alleged concern about client files: Appellant has had more than thirteen months since the Magistrate issued the Writ of Ejectment on March 7, 2025, subsequently affirmed by the Circuit Court, and subsequently appealed to this Court, to make arrangements for the safe and orderly transition of her files to another location. If her files and personal belongings are at any risk, that risk is the product of her deliberate choice to remain on Respondents' property without posting bond, vacating the premises, or making any arrangement to do so during the extensive pendency of these proceedings. Any disruption that follows is entirely of her own making.

PROCEDURAL BACKGROUND

The Charleston County Magistrate Court issued a Writ of Ejectment on March 7, 2025 (Case No. 2025-CV-10-11200030), ordering Appellant to vacate Respondents' property at 6209 Savannah Highway, Ravenel, South Carolina. (Exhibit C). On March 13, 2025, Appellant appealed to the Circuit Court but did not post an appeal bond within five days of the ejectment order, as expressly required by S.C. Code Ann. § 27-37-130 to maintain an appeal. (Exhibit D).

On July 16, 2025, the Honorable Maite Murphy affirmed the Magistrate's Ejectment Order, finding "no error of law or of fact." (Exhibit E). The Circuit Court denied Appellant's Motion to Reconsider on August 7, 2025. Appellant appealed to this Court on August 14, 2025.

On September 19, 2025, Respondents moved to dismiss the appeal, enforce the ejectment order, and require Appellant to post a bond of \$720,000. This Court denied that motion on November 19, 2025, stating that "consideration of a bond—or the lack of a bond—is a motion more properly made to the circuit court." (Exhibit F).

Pursuant to this Court's Order, Respondents filed a Motion to Require Appellant to Post a Bond and/or Enforce Ejectment in the Circuit Court on January 29, 2026. (Exhibit G). The Honorable Dale E. Van Slambrook conducted a hearing on March 23, 2026. Appellant appeared *pro se*. Respondents presented evidence of the reasonable rental value of the Property. Appellant presented no contrary evidence. Appellant had also refused, in writing, to permit Respondents to inspect the Property, advising Respondents' counsel that "[n]either you nor your clients will set foot in my building, my business, or my home." (Exhibit G at p. 072; Exhibit B, Order, ¶¶ 18-20).

On April 9, 2026, Judge Van Slambrook issued the April 9 Order, finding the reasonable rental value to be \$7,363.18 per month, determining that the appellate process would likely take

three years, and requiring Appellant to post a bond of \$265,074.48 within five days, with enforcement to follow upon non-payment. (Exhibit B). Appellant has not posted the bond.

Appellant filed a Petition for Writ of Mandamus and Emergency Motion for Stay with the South Carolina Supreme Court on April 13, 2026. Respondents filed a Return the following day pursuant to the Supreme Court's instructions. The Supreme Court denied all relief on April 14, 2026. (Exhibit A). Appellant filed the instant Petition with this Court the same day.

I. THIS PETITION FAILS TO SATISFY RULE 241(D) AND IS MORE PROPERLY BEFORE THE CIRCUIT COURT.

Appellant's Petition is procedurally deficient on its face and should be dismissed on that basis before this Court reaches the merits.

Rule 241(d)(1), SCACR, is unambiguous: "Except where extraordinary circumstances make it impracticable, an application for supersedeas must first be made to the lower court or administrative tribunal that entered the order on appeal." Here, that tribunal is the Honorable Dale E. Van Slambrook, who issued the April 9 Order following a full evidentiary hearing. Appellant was required to apply to Judge Van Slambrook for supersedeas relief before petitioning this Court. She did not do so.

Rule 241(d)(4)(C) requires that a petition to this Court demonstrate either that an application for supersedeas was made to the lower court and was unjustifiably denied, or that extraordinary circumstances made it impracticable to make such an application. Appellant's Petition makes no such showing. She does not represent that she applied to Judge Van Slambrook for supersedeas and was denied. She does not identify any extraordinary circumstance excusing her failure to do so. The Petition is therefore deficient under Rule 241(d)(4)(C) on its face.

The circuit court is also the appropriate forum on practical grounds. Judge Van Slambrook conducted the evidentiary hearing, made the factual findings underlying the April 9 Order, and is intimately familiar with the record and Appellant's conduct throughout these proceedings. Additionally, a Motion for Reconsideration of the April 9 Order, filed by Appellant, is currently pending before him. If he grants reconsideration, this Court's intervention is unnecessary. If he denies it and also denies a supersedeas application, that ruling would inform any subsequent petition to this Court under Rule 241(d)(2). Either way, the circuit court is where this matter belongs at this stage.

Respondents respectfully submit that this Court should dismiss the Petition for failure to comply with Rule 241(d) and direct Appellant to first seek supersedeas relief from Judge Van Slambrook. Alternatively, in the event this Court elects to reach the merits, Appellant fails every factor of the applicable standard, as set forth below.

II. APPELLANT DOES NOT SATISFY THE STANDARD FOR A WRIT OF SUPERSEDEAS.

Rule 241(d), SCACR, authorizes this Court to issue a writ of supersedeas staying enforcement of an order while an appeal is pending. South Carolina courts evaluate four factors: (1) the petitioner's likelihood of success on the merits; (2) whether the petitioner will suffer irreparable harm without a stay; (3) whether the balance of hardships favors the petitioner; and (4) whether the public interest favors issuance of the writ. Appellant satisfies none of these factors.

A. Appellant Has No Likelihood of Success on the Merits.

Every argument Appellant raises in this Petition has been litigated and rejected at every level of these proceedings. The Ravenel Magistrate issued the Writ of Ejectment. The Circuit

Court affirmed, finding no error of law or fact. The South Carolina Supreme Court declined to vacate the April 9 Order or issue a Writ of Mandamus.

Appellant's reliance on *Rivers v. Smith*, 919 S.E.2d 545 (2025), continues to be misplaced. As Respondents demonstrated before the Supreme Court, *Rivers* holds precisely the opposite of what Appellant claims. The Supreme Court expressly held that a tenant who claims the purported landlord does not hold title, or who asserts superior title in herself, does not deprive the magistrate of authority to proceed with an eviction action. *Id.* at 550. "[T]he magistrates court is not deprived of the authority to conduct an eviction proceeding simply because the tenant claims the purported landlord does not hold title to the property." *Id.* at 551. Here, the Ravenel Magistrate issued the Writ of Ejectment, necessarily finding that the ejectment proceeding was properly before the court, and the Circuit Court affirmed that determination finding no error of law or fact.

Rivers further forecloses Appellant's argument that § 27-37-130 is inapplicable because she never signed a lease and never paid rent. The Supreme Court expressly held that a landlord-tenant relationship can exist without a written lease and without rent payment, and that an oral agreement allowing someone to occupy property is sufficient to create a tenancy. *Id.* at 551-52. Appellant's claim that the statutory bond requirement does not apply to her is therefore foreclosed by the very authority she cites.

Appellant's "horizontal review" argument, that Judge Van Slambrook improperly reviewed Judge Murphy's ruling, is also contradicted by the record and by this Court's own November 19, 2025 Order. Judge Murphy's July 16, 2025 Order affirmed the Magistrate's ejectment ruling on the merits. It said nothing about bond. This Court, in its November 19, 2025 Order, recognized that the bond issue, which is a statutory requirement, had not been resolved in

any prior order and directed it to the circuit court as “more properly made” there. Had Judge Murphy denied a bond in any operative order, this Court would have had no occasion to send the bond question back to the circuit court in the first place. A motion for bond heard for the first time pursuant to this Court’s referral is not a review of any prior order. There is no “horizontal review.” There is only a new motion before a competent tribunal, exactly as this Court directed.

Appellant’s argument that the April 9 Order exceeded the scope of this Court’s November 19, 2025 remand is equally without merit. This Court referred the bond question to the circuit court because S.C. Code Ann. § 27-40-800(f)(1) requires the circuit court to determine the rental amount before a stay can issue at the appellate level. Notably, Rule 241(b)(10), SCACR, lists both § 27-37-130 and § 27-40-800 side by side as the two statutory bases for the ejectment exception to the automatic stay on appeal, confirming that the legislature built a bond and undertaking requirement as a condition of staying an ejectment order at every appellate level.

This reading is further reinforced by S.C. Code Ann. § 18-9-170, which provides that where a judgment directs the sale or delivery of possession of real property, execution of that judgment shall not be stayed unless a written undertaking is executed. The Supreme Court recognized in *Horn v. Blackwell*, 212 S.C. 480, 48 S.E.2d 322 (1948), that the General Assembly may lawfully require the posting of a bond as a condition precedent to the right to appeal from an ejectment order. That is precisely what § 27-37-130 does and precisely what Judge Van Slambrook enforced. The enforcement provision in the April 9 Order is not an overreach. It is the consequence that § 27-37-130 and § 27-40-800(f)(1) together mandate. The circuit court gave effect to precisely what this Court identified as the proper subject of circuit court consideration.

Appellant's constitutional challenge to the bond amount is undermined by her own conduct. She refused to permit Respondents to inspect the Property for purposes of valuation, leaving only the evidence that was available. (Exhibit G at p. 072; Exhibit B, Order, ¶¶ 18-20).

A party who manufactures an evidentiary deficiency through obstruction cannot invoke it as grounds for extraordinary relief. Moreover, Appellant stated on the record at the March 23, 2026 hearing that she cannot pay the bond. The constitutional protection against excessive bonds prohibits bonds set in bad faith to deny appellate access; it does not guarantee a bond any particular appellant can afford. The \$265,074.48 figure represents three years of reasonable rental value on the property Respondents have been denied since March 2025. It is compensatory, not punitive.

Appellant argues that enforcement of the April 9 Order will moot her pending appeal. This is incorrect. Enforcement of a non-stayed ejectment order does not moot appellate review of whether the underlying ejectment was proper. Rule 241(b)(10), SCACR, expressly provides that ejectment orders are not stayed by the filing of a notice of appeal. The legislature determined that ejectment enforcement and appellate review are not mutually exclusive. Appellant's mootness argument would read the Rule 241(b)(10) exception out of the rules entirely.

Appellant's ownership claim is further refuted by the public record, of which this Court may take judicial notice. A search of the Charleston County Register of Deeds confirms that the property at 6209 Savannah Highway has never been titled in Appellant's name. (Exhibit H). Prior to the Quit-Claim Deed recorded in 2023 conveying title to the Hill Family 2008 Trust, title was held in the name of W. McAlister Hill and his wife. Even if Appellant were to successfully challenge the validity of the Trust's Quit-Claim Deed, title would revert to the prior owners or

their estates, not to Appellant. Her ownership claim has no foundation in the public record at any point in the chain of title.

The public record is not the only evidence against Appellant's ownership claim. During divorce proceedings in 2023, Appellant was required by law to disclose all assets, including any ownership interest in real property, in a financial declaration filed with the family court. Appellant did not list the property at 6209 Savannah Highway as an asset in those proceedings. (Exhibit I). A party who genuinely believed she owned a property for thirty-five years would not omit it from a court-ordered financial disclosure. That omission is a powerful admission against her present claim of ownership and directly undermines her likelihood of success on the merits.

B. The "Harm" Appellant Faces Is the Lawful Consequence of Her Own Choices.

Appellant characterizes removal from the Property as irreparable harm. It does not qualify as irreparable harm under any cognizable legal standard. Removal is the legally authorized consequence of a valid Writ of Ejectment that has been affirmed by multiple courts over more than a year of litigation. Appellant has had over thirteen months since the Magistrate issued the Writ to post bond, vacate the premises, or make orderly arrangements for both. She has done none of these things. It is noteworthy that the only party facing irreparable harm is Respondents. Appellant has admitted on the record that she cannot pay the bond. Granting the relief requested would adversely and permanently harm the lawful owners of the property, who have been denied its use, possession, and rental income since March 2025, with no prospect of compensation if a stay is granted.

Appellant's invocation of client files does not change the analysis. The April 9 Order does not authorize the seizure of her files. It authorizes law enforcement to assist in enforcing the Writ of Ejectment. Appellant has had the option to post the required bond, vacate the premises

voluntarily, or relocate her belongings. She has done none of these things. What happens to her files and belongings is entirely within her own control, as it has been since March 7, 2025.

Appellant's expressed fear of law enforcement is also not a cognizable basis for supersedeas. Respondents are not aware of any police report, civil complaint, or police disciplinary proceeding arising from the events that Appellant has alleged. More fundamentally, Appellant need not interact with law enforcement at all. If she removes herself from the property and relocates her belongings voluntarily, no law enforcement involvement is necessary or authorized. The April 9 Order conditions enforcement on Appellant's failure to act. The choice remains hers.

C. The Balance of Hardships Favors Respondents.

Respondents have been denied the use, possession, and rental income from their own property since March 2025. A stay would extend that deprivation indefinitely while the appeal runs its course. The hardship to Respondents from continued occupation of their property without bond or compensation is ongoing, substantial, and real. The hardship to Appellant from enforcement of a lawful ejectment order that she has had every opportunity to address through available means, including posting bond, vacating voluntarily, or seeking supersedeas at an earlier stage, is the product of her own litigation strategy, not an inequity that this Court should remedy.

D. The Public Interest Disfavors a Stay.

Rule 241(b)(10), SCACR, embodies the legislature's determination that ejectment orders are not automatically stayed on appeal and that enforcement and appellate review are not mutually exclusive. Granting supersedeas without bond on these facts, where Appellant has stated she cannot pay any meaningful bond, occupied Respondents' property for over a year in

defiance of valid ejectment orders, and declined every available procedural mechanism to address the bond requirement, would nullify the ejectment exception to the automatic stay rule. It would effectively create an unlimited right of occupancy for any ejectment appellant who claims inability to pay.

III. APPELLANT'S REQUEST FOR BOND-FREE SUPERSEDEAS SHOULD BE DENIED.

Appellant asks this Court to issue a writ of supersedeas without requiring any bond or, in the alternative, to fix security at a nominal amount. The request is without legal basis. The bond requirement in the ejectment context exists precisely to protect the property owner from the harm of continued unlawful occupation during the pendency of an appeal. Appellant stated on the record that she cannot pay any meaningful bond. That admission does not entitle her to bond-free occupancy. It reflects the position of a party who has occupied another person's property for over a year without compensation and without satisfying the statutory prerequisite to maintain an appeal.

CONCLUSION

Appellant has occupied Respondents' property at 6209 Savannah Highway, Ravenel, South Carolina for over a year in defiance of valid ejectment orders issued by the Ravenel Magistrate and affirmed by the Circuit Court. She has not posted bond. She has not vacated. She has filed successive motions and collateral proceedings at every court level, generating delay while Respondents are denied the use, possession, and rental income from their own property. This Petition is the latest iteration of that strategy, presenting to this Court within twenty-four hours of the Supreme Court's denial of identical relief the same arguments that have been raised and rejected at every stage of these proceedings.

The urgency Appellant describes is entirely of her own making. She has had more than thirteen months to post bond, vacate the premises, and relocate her belongings. If she removes herself from the property voluntarily, there is no removal, no interaction with law enforcement, and no disruption to her practice. The choice has always been hers.

For the foregoing reasons, Respondents respectfully request that this Court deny the Petition for Supersedeas, deny the Emergency Motion for Stay, and allow the April 9 Order to take effect according to its terms.

Respectfully submitted,

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**Attorney for Respondents Hill Family 2008 Trust and
Yvonne Herold, Trustee**

April 15, 2026
Mount Pleasant, South Carolina

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

The Honorable Maite Murphy
Circuit Court Judge

Appellate Case No. 2025-001651

Hill Family 2008 Trust and Yvonne Herold, Respondents,

v.

Teresa Hill, Appellant.

EXHIBITS TO RESPONDENTS’ RETURN
TO APPELLANT’S PETITION FOR SUPERSEDEAS
AND EMERGENCY MOTION FOR STAY

Exhibit A — Supreme Court Order denying Petition for Writ of Mandamus and Emergency Motion for Stay (April 14, 2026).....001

Exhibit B — April 9, 2026 Order of the Honorable Dale E. Van Slambrook Granting Respondents’ Motion to Require Bond and/or Enforce Ejectment.....003

Exhibit C — Writ of Ejectment, Ravenel Magistrate Court (March 7, 2025).....010

Exhibit D — Notice of Appeal to Circuit Court (March 13, 2025).....017

Exhibit E — Circuit Court Order affirming Magistrate’s Ejectment Order (July 16, 2025).....025

Exhibit F — Court of Appeals Order denying Respondents’ Motion to Dismiss and referring bond question to circuit court (November 19, 2025).....028

Exhibit G — Respondents’ Motion to Require Appellant to Post Bond and/or Enforce Ejectment filed in Circuit Court (January 29, 2026), including Appellant’s written refusal to permit inspection of the Property.....030

Exhibit H — Charleston County Register of Deeds records confirming chain of title for 6209 Savannah Highway.....073

Exhibit I — Appellant’s financial declaration filed in family court divorce proceedings (2023).....080

Respectfully submitted,

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s/Jesse Sanchez

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Attorney for Respondents Hill Family 2008 Trust and Yvonne Herold, Trustee

April 15, 2026
Mount Pleasant, South Carolina

Exhibit A

The Supreme Court of South Carolina

Teresa Hill, Petitioner,

v.

The Honorable Dale E. Van Slambrook, The Honorable
Maite Murphy, and The Honorable Sheryl M. Perry,
Respondents,

and

Hill Family 2008 Trust of Arizona and Yvonne E.
Herold, Trustee, Real Parties in Interest.

Appellate Case No. 2026-000894

ORDER

Petitioner has filed a petition for a writ of mandamus, emergency motion for stay pending disposition, and motion for referral to the Court of Common Pleas in our original jurisdiction. She asks this Court to stay the order of ejectment issued by the Honorable Dale E. Van Slambrook, which requires Petitioner to post a bond pending appeal; prohibit law enforcement from executing the writ of ejectment; require Judge Van Slambrook to vacate his order of ejectment; direct the Charleston County Court of Common Pleas to rule on Petitioner's motion to compel production of an alleged trust instrument; require the Charleston County Court of Common Pleas and the Magistrate to require the Hill Family 2008 Trust of Arizona and Yvonne Herold, Trustee, to produce the alleged trust instrument prior to any further prosecution of the ejectment action; and, alternatively, reduce the bond to a nominal amount and allow Petitioner a reasonable amount of time to remove her possessions from the premises. The Real Parties in Interest have filed a return opposing the requests.

Any request to stay enforcement of the ejectment order should be made by a petition for supersedeas to the circuit court and/or the court of appeals, where an

appeal of the order is currently pending in Appellate Case No. 2025-001651. *See* Rule 241(d), SCACR (setting forth the procedure for obtaining supersedeas); *State v. Hill*, 314 S.C. 330, 332, 444 S.E.2d 255, 256 (1994) (stating a writ of supersedeas is only available where there is an appealable order). Petitioner has not shown that she is entitled to a writ of mandamus or referral to the Court of Common Pleas for any of the actions she requests. *See Wilson v. Preston*, 378 S.C. 348, 354, 662 S.E.2d 580, 583 (2008) (providing that to obtain a writ of mandamus requiring the performance of an act, the petitioner must show: (1) a duty of the respondent to perform the act; (2) the ministerial nature of the act; (3) the petitioner's specific legal right for which discharge of the duty is necessary; and (4) the lack of any other legal remedy). Because Petitioner has not shown good reason for this Court to determine these requests in our original jurisdiction, we decline to entertain the petition for a writ of mandamus, emergency motion for stay, and motion for referral to the Court of Common Pleas. *See* Rule 245, SCACR (providing this Court will not entertain matters in its original jurisdiction when the matter can be determined in a lower court without material prejudice to the rights of the parties).


FOR THE COURT C.J.

Columbia, South Carolina
April 14, 2026

cc:
Teresa Zachry Hill
Daniel S. Slotchiver
Anna E. Richter
Jesse Sanchez
The Honorable Dale E. Van Slambrook
The Honorable Maite Murphy
The Honorable Sheryl M. Perry
The Honorable Jenny Abbott Kitchings

Exhibit B

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON)	CASE NO.: 2025-CP-10-01379
)	
HILL FAMILY 2008 TRUST,)	
YVONNE H. HEROLD, TRUSTEE,)	
Respondent/Plaintiff,)	
)	ORDER GRANTING RESPONDENTS'
vs.)	MOTION TO REQUIRE BOND
)	AND/OR ENFORCE EJECTMENT
TERESA K. ZACHRY, fka, TERESA Z. HILL,)	
Appellant/Defendant.)	

THIS MATTER comes before the Court for a hearing on March 23, 2026, upon the Respondents’, the Hill Family 2008 Trust, Yvonne H. Herold, Trustee, (hereinafter “Respondents”) Motion to Require Appellant to Post a Bond and/or Enforce Ejectment. Present at the hearing were the following: Anna E. Richter, Esq., and Daniel S. Slotchiver, Esq., counsel for the Respondents; the Respondents, the Hill Family 2008 Trust, Yvonne H. Herold, Trustee; and Appellant Teresa K. Zachry, fka Teresa Z. Hill, Esq., *Pro se*, (hereinafter “Appellant”).¹

After reviewing the pleadings, exhibits, the record, and applicable law, and considering arguments of counsel and the parties, the Court makes the following findings of fact and conclusions of law:

1. Pursuant to a Quit-Claim Deed recorded with the Charleston County Register of Deed’s office, the property located at 6209 Savannah Highway, Ravenel, South Carolina, in Charleston County (hereinafter “the Property”), is owned by the Respondents, the Hill Family 2008 Trust.

¹ All findings of fact and conclusions of law indicated in this Order are made for the purpose of ruling on this motion only.

2. On March 7, 2025, the Charleston County Magistrate Court issued a Writ of Ejectment ordering Appellant to vacate the property located at 6209 Savannah Highway, Ravenel, South Carolina, in Charleston County.
3. On March 13, 2025, Appellant filed a Notice of Appeal from the Magistrate Court's Ejectment Order.
4. Appellant failed to post an appeal bond within five (5) days of service of the Notice of Appeal, as required by S.C. Code Ann. § 27-37-130.
5. On July 16, 2025, the Circuit Court affirmed the Magistrate Court's Ejectment Order, finding "no error of law nor of fact."
6. The Circuit Court further denied Appellant's Motion to Reconsider on August 7, 2025.
7. Thereafter, on August 8, 2025, Appellant filed an appeal to the Court of Appeals and continues to wrongfully occupy the Property owned by Respondents.
8. On September 19, 2025, Respondents moved to dismiss the appeal and enforce the Ejectment Order in the Court of Appeals, contending that Appellant failed to post the statutorily-required bond to maintain an appeal. Appellant did not file a return to Respondents' Motion.
9. On November 19, 2025, the Court of Appeals issued an Order denying Respondents' motion to dismiss the appeal and enforce ejectment. However, regarding Respondents' request for Appellant to post a bond, the Court of Appeals held that "...consideration of a bond—or the lack of a bond—is a motion more properly made to the circuit court." The appeal remains pending before the Court of Appeals.

10. On January 29, 2026, pursuant to the Court of Appeals' Order, Respondents filed a Motion to Require Appellant to Post a Bond and/or Enforce Ejectment in the Circuit Court, and a hearing was held on March 23, 2026.
11. This Court has jurisdiction over the parties and the subject matter of this action, in light of the Court of Appeals' Order dated November 19, 2025.
12. Appellant has refused to vacate the property despite the Ejectment Order and has continued to occupy the premises without payment of rent or security.
13. Respondents have been deprived of the use, possession, and full rental value of the Property since March of 2025.
14. S.C. Code § 27-37-130 expressly mandates that an appeal bond must be posted to maintain an ejectment appeal. The statute provides that an appeal will not stay ejectment without a bond and that failure to file the required bond within five (5) days requires dismissal of the appeal ("such appeal *shall* be dismissed.").
15. The Court finds that Appellant has failed to post any bond whatsoever. Appellant did not post a bond at the time of the initial appeal to Circuit Court, she did not post one during the Circuit Court proceedings, and she has not posted one upon appeal to the Court of Appeals.
16. "The cardinal rule of statutory construction is to ascertain and effectuate the intent of the legislature. Under the plain meaning, it is not the court's place to change the meaning of a clear and unambiguous statute. Where the statute's language is plain and unambiguous, and conveys a clear and definite meaning, the rules of statutory interpretation are not needed and the court has no right to impose another meaning. What a legislature says in the text of a statute is considered the best evidence of the legislative intent or will.

Therefore, the courts are bound to give effect to the expressed intent of the legislature.”
Hodges v. Rainey, 341 S.C. 79, 85, 533 S.E.2d 578 (2000) (internal citations omitted).

17. The Court finds that the legislature’s intent is clear: without a bond, there is no stay, and the appeal **shall** be dismissed if the appellant does not post a bond within five (5) days after service of the notice of appeal.
18. On December 15, 2025, Counsel for Respondents wrote to Appellant requesting the parties coordinate a mutually agreeable date for Respondents to inspect the property so that the proper amount of rent could be determined and used for bond calculation.
19. On December 30, 2025, Appellant wrote an email response to Respondents’ counsel wherein Appellant refused to allow Respondents of their attorneys to inspect the building, and further advised “**[n]either you nor your clients will set foot in my building, my business, or my home.**”[sic].
20. The Court finds that due to Appellant’s conduct, Respondents, nor anyone on their behalf, were able to inspect the Property.
21. The Court finds that the reasonable rental value of the Property is \$7,363.18 per month as calculated and determined by the Respondent. The Appellant offered no evidence contrary to the rental value ascertained by Respondent. Further, that the Appellate process will likely take three (3) years, and that Respondents have suffered and will continue to suffer damages as a result of Appellant’s continued occupancy.
22. The Court finds, pursuant to S.C. Code § 27-37-130, that Appellant must post a bond in order to maintain her appeal. The statute further provides that failure to timely post the required bond mandates dismissal of the appeal.

23. While the general rule provides that “the service of a notice of appeal in a civil matter acts to automatically stay matters decided in the order,” Rule 241(b)(10) expressly excepts: “Ejectment orders as provided in S.C. Code Ann. § 27-37-130 and S.C. Code Ann. § 27-40-800.”
24. This is an ejectment action pursuant to S.C. Code § 27-37-130. Accordingly, the Court finds, pursuant to Rule 241(b)(10), South Carolina Appellate Court Rules, that ejectment orders are expressly excluded from the automatic stay provision applicable to civil appeal, thus there is no automatic stay.
25. Accordingly, the filing on an appeal does not stay enforcement of an ejectment order absent compliance with the statutory bond requirement.
26. Appellant’s failure to post the required bond deprives her of any entitlement to a stay of ejectment.
27. The Court finds that Appellant, who is a lawyer and has chosen to represent herself *Pro se*, has refused to vacate the Property for over a year, causing great harm to Respondents. The continued possession of the Property by Appellant without posting a bond or vacating the premises is contrary to South Carolina law and results in ongoing prejudice to the Respondents.
28. The Court finds that a bond in the amount of \$265,074.48 is reasonable and necessary to protect the Respondents’ interest during the pendency of the appeal, which is likely to last three (3) years.

THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED, as follows:

IT IS ORDERED that pursuant to S.C. Code Ann. § 27-37-130, Appellant shall post a bond with the Clerk of Court in the amount of two hundred sixty-five thousand seventy-four dollars and forty-eight cents (\$265,074.48) within five (5) days from the date of this Order;

IT IS FURTHER ORDERED that in the event Appellant posts the required bond, Appellant shall maintain said bond in full force and effect for the entirety of the appellate proceedings and shall file proof thereof with the Clerk of Court. Failure to maintain the required bond during the pendency of the appeal shall subject the appeal to dismissal pursuant to S.C. Code Ann. § 27-37-130;

IT IS FURTHER ORDERED that in the event that Appellant fails to post the required bond within five (5) days from the date of this Order, the Appeal shall be subject to dismissal pursuant to S.C. Code Ann. § 27-37-130;

IT IS FURTHER ORDERED that if Appellant fails to post the required bond within five (5) days from the date of this Order, the Writ of Ejectment issued by the Magistrate Court on March 7, 2025, shall be immediately enforced, including authorization for law enforcement to assist in effectuating the removal of Appellant from the Property and compliance with the Writ of Ejectment and this Order.

AND IT IS SO ORDERED!

Hon. Dale E. Van Slambrook
Circuit Court Judge
Ninth Judicial Circuit

Date: _____
Moncks Corner, South Carolina



Charleston Common Pleas

Case Caption: Teresa Zachry Hill VS Hill Family Trust 2008 of Arizona

Case Number: 2025CP1001379

Type: Order/Other

And It Is So Ordered!

s/Dale E. Van Slambrook S.C. Circuit Court Judge
#2781

Electronically signed on 2026-04-09 11:41:02 page 7 of 7

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
)
)
)

2025CV1011200030
CIVIL CASE NUMBER



IN THE MAGISTRATE'S COURT

WRIT OF EJECTMENT

Hill Family 2008 Trust
6010 Martin Street
Ravenel, SC 29470
(843) 693-7594

PLAINTIFF(S)

Vs
Teresa K Zachry
6209 Savannah Hwy Suite A
Ravenel, SC 29470

DEFENDANT(S)

TO THE SHERIFF/MAGISTRATE'S CONSTABLE:

Upon Judgment of this Court, rendered on the 7th day of March, 2025, you are hereby Ordered to proceed to the premises located at **6209 Savannah Hwy Suite A Ravenel, SC 29470.**

Announce your identity and purpose and serve on the defendant(s) and all occupants a copy of this Writ of Ejectment. Inform them they have **twenty four (24) hours to voluntarily vacate** the premises. **If the premises appear unoccupied and no one responds** to your announced identity and purpose, the Writ of Ejectment shall be served by securely attaching a copy of the Writ in a conspicuous place on the premises.

If after 24 hours following the service or posting of the Writ, the occupants have not voluntarily vacated the premises, **a deputy sheriff may enter the premises** using only as much force as is necessary to effectuate the Ejectment.

Upon gaining access, you shall **remove from the premises any occupants and all items of personal property found on the premises. Such property may be deposited beside the public street or roadway.** All personal property removed from the premises and placed on a public street or roadway may be removed by the proper local government agency after forty eight (48) hours, excluding Saturdays, Sundays, and holidays. Such property may also be removed in the normal course of debris or trash collection before or after a period of forty eight (48) hours.

March 7, 2025


Ravenel Magistrate

_____, being duly sworn state that:

- I personally served a copy of this Writ on _____, an occupant of the rental unit
- On _____ 20____, at _____ the rental unit appeared unoccupied and no one responded when I announced my identity and intentions. I attached a copy of this Writ to a conspicuous part of the premise.
- On _____ 20____, at _____, which was not less than 24 hours from the posting date and time, I returned to the rental unit for the purpose of ejectment.
- Under my supervision, I had all persons and personal property removed and evicted from the rental unit placing all personal property beside the roadside.
- The rental unit was unoccupied. The Tenant and all occupants had vacated the unit.
- Informed by Plaintiff that case is settled.

Date: _____, 20____

Sheriff/Deputy Sheriff/Constable

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)
))
))
HILL FAMILY 2008 TRUST)
YVONNE H. HEROLD TRUSTEE,)
Respondent/Plaintiff)
))
vs)
))
TERESA K. ZACHRY, fka, TERESA Z. HILL)
Appellant/Defendant)
_____)

COURT OF COMMON PLEAS
CASE NO: 2025-CP-10-1379

MAGISTRATE'S RETURN

MAGISTRATE'S COURT CASE NO.
2025CV1011200030

FILED
2025 JUN 25 AM 8:50
JULIE J. ARMSTRONG
CLERK OF COURT


COMES NOW, Sheryl M. Perry, Magistrate in and for Charleston County, South Carolina, who offers this as her return to the Notice of Appeal filed by the named Defendant, Teresa K. Zachry, fka, Teresa Z. Hill appealing this court's order.

The Plaintiff, Hill Family 2008 Trust/Yvonne H. Herold, Trustee, filed an Application for Ejectment on January 27, 2025, at the Ravenel Magistrate Court. In the Plaintiff's Complaint, the grounds for Ejectment where permission to occupy building and land are withdrawn. Service paperwork and the Application for Ejectment were issued to the court's constable for service on the Defendant. Service of the Ejectment papers were attempted on two different dates and times by the court constable, Cassie Watson. The first attempt of service was on Tuesday, January 28, 2025, at 1430 hrs. and the second attempt was on Friday, January 31, 2025, at 0935 hrs. Constable Watson was unable to serve the Defendant on both attempts. The court then notified the Plaintiff, Yvonne H. Herold, Trustee, that Constable Watson was unable to personally serve the Defendant and a fee of \$5.00 was due to complete and verify a Non-Service Mailing to the Defendant. (See section 27-40-710 2000

Supplement of SC Code of Laws and Section 8-21-1010 as amended.) The Plaintiff paid the \$5.00 and a certified letter was mailed to the Defendant, Teresa K. Zachry, fka, Teresa Z. Hill on February 5, 2025, asking her to contact the Magistrate's court immediately to avoid her possessions being removed from the premises. The Defendant refused the certified mail attempts and did not respond to the court by phone, written notice nor did she appear personally to the court. After 21 days from the date of February 3, 2025 the court issued the Writ of Ejectment on March 7, 2025. Constable Watson then posted the Writ of Ejectment on the Defendant's door at 6209 Savannah Hwy, on March 12, 2025 at 1222hrs. On March 13, 2025 Constable Watson and the plaintiff Yvonne H. Herold, Trustee met at 6209 Savannah Hwy, Ravenel, SC. to proceed with the eviction and the removal of the Defendants possessions. The defendant was able to file an appeal and present it to the court and at that time the court stopped the eviction.

Now having fully answered the appeal, Judge Sheryl M. Perry, prays that the court affirm this Court's decision.

Respectfully Submitted,



THE HONORABLE SHERYL M. PERRY
CHARLESTON COUNTY MAGISTRATE

This 23rd day of June, 2025

Charleston County, South Carolina

**STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON**

Teresa K Zachry
6209 Savannah Hwy Suite A
Ravenel, SC 29470

RE: Hill Family 2008 Trust

Vs Teresa K Zachry

PLAINTIFF(S)

DEFENDANT(S)

CASE #: 2025CV1011200030

ADDRESS: 6209 Savannah Hwy Suite A

A Court Order has been issued to evict you and your possessions from this property. You must contact this Court immediately to avoid your possessions being removed from the premises.

**Ravenel Magistrate
5962 Highway 165, Suite 200
Ravenel, SC 29470
Phone: (843) 889-8332 Fax: (843) 889-9202**

February 3, 2025

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)
)
)

2025CV1011200030
CIVIL CASE NUMBER
IN THE MAGISTRATE'S COURT
AFFIDAVIT OF SERVICE

Hill Family 2008 Trust
6010 Martin Street
Ravenel, SC 29470
(843) 693-7594

PLAINTIFF(S)

Vs

Teresa K Zachry
6209 Savannah Hwy Suite A
Ravenel, SC 29470

DEFENDANT(S)

Yvonne H Herold
6010 Martin Street
Ravenel, SC 29470
(843) 693-7594

PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being duly sworn

says that (s)he served the Writ of Ejectment in this action

(Describe document(s) served)

on Teresa K. Zachry by delivery to

(Name of party served)

_____ personally;

(Name of party served)

_____ the _____ of the party served,

(Name of person served)

(Note relationship to party)

and a person of discretion residing at the residence of the party served;

_____ the _____ of _____

(Name of person served)

(Title)

(Name of corporate party served)

and leaving with (him) (her) a copy at _____

(Street address)

in Ravenel Charleston County, South Carolina,

(City or Town)

County

on 12 MARCH 2025 at 1222 o'clock

that deponent knows the person so served, and that deponent is not a party of this action, is not less than eighteen (18) years of age and has no interest therein or connection therewith.

Unable to locate and serve the above process on the defendant after diligent efforts to do so. The process is returned unexecuted.

Sworn to and Subscribed before me

this 12th day of March, 2025

[Signature]

Signature of Deponent

[Signature]
Notary Public for South Carolina

My Commission expires _____

) Entered in the Sheriff's Service Book on _____

) Book _____ Page _____ Number _____

Return to:

Ravenel Magistrate
5962 Highway 165, Suite 200
Ravenel, SC 29470
Phone: (843) 889-8332
Fax: (843) 889-9202

May 27, 2032

May 27, 2032

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

7016 1370 0000 6432 4824

Certified Mail Fee		
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$	
<input type="checkbox"/> Return Receipt (electronic)	\$	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	
Postage	\$	
Total Postage and Fees	\$	

Postmark
Here

Sent To Teresa K. Zachry
 Street and Apt. No., or PO Box No. 6209 Savannah Hwy
 City, State, Zip+4 Ravenel SC 29470

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



RAVENEL/ADAMS REN/HOLLYWOOD MAGISTRATE COURT
5962 Hwy. 165, Ste. 200
Ravenel, SC 29470
Return Service Requested

CERTIFIED MAIL®



7016 1370 0000 6432 4824



Teresa K Zachry
2/11/2025
ins

Teresa K Zachry
6209 Savannah Hwy Suite A
Ravenel, SC 29470

294 709 5583 50

NIXIE 296 DE 1 0002/20/25
RETURN TO SENDER
UNABLE TO FORWARD
BC: 29470559050 *2927-03026-05-40

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOR BEST POSTAGE

2025CV1011200030


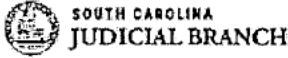
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p> <p>B. Received by (<i>Printed Name</i>) C. Date of Delivery</p>
<p>1. Article Addressed to:</p> <p><i>Teresa K. Zachry 6209 Savannah Hwy. Suite A Ravenel, SC 29470</i></p>  <p>9590 9402 2327 6225 3294 89</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (<i>Transfer from service label</i>)</p> <p>7016 1370 0000 6432 4824</p>	<p>3. Service Type <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Registered Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery (00)</p>
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 <i>2025CV1011200030</i> Domestic Return Receipt</p>	

Exhibit D

ELECTRONICALLY FILED - 2026 Jan 29 11:42 AM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379



STATE OF SOUTH CAROLINA
COUNTY OF Charleston

IN THE COURT OF COMMON PLEAS

Civil Action Coversheet

Teresa Hill
Plaintiff(s) Appellant

v.
Hill Family Trust 2008 (Arizona)
Defendant(s) Respondent

Case No. 2025-CP-10-1379

Submitted By: Teresa Hill
Address: 6204 Savannah Blvd
Rowland, SC 29470

SC Bar Number: 15798
Telephone #: 843-581-2261
Fax #: _____
Other: _____
Email: Zachary Law Firm @pm, me

Hill Family Trust 2008 - Arizona
Yellowe Herald - 6010 Martin St Rowland, SC

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. **This form is NOT required to be filed in E-Filed Cases.**

FILED
2025 MAR 13 PM 4:12
CLERK OF COURT

DOCKETING INFORMATION (Check all that apply)

**If Action is Judgment/Settlement do not complete*

- JURY TRIAL** demanded in complaint.
- NON-JURY TRIAL** demanded in complaint.
- This case is subject to **ARBITRATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to **MEDIATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Certificate Attached)

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRPC, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

Submitting Party Signature: [Signature]
Date: 3/13/2025

SCCA 234 (Revised 11/2024)



SOUTH CAROLINA
JUDICIAL BRANCH

Nature of Action (Check one box below)

Contracts

- Constructions (100)
- Debt Collection (110)
- General (130)
- Breach of Contract (140)
- Fraud/Bad Faith (150)
- Failure to Deliver/Warranty (160)
- Employment Discrim (170)
- Employment (180)
- Other (199)

Torts- Professional Malpractice

- Dental Malpractice (200)
 - Legal Malpractice (210)
 - Medical Malpractice (220)
 - Notice of Intent Case #
-
- Notice File. Med Mal (230)
 - Other (299)

Torts- Personal Injury

- Conversion (310)
- Motor Vehicle Accident (320)
- Premises Liability (330)
- Products Liability (340)
- Personal Injury (350)
- Wrongful Death (360)
- Assault/Battery (370)
- Slander/Libel (380)
- Other (399)

Inmate Petitions

- PCR (500)
- Mandamus (520)
- Habeas Corpus (530)
- Other (599)

Real Property

- Claim & Delivery (400)
- Condemnation (410)
- Foreclosure (420)
- Mechanic's Lien (430)
- Partition (440)
- Possession (450)
- Building Code Violation (460)
- Other (499)

Judgments/Settlements

- Death Settlement (700)
- Foreign Judgment (710)
- Magistrate's Judgment (720)
- Minor Settlement (730)
- Transcript Judgment (740)
- Lis Pendens (750)
- Transfer of Structured Settlement Application Payment Rights (760)
- Confession of Judgment (770)
- Petition for Workers Compensation Settlement Approval (780)
- Incapacitated Adult Settlement (790)
- Other (799)

Administrative Law/Relief

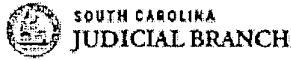
- Reinstate Driver's License (800)
- Judicial Review (810)
- Relief (820)
- Permanent Injunction (830)
- Forfeiture- Petition (840)
- Forfeiture- Consent Order (850)
- Other (899)

Special/Complex/Other

- Environmental (600)
- Automobile Arb. (610)
- Medical (620)
- Pharmaceuticals (630)
- Unfair Trade Practices (640)
- Out of State Depositions (650)
- Motion to Quash Subpoena in an Out of County Action (660)
- Pre-Suit Discovery (670)
- Permanent Restraining Order (680)
- Interpleader (690)
- Other (699)

Appeals

- Arbitration (900)
- Magistrate- Civil (910)
- Magistrate- Criminal (920)
- Municipal (930)
- Probate Court (940)
- SCDOT (950)
- Worker's Comp (960)
- Zoning Board (970)
- Public Service Comm. (990)
- Employment Service Comm. (991)
- Other (999)



Effective January 1, 2016, Alternative Dispute Resolution (ADR) is mandatory in all counties, pursuant to Supreme Court Order dated November 12, 2015.

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

Pursuant to the ADR Rules, you are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs.
4. Cases are exempt from ADR under ADR Rule 3(b) upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals;
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. Cases may also be exempt from ADR under ADR Rule 3(c) upon motion to and approval by the court.
6. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
7. Application of a party to be exempt from payment of neutral fees due to indigency should be filed with the Clerk of Court prior to the scheduling of the ADR conference.

Please Note: You must comply with the Supreme Court Rules regarding ADR.

SCCA 234 (Revised 11/2024)



SOUTH CAROLINA
JUDICIAL BRANCH

Failure to do so may affect your case or may result in sanctions.

)	2025-CP-10-1379
)	COMMON PLEAS CASE NUMBER
STATE OF SOUTH CAROLINA)	
)	2025cv1011200030
COUNTY OF CHARLESTON)	MAGISTRATE CIVIL CASE NUMBER
)	
TERESA ZACHRY HILL)	
)	IN THE COURT OF COMMON PLEAS
APPELLANT(S))	
)	NOTICE OF CIVIL APPEAL
VS.)	
)	
HILL FAMILY TRUST 2008 of ARIZONA)	
)	
RESPONDENT(S))	

The defendant Teresa Zachry Hill hereby gives notice of appeal from the judgment of the magistrate's court in the above action, to the Circuit Court of Common Pleas, in the County of Charleston.

This notice of appeal is made subsequent to personal notice of the judgment, which was received left on my office door at 6209 Savannah Hwy., Ravenel, South Carolina on the 12 day of March, 2025.

The appellant's exceptions to the judgment of the magistrate are set forth as follows: Appellant was not served with the pleadings in this matter. The Magistrate's Court lacks jurisdiction of this matter. The matter was filed under the South Carolina Landlord-Tenant Act. Appellant is not a tenant. Appellant is an owner. Appellant has never been a tenant and therefore not subject to the South Carolina Landlord-Tenant Act.

Appellant request that the wrongful writ of ejection issued by Ravenel Magistrate Sheryl Perry be stayed pending the appeals process.

(SIGNATURE PAGE TO FOLLOW)

FILED
 2025 MAR 13 PM 4:12
 CLERK OF COURT

S/Teresa Zachry Hill

Teresa Zachry Hill, Esquire
SC 15792

6209 Savannah Highway

P.O. Box 369

Ravenel, SC 29470

(843) 889-2261 – Telephone

(843) 889-2262 – Telephone

ZachryHillFirm@pm.me

SCCA/720 (Amended 8/1/2011)

Hill - Exhibits to Return - 022

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	JUDICIAL CIRCUIT
COUNTY OF CHARLESTON)	
)	
)	CERTIFICATE OF TECHNICAL FAILURE
)	OR TECHNICAL DIFFICULTIES
TERESA HILL)	
)	Plaintiff
vs.)	
)	Case No.:
HILL FAMILY TRUST 2008 (ARIZONA))	
)	Defendant.

2025 MAR 13 PM 4:12
 COURT REPORTING
 HILL

Pursuant to the *South Carolina Electronic Filing Policies and Guidelines*, TERESA HILL, Attorney for the plaintiff(s)/defendant(s), seeks to file the attached NOTICE OF CIVIL APPEAL by a Traditional Filing Method/Alternative Method of Submission based on the inability to Electronically File the document. The inability to Electronically File the document was caused by:

- An announced Technical Failure of the Electronic Filing System;
- A technical difficulty that prevented the successful E-Filing of this document, which is described in detail below, including a statement certifying compliance with Section 9(d) of the Policies and Guidelines;
- A Repeated Technical Difficulty, which is described in detail below, including a statement certifying compliance with Section 9(f) of the Policies and Guidelines;
- ; or
- The document is excluded from the requirement that it be E-Filed in accordance with Section 2(d) of the Policies and Guidelines.

I have served or will serve this notice and the attached NOTICE OF INTENT TO APPEAL on all parties to this action by the following means:

I declare under penalty of perjury that the foregoing is true and correct.

I attempted to file on March 13, 2025 at Notice of Intent to appeal Charleston County Magistrates Court Case 2025CV1011200030 to the Charleston County Court of Common Pleas. There were multiple attempts to file the Notice of Intent to Appeal each time an error message of 99APCV case subtype initial action required VACT00010JE2jscF_VACT00010 was received. I contacted the Charleston County Court of Common Pleas the clerk there attempted to assist me with the error. She was not able to assist me in completing the filing and provided me information that there is an issue with the filing system. She provided at my request the South Carolina Supreme Court SCCA/293 (8/2016)

support line number of 1-855-235-2500. I called and spoke with a lady who also reported issues with the e-filing system. She did walk me through another attempt to e-file. The result was the same, which was error message of 99APCV case subtype initial action required VACT00010JE2jseF_VACT00010 was received. She then directed me to this report to file with Charleston County.

S/Teresa Zachry Hill

Teresa Zachry Hill, Esquire
SC 15792
6209 Savannah Highway
P.O. Box 369
Ravenel, SC 29470
(843) 889-2261 – Telephone
(843) 889-2262 – Telephone
ZachryHillFirm@pmi.me

SCCA/293 (8/2016)

STATE OF SOUTH CAROLINA
COUNTY OF Charleston
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2025CP1001379

Teresa Zachry Hill
PLAINTIFF(S)

Hill Family Trust 2008 of Arizona
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled);
 Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

This matter came before the Court on June 26, 2025 on Appeal from the Magistrate's Court. Upon review of the record, the Court finds no error of law nor of fact and affirms the holding of the lower court.

ORDER INFORMATION

This order ends does not end the case. See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 07/08/2025 .

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Charleston Common Pleas

Case Caption: Teresa Zachry Hill VS Hill Family Trust 2008 of Arizona

Case Number: 2025CP1001379

Type: Order/Electronic Form 4

So Ordered

s/ Maite Murphy 2166

Electronically signed on 2025-07-16 16:06:36 page 3 of 3

The South Carolina Court of Appeals

Hill Family Trust 2008 of Arizona, and Yvonne Herold,
Respondents,

v.

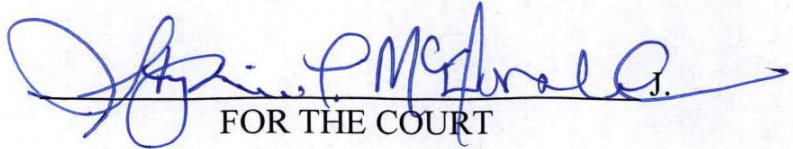
Teresa Hill, Appellant.

Appellate Case No. 2025-001651

ORDER

On September 19, 2025, Respondents moved to dismiss the appeal and enforce ejectment on the grounds Appellant failed to post the statutorily-required bond to maintain an appeal pursuant to section 27-37-130 of the South Carolina Code (2007), ejectment orders are not stayed on appeal, and Appellant has refused to vacate the property. In the alternative, Respondents request Appellant be required to immediately post a bond in the amount of \$720,000. Appellant did not file a return.

After careful consideration, we deny Respondent's motion to dismiss the appeal and enforce ejectment. *Compare* S.C. Code Ann. § 27-40-800(f)(1) (2007) ("Upon appeal to the Supreme Court or to the court of appeals, it is sufficient to stay execution of a judgment for ejectment that the tenant sign an undertaking that he will pay to the landlord the amount of rent, determined by order of the judge of the circuit court, as it becomes due periodically after judgment was entered. The judge of the court having jurisdiction shall order stay of execution upon the undertaking.") *with* § 27-37-130 (providing (1) an appeal to the circuit court in an ejectment case will not stay ejectment unless the tenant shall give an appeal bond and (2) if the tenant fails to file the bond within five days after service of the notice of appeal the appeal shall be dismissed by the "trial magistrate."). Further, we deny Respondent's alternative request for Appellant to post a bond because consideration of a bond—or the lack of a bond—is a motion more properly made to the circuit court.


FOR THE COURT

Columbia, South Carolina

FILED
Nov 19 2025

cc:

Teresa Zachry Hill, Esquire

Daniel Scott Slotchiver, Esquire

Anna Elizabeth Richter, Esquire

Jesse Sanchez, Esquire

Exhibit G

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON)	CASE NO.: 2025-CP-10-0137
)	
HILL FAMILY 2008 TRUST,)	
YVONNE H. HEROLD, TRUSTEE,)	
Respondent/Plaintiff,)	RESPONDENT’S MOTION TO
)	REQUIRE APPELLANT TO POST
vs.)	A BOND AND/OR TO ENFORCE
)	EJECTMENT
TERESA K. ZACHRY, fka, TERESA Z. HILL,)	(On an Expedited Basis)
Appellant/Defendant.)	

TO: TERESA K. ZACHRY, fka, TERESA Z. HILL, *PRO SE* APPELLANT/DEFENDANT

PLEASE TAKE NOTICE that the above-named Respondents, Hill Family 2008 Trust, Yvonne Herold, Trustee, by and through their undersigned attorney, hereby move the Court, on an expedited basis, for an Order Requiring Appellant/Defendant above-named to post a bond and/or enforcing the court-ordered ejectment in this action. The grounds for this motion are as follows: 1) Appellant has failed to post the statutorily-required bond to maintain an appeal pursuant to S.C. Code Ann. § 27-37-130 and the time for doing so has expired, 2) ejectment orders are not stayed on appeal pursuant to Rule 241(b)(10), SCACR, 3) Appellant has refused to vacate the property despite the court-ordered ejectment, and 4) pursuant to the Order of the Court of Appeals dated November 19, 2025 (a copy of which is attached hereto as **Exhibit A**).

PROCEDURAL BACKGROUND

The Charleston County Magistrate Court issued a Writ of Ejectment on March 7, 2025 (Case No. 2025CV1011200030), ordering Appellant to vacate Respondents’ property at 6209 Savannah Highway, Ravenel, South Carolina. (Writ of Ejectment and Magistrates Return, a copy of which is attached hereto as **Exhibit B**).

On March 13, 2025, Appellant appealed to the Circuit Court. However, Appellant did not post a bond within five days from the March 7, 2025 ejectment order, as expressly required by S.C. Code Ann. § 27-37-130 to maintain an appeal.¹ (Notice of Appeal to Circuit Court, a copy of which is attached hereto as **Exhibit C**). On July 16, 2025, the Circuit Court affirmed the Magistrate’s Ejectment Order, finding “no error of law or of fact.” (Circuit Court Order, a copy of which is attached hereto as **Exhibit D**). The Circuit Court denied Appellant’s Motion to Reconsider on August 7, 2025.

Appellant filed a subsequent appeal to this Honorable Court on August 14, 2025 and continues to wrongfully occupy Respondents’ property. On September 19, 2025, Respondents moved to dismiss the appeal and enforce the ejectment order, as Appellant failed to post the statutorily-required bond to maintain an appeal pursuant to Section 27-37-130 of the S.C. Code of Laws, ejectment orders are not stayed on appeal, and Appellant has refused to vacate the property; or in the alternative, to require Appellant to post a bond in the amount of \$720,000. Appellant failed to file a return to Respondent’s Motion. On November 19, 2025, the Court of Appeals issued an Order denying Respondent’s motion to dismiss the appeal and enforce ejectment. The Order further denies Respondent’s request for Appellant to post a bond and states that “...consideration of a bond—of the lack of a bond—is a motion more properly made to the circuit court.” Accordingly, Respondent has filed the instant motion for the Circuit Court’s consideration, and requests a hearing on an expedited basis.

¹ S.C. Code Ann. § 27-37-130 provides: “An appeal in an ejectment case will not stay ejectment unless at the time of appealing the tenant shall give an appeal bond as in other civil cases for an amount to be fixed by the magistrate and conditioned for the payment of all costs and damages which the landlord may sustain thereby. In the event the tenant shall fail to file the bond herein required within five days after service of the notice of appeal such appeal shall be dismissed by the trial magistrate.” (Emphasis added).

ARGUMENT

I. The Appellant Must Post the Statutorily-Required Bond in Order to Maintain an Appeal, and Appellant has Failed to do so.

S.C. Code § 27-37-130 expressly mandates that an appeal bond must be posted to maintain an ejectment appeal. As quoted below, the statute provides that an appeal will not stay ejectment without a bond and that failure to file the required bond within five days requires dismissal of the appeal (“such appeal *shall* be dismissed.”).

The plain language of this statute sets forth two clear requirements, which Appellant has failed to meet:

1. An appeal bond must be posted “at the time of appealing” to obtain a stay, and
2. Failure to file the bond within five days requires dismissal of the appeal.

Here, Appellant has failed to post any bond whatsoever. She did not post a bond at the time of the initial appeal to Circuit Court, she did not post one during the Circuit Court proceedings, and she has not posted one upon appeal to the Court of Appeals. “The cardinal rule of statutory construction is to ascertain and effectuate the intent of the legislature. Under the plain meaning, it is not the court’s place to change the meaning of a clear and unambiguous statute. Where the statute’s language is plain and unambiguous, and conveys a clear and definite meaning, the rules of statutory interpretation are not needed and the court has no right to impose another meaning. What a legislature says in the text of a statute is considered the best evidence of the legislative intent or will. Therefore, the courts are bound to give effect to the expressed intent of the legislature.” *Hodges v. Rainey*, 341 S.C. 79, 85, 533 S.E.2d 578 (2000) (internal citations omitted). The legislature’s intent is clear: without a bond, there is no stay, and the appeal *shall* be dismissed if the appellant does not post a bond within five days after service of the notice of appeal.

On December 15, 2025, Counsel for Plaintiff wrote to Appellant requesting the parties coordinate a mutually agreeable date for Plaintiff to inspect the property. (See letter to Defendant/Appellant dated December 15, 2025, attached hereto as **Exhibit E**). On December 30, 2025, Appellant wrote an email response to Respondent’s counsel wherein Appellant advised she is refusing to allow Respondent of their attorneys to inspect the building, and further advises “**[n]either you nor your clients will set foot in my building, my business, or my home.**”[sic]. (See email from Teresa Hill dated December 30, 2025, attached hereto as **Exhibit F**).

Accordingly, Respondents respectfully request that this Court issue an Order requiring Appellant to post a bond in the amount of \$265,074.48 pursuant to S.C. Code § 27-37-130.

II. Ejectment Orders Are Expressly Excepted from Automatic Stays.

Rule 241(b)(10) of the South Carolina Appellate Court Rules carves out a specific exception to the general rule regarding automatic stays on appeal. While the general rule provides that “the service of a notice of appeal in a civil matter acts to automatically stay matters decided in the order,” Rule 241(b)(10) expressly excepts: “Ejectment orders as provided in S.C. Code Ann. § 27-37-130 and S.C. Code Ann. § 27-40-800.” This is an ejectment action pursuant to S.C. Code § 27-37-130. Accordingly, there is no automatic stay.

This exception applies at every level of appeal. The ejectment order is not stayed and continues to be enforceable despite the pendency of this appeal. Despite this requirement, Appellant, who is a lawyer and has chosen to represent herself *Pro Se*, has refused to evacuate the premises for nearly nine (9) months causing great harm to Respondents. Respondents respectfully submit that this Honorable Court should enforce the ejectment because Appellant has failed to post a bond to maintain this appeal and the statutory timeframe for doing so has expired and because orders for ejectment are not automatically stayed by the filing of an appeal.

III. Respondents Have Been Prejudiced by the Ongoing Delay.

Respondents have been deprived of the use, possession, and ability to collect rent on their property since March 2025. Every additional day of delay compounds this prejudice. The bond requirement exists precisely to protect property owners in this situation, and Appellant's failure to comply with this requirement while continuing to occupy the property constitutes ongoing harm to Respondents.

IV. The Circuit Court Should Require Appellant Post a Bond and/or Enforce the Ejectment Order.

On November 19, 2025, the Court of Appeals issued an Order denying Respondent's motion to dismiss the appeal and enforce ejectment. The Order further denies Respondent's request for Appellant to post a bond and states that "...consideration of a bond—of the lack of a bond—is a motion more properly made to the circuit court." Accordingly, Respondent has filed the instant motion for the Circuit Court's consideration, and requests a hearing on an expedited basis. Based on the direction of the Court of Appeals, this issue is properly before the Circuit Court and is ripe for the Circuit Court's consideration. The Circuit Court should require Appellant post a bond and enforce the Ejectment Order if Appellant fail to post a bond within five (5) days as required by statute. S.C. Code § 27-37-130 expressly mandates that an appeal bond must be posted to maintain an ejectment appeal. The statute provides that an appeal will not stay ejectment without a bond and that failure to file the required bond within five (5) days requires dismissal of the appeal.

CONCLUSION

For nearly ten (10) months, Appellant has occupied Respondents' property while pursuing appeals without posting any bond as required by the express language S.C. Code § 27-37-130. Despite knowing that ejectment orders are not automatically stayed on appeal,

Appellant, who is a practicing attorney licensed in the State of South Carolina, has refused to vacate the property.

South Carolina law is clear and unambiguous: an appeal in an ejectment case does not stay the ejectment and appellants are required to post a statutorily-required bond within five days of appeal in order to maintain the appeal. Appellant has failed to post a bond or evacuate the property. Therefore, this Court should:

1. Require Appellant to immediately post a bond pursuant to Section 27-37-130, S.C. Code of Laws; and
2. Direct immediate enforcement of the ejectment order issued by the Magistrate Court and affirmed by the Circuit Court if Appellant fails to post a bond, as she has currently failed to do.

Respondents request that Appellant be required to immediately post a bond in the amount of \$265,074.48 to cover potential damages during the pendency of this appeal, representing reasonable rent of \$7,363.18 per month for the anticipated duration of appellate proceedings.²

Respectfully Submitted,

SLOTCHIVER & SLOTCHIVER, LLP

/s/Anna E. Richter

Anna E. Richter
 arichter@slotchiverlaw.com
 Daniel S. Slotchiver
 dan@slotchiverlaw.com
 Slotchiver & Slotchiver, LLP
 751 Johnnie Dodds Boulevard Suite 100

² Respondents assert that reasonable rent for 6209 Savannah Highway is \$7,363.18 per month and the pendency of an appeal will likely last three years. Thus, a bond in the amount of \$265,074.48 is appropriate.

Mount Pleasant, SC 29464
(843) 577-6531

**ATTORNEYS FOR RESPONDENT
HILL FAMILY 2008 TRUST,
YVONNE HERALD, TRUSTEE**

January 29, 2026
Mount Pleasant, South Carolina

The South Carolina Court of Appeals

Hill Family Trust 2008 of Arizona, and Yvonne Herold,
Respondents,

v.

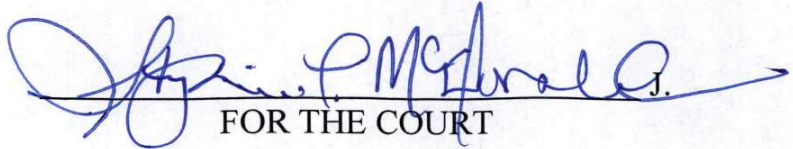
Teresa Hill, Appellant.

Appellate Case No. 2025-001651

ORDER

On September 19, 2025, Respondents moved to dismiss the appeal and enforce ejectment on the grounds Appellant failed to post the statutorily-required bond to maintain an appeal pursuant to section 27-37-130 of the South Carolina Code (2007), ejectment orders are not stayed on appeal, and Appellant has refused to vacate the property. In the alternative, Respondents request Appellant be required to immediately post a bond in the amount of \$720,000. Appellant did not file a return.

After careful consideration, we deny Respondent's motion to dismiss the appeal and enforce ejectment. *Compare* S.C. Code Ann. § 27-40-800(f)(1) (2007) ("Upon appeal to the Supreme Court or to the court of appeals, it is sufficient to stay execution of a judgment for ejectment that the tenant sign an undertaking that he will pay to the landlord the amount of rent, determined by order of the judge of the circuit court, as it becomes due periodically after judgment was entered. The judge of the court having jurisdiction shall order stay of execution upon the undertaking.") *with* § 27-37-130 (providing (1) an appeal to the circuit court in an ejectment case will not stay ejectment unless the tenant shall give an appeal bond and (2) if the tenant fails to file the bond within five days after service of the notice of appeal the appeal shall be dismissed by the "trial magistrate."). Further, we deny Respondent's alternative request for Appellant to post a bond because consideration of a bond—or the lack of a bond—is a motion more properly made to the circuit court.


FOR THE COURT

Columbia, South Carolina

FILED
Nov 19 2025

cc:

Teresa Zachry Hill, Esquire
Daniel Scott Slotchiver, Esquire
Anna Elizabeth Richter, Esquire
Jesse Sanchez, Esquire

ELECTRONICALLY FILED - 2026 Jan 29 11:42 AM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
)
)
)

2025CV1011200030
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT
WRIT OF EJECTMENT

Hill Family 2008 Trust
6010 Martin Street
Ravenel, SC 29470
(843) 693-7594

PLAINTIFF(S)
Vs
Teresa K Zachry
6209 Savannah Hwy Suite A
Ravenel, SC 29470

DEFENDANT(S)
TO THE SHERIFF/MAGISTRATE'S CONSTABLE:

Upon Judgment of this Court, rendered on the 7th day of March, 2025, you are hereby Ordered to proceed to the premises located at **6209 Savannah Hwy Suite A Ravenel, SC 29470.**

Announce your identity and purpose and serve on the defendant(s) and all occupants a copy of this Writ of Ejectment. Inform them they have **twenty four (24) hours to voluntarily vacate** the premises. **If the premises appear unoccupied and no one responds** to your announced identity and purpose, the Writ of Ejectment shall be served by securely attaching a copy of the Writ in a conspicuous place on the premises.

If after 24 hours following the service or posting of the Writ, the occupants have not voluntarily vacated the premises, **a deputy sheriff may enter the premises** using only as much force as is necessary to effectuate the Ejectment.

Upon gaining access, you shall **remove from the premises any occupants and all items of personal property found on the premises. Such property may be deposited beside the public street or roadway.** All personal property removed from the premises and placed on a public street or roadway may be removed by the proper local government agency after forty eight (48) hours, excluding Saturdays, Sundays, and holidays. Such property may also be removed in the normal course of debris or trash collection before or after a period of forty eight (48) hours.

March 7, 2025


Ravenel Magistrate

_____, being duly sworn state that:

- I personally served a copy of this Writ on _____, an occupant of the rental unit
- On _____ 20____, at _____ the rental unit appeared unoccupied and no one responded when I announced my identity and intentions. I attached a copy of this Writ to a conspicuous part of the premise.
- On _____ 20____, at _____, which was not less than 24 hours from the posting date and time, I returned to the rental unit for the purpose of ejectment.
- Under my supervision, I had all persons and personal property removed and evicted from the rental unit placing all personal property beside the roadside.
- The rental unit was unoccupied. The Tenant and all occupants had vacated the unit.
- Informed by Plaintiff that case is settled.

Date: _____, 20____

Sheriff/Deputy Sheriff/Constable

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)
))
))
HILL FAMILY 2008 TRUST)
YVONNE H. HEROLD TRUSTEE,)
Respondent/Plaintiff)
))
vs)
))
TERESA K. ZACHRY, fka, TERESA Z. HILL)
Appellant/Defendant)
_____)

COURT OF COMMON PLEAS
CASE NO: 2025-CP-10-1379

MAGISTRATE'S RETURN

MAGISTRATE'S COURT CASE NO
2025CV1011200030

FILED
2025 JUN 25 AM 8:50
JULIE J. ARMSTRONG
CLERK OF COURT


COMES NOW, Sheryl M. Perry, Magistrate in and for Charleston County, South Carolina, who offers this as her return to the Notice of Appeal filed by the named Defendant, Teresa K. Zachry, fka, Teresa Z. Hill appealing this court's order.

The Plaintiff, Hill Family 2008 Trust/Yvonne H. Herold, Trustee, filed an Application for Ejectment on January 27, 2025, at the Ravenel Magistrate Court. In the Plaintiff's Complaint, the grounds for Ejectment where permission to occupy building and land are withdrawn. Service paperwork and the Application for Ejectment were issued to the court's constable for service on the Defendant. Service of the Ejectment papers were attempted on two different dates and times by the court constable, Cassie Watson. The first attempt of service was on Tuesday, January 28, 2025, at 1430 hrs. and the second attempt was on Friday, January 31, 2025, at 0935 hrs. Constable Watson was unable to serve the Defendant on both attempts. The court then notified the Plaintiff, Yvonne H. Herold, Trustee, that Constable Watson was unable to personally serve the Defendant and a fee of \$5.00 was due to complete and verify a Non-Service Mailing to the Defendant. (See section 27-40-710 2000

Supplement of SC Code of Laws and Section 8-21-1010 as amended.) The Plaintiff paid the \$5.00 and a certified letter was mailed to the Defendant, Teresa K. Zachry, fka, Teresa Z. Hill on February 5, 2025, asking her to contact the Magistrate's court immediately to avoid her possessions being removed from the premises. The Defendant refused the certified mail attempts and did not respond to the court by phone, written notice nor did she appear personally to the court. After 21 days from the date of February 3, 2025 the court issued the Writ of Ejectment on March 7, 2025. Constable Watson then posted the Writ of Ejectment on the Defendant's door at 6209 Savannah Hwy, on March 12, 2025 at 1222hrs. On March 13, 2025 Constable Watson and the plaintiff Yvonne H. Herold, Trustee met at 6209 Savannah Hwy, Ravenel, SC. to proceed with the eviction and the removal of the Defendants possessions. The defendant was able to file an appeal and present it to the court and at that time the court stopped the eviction.

Now having fully answered the appeal, Judge Sheryl M. Perry, prays that the court affirm this Court's decision.

Respectfully Submitted,



THE HONORABLE SHERYL M. PERRY
CHARLESTON COUNTY MAGISTRATE

This 23rd day of June, 2025

Charleston County, South Carolina

**STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON**

Teresa K Zachry
6209 Savannah Hwy Suite A
Ravenel, SC 29470

RE: Hill Family 2008 Trust Vs Teresa K Zachry

PLAINTIFF(S)

DEFENDANT(S)

CASE #: 2025CV1011200030

ADDRESS: 6209 Savannah Hwy Suite A

A Court Order has been issued to evict you and your possessions from this property. You must contact this Court immediately to avoid your possessions being removed from the premises.

**Ravenel Magistrate
5962 Highway 165, Suite 200
Ravenel, SC 29470
Phone: (843) 889-8332 Fax: (843) 889-9202**

February 3, 2025

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)
)
)
)

2025CV1011200030
CIVIL CASE NUMBER
IN THE MAGISTRATE'S COURT
AFFIDAVIT OF SERVICE

Hill Family 2008 Trust
6010 Martin Street
Ravenel, SC 29470
(843) 693-7594

PLAINTIFF(S)

Vs

Teresa K Zachry
6209 Savannah Hwy Suite A
Ravenel, SC 29470

DEFENDANT(S)

Yvonne H Herold
6010 Martin Street
Ravenel, SC 29470
(843) 693-7594

PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being duly sworn

says that (s)he served the Writ of Ejectment in this action

(Describe document(s) served)

on Teresa K. Zachry by delivery to

(Name of party served)

_____ personally;
(Name of party served)

_____ the _____ of the party served,
(Name of person served) (Note relationship to party)

and a person of discretion residing at the residence of the party served;

_____ the _____ of _____
(Name of person served) (Title) (Name of corporate party served)

and leaving with (him) (her) a copy at _____

(Street address)

in Ravenel Charleston County, South Carolina,

(City or Town)

County

on 12 MARCH 2025 at 1222 o'clock

that deponent knows the person so served, and that deponent is not a party of this action, is not less than eighteen (18) years of age and has no interest therein or connection therewith.

Unable to locate and serve the above process on the defendant after diligent efforts to do so. The process is returned unexecuted.

Sworn to and Subscribed before me
this 12th day of March, 2025

[Signature]
Signature of Deponent

[Signature]
Notary Public for South Carolina

My Commission expires _____

me) Entered in the Sheriff's Service Book on _____
) Book _____ Page _____ Number _____

Return to:

Ravenel Magistrate
5962 Highway 165, Suite 200
Ravenel, SC 29470
Phone: (843) 889-8332
Fax: (843) 889-9202

May 27, 2032
May 27, 2032

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

7016 1370 0000 6432 4824

Certified Mail Fee		\$
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$	
<input type="checkbox"/> Return Receipt (electronic)	\$	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	
Postage	\$	
Total Postage and Fees	\$	

Sent To: *Teresa K. Zachry*
 Street and Apt. No. or PO Box No. *6209 Savannah Hwy*
 City, State, ZIP+4® *Ravenel SC 29470*

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



RAVENEL/ADAMS ~~TON~~/HOLLYWOOD MAGISTRATE COURT
 5962 Hwy. 165, Ste. 200
 Ravenel, SC 29470

Return Service Requested

Teresa K Zachry
 6209 Savannah Hwy Suite A
 Ravenel, SC 29470

294709485000

CERTIFIED MAIL®



US POSTAGE
 ZIP 29405 \$009.64
 02 4W
 0000389541 FEB 05 2025

7016 1370 0000 6432 4824


K. Zachry
2/11/25
ins

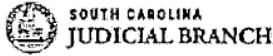
NIXIE 296 DE 1 0002/20/25
 RETURN TO SENDER
 REFUSED
 UNABLE TO FORWARD

BC: 29470559050 *2927-03026-05-40

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS COPY TO POSTAGE

2025CV1011200030

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee
1. Article Addressed to: Teresa K. Zachry 6209 Savannah Hwy. Suite A Ravenel, SC 29470  9590 9402 2327 6225 3294 89	B. Received by (Printed Name) C. Date of Delivery
2. Article Number (Transfer from service label) 7016 1370 0000 6432 4824	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
PS Form 3811, July 2015 PSN 7530-02-000-9053	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Registered Mail <input type="checkbox"/> Mail Restricted Delivery (0) Domestic Return Receipt



STATE OF SOUTH CAROLINA
COUNTY OF Charleston

IN THE COURT OF COMMON PLEAS

Civil Action Coversheet

Teasa Hill
Plaintiff(s) Appellant

v.
Hill Family Trust 2008 (Arizona)
Defendant(s) Respondent

Case No. 2025-CP-10-1379

Submitted By: Teasa Hill
Address: 6309 Savannah Blvd
Rowland, SC 29470

SC Bar Number: 15798
Telephone #: 843 851-2261
Fax #: _____
Other: _____
Email: Zachary Law Firm Epm, me

Hill Family Trust 2008 - Arizona
Verona Herald - 6010 mcdinst Rowland SC

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. **This form is NOT required to be filed in E-Filed Cases.**

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint.
- NON-JURY TRIAL demanded in complaint.
- This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Certificate Attached)

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRPC, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

Submitting Party Signature: [Signature]
Date: 3/13/2025

SCCA 234 (Revised 11/2024)

FILED
2025 MAR 13 PM 4:12
CLERK OF COURT



Nature of Action (Check one box below)

Contracts

- Constructions (100)
- Debt Collection (110)
- General (130)
- Breach of Contract (140)
- Fraud/Bad Faith (150)
- Failure to Deliver/Warranty (160)
- Employment Discrim (170)
- Employment (180)
- Other (199)

Torts- Professional Malpractice

- Dental Malpractice (200)
- Legal Malpractice (210)
- Medical Malpractice (220)
- Notice of Intent Case #

- Notice File. Med Mal (230)
- Other (299)

Torts- Personal Injury

- Conversion (310)
- Motor Vehicle Accident (320)
- Premises Liability (330)
- Products Liability (340)
- Personal Injury (350)
- Wrongful Death (360)
- Assault/Battery (370)
- Slander/Libel (380)
- Other (399)

Inmate Petitions

- PCR (500)
- Mandamus (520)
- Habeas Corpus (530)
- Other (599)

Real Property

- Claim & Delivery (400)
- Condemnation (410)
- Foreclosure (420)
- Mechanic's Lien (430)
- Partition (440)
- Possession (450)
- Building Code Violation (460)
- Other (499)

Judgments/Settlements

- Death Settlement (700)
- Foreign Judgment (710)
- Magistrate's Judgment (720)
- Minor Settlement (730)
- Transcript Judgment (740)
- Lis Pendens (750)
- Transfer of Structured Settlement Application Payment Rights (760)
- Confession of Judgment (770)
- Petition for Workers Compensation Settlement Approval (780)
- Incapacitated Adult Settlement (790)
- Other (799)

Administrative Law/Relief

- Reinstate Driver's License (800)
- Judicial Review (810)
- Relief (820)
- Permanent Injunction (830)
- Forfeiture- Petition (840)
- Forfeiture- Consent Order (850)
- Other (899)

Special/Complex/Other

- Environmental (600)
- Automobile Arb. (610)
- Medical (620)
- Pharmaceuticals (630)
- Unfair Trade Practices (640)
- Out of State Depositions (650)
- Motion to Quash Subpoena in an Out of County Action (660)
- Pre-Suit Discovery (670)
- Permanent Restraining Order (680)
- Interpleader (690)
- Other (699)

Appeals

- Arbitration (900)
- Magistrate- Civil (910)
- Magistrate- Criminal (920)
- Municipal (930)
- Probate Court (940)
- SCDOT (950)
- Worker's Comp (960)
- Zoning Board (970)
- Public Service Comm. (990)
- Employment Service Comm. (991)
- Other (999)



Effective January 1, 2016, Alternative Dispute Resolution (ADR) is mandatory in all counties, pursuant to Supreme Court Order dated November 12, 2015.

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

Pursuant to the ADR Rules, you are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs.
4. Cases are exempt from ADR under ADR Rule 3(b) upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals;
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. Cases may also be exempt from ADR under ADR Rule 3(c) upon motion to and approval by the court.
6. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
7. Application of a party to be exempt from payment of neutral fees due to indigency should be filed with the Clerk of Court prior to the scheduling of the ADR conference.

Please Note: You must comply with the Supreme Court Rules regarding ADR.

SCCA 234 (Revised 11/2024)



Failure to do so may affect your case or may result in sanctions.

)	<u>2025-CP-10-1379</u>
)	COMMON PLEAS CASE NUMBER
STATE OF SOUTH CAROLINA)	
)	2025cv1011200030
COUNTY OF CHARLESTON)	MAGISTRATE CIVIL CASE NUMBER
)	
TERESA ZACHRY HILL)	
)	IN THE COURT OF COMMON PLEAS
APPELLANT(S))	
)	
VS.)	NOTICE OF CIVIL APPEAL
)	
HILL FAMILY TRUST 2008 of ARIZONA)	
)	
RESPONDENT(S))	

The defendant Teresa Zachry Hill hereby gives notice of appeal from the judgment of the magistrate's court in the above action, to the Circuit Court of Common Pleas, in the County of Charleston.

This notice of appeal is made subsequent to personal notice of the judgment, which was received left on my office door at 6209 Savannah Hwy., Ravenel, South Carolina on the 12 day of March, 2025.

The appellant's exceptions to the judgment of the magistrate are set forth as follows: Appellant was not served with the pleadings in this matter. The Magistrate's Court lacks jurisdiction of this matter. The matter was filed under the South Carolina Landlord-Tenant Act. Appellant is not a tenant. Appellant is an owner. Appellant has never been a tenant and therefore not subject to the South Carolina Landlord-Tenant Act.

Appellant request that the wrongful writ of ejection issued by Ravenel Magistrate Sheryl Perry be stayed pending the appeals process.

(SIGNATURE PAGE TO FOLLOW)

FILED
 2025 MAR 13 PM 4:12
 CLERK OF COURT

S/Teresa Zachry Hill

Teresa Zachry Hill, Esquire
SC 15792

6209 Savannah Highway

P.O. Box 369

Ravenel, SC 29470

(843) 889-2261 – Telephone

(843) 889-2262 – Telephone

ZachryHillFirm@pm.me

SCCA/720 (Amended 8/1/2011)

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
)
) **CERTIFICATE OF TECHNICAL FAILURE**
) **OR TECHNICAL DIFFICULTIES**
 TERESA HILL)
) Plaintiff)
 vs.)
) Case No.:
 HILL FAMILY TRUST 2008 (ARIZONA))
) Defendant.)

2025 MAR 13 PM 4:12
 COURT REPORTER
 HILL

Pursuant to the *South Carolina Electronic Filing Policies and Guidelines*, TERESA HILL, Attorney for the plaintiff(s)/defendant(s), seeks to file the attached NOTICE OF CIVIL APPEAL by a Traditional Filing Method/Alternative Method of Submission based on the inability to Electronically File the document. The inability to Electronically File the document was caused by:

- An announced Technical Failure of the Electronic Filing System;
- A technical difficulty that prevented the successful E-Filing of this document, which is described in detail below, including a statement certifying compliance with Section 9(d) of the Policies and Guidelines;
- A Repeated Technical Difficulty, which is described in detail below, including a statement certifying compliance with Section 9(f) of the Policies and Guidelines;
- ; or
- The document is excluded from the requirement that it be E-Filed in accordance with Section 2(d) of the Policies and Guidelines.

I have served or will serve this notice and the attached NOTICE OF INTENT TO APPEAL on all parties to this action by the following means:

I declare under penalty of perjury that the foregoing is true and correct.
 I attempted to file on March 13, 2025 at Notice of Intent to appeal Charleston County Magistrates Court Case 2025CV1011200030 to the Charleston County Court of Common Pleas. There were multiple attempts to file the Notice of Intent to Appeal each time an error message of 99APCV case subtype initial action required VACT00010JE2jseF_VACT00010 was received. I contacted the Charleston County Court of Common Pleas the clerk there attempted to assist me with the error. She was not able to assist me in completing the filing and provided me information that there is an issue with the filing system. She provided at my request the South Carolina Supreme Court SCCA/293 (8/2016)

support line number of 1-855-235-2500. I called and spoke with a lady who also reported issues with the e-filing system. She did walk me through another attempt to e-file. The result was the same, which was error message of 99APCV case subtype initial action required VACT00010JE2jseF_VACT00010 was received. She then directed me to this report to file with Charleston County.

s/Teresa Zachry Hill

Teresa Zachry Hill, Esquire
SC 15792
6209 Savannah Highway
P.O. Box 369
Ravenel, SC 29470
(843) 889-2261 – Telephone
(843) 889-2262 – Telephone
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SCCA/293 (8/2016)

EXHIBIT D

ELECTRONICALLY FILED - 2025 Jul 29 2:44 PM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379
ELECTRONICALLY FILED - 2025 Aug 07 2:22 PM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379
ELECTRONICALLY FILED - 2026 Jan 29 11:42 AM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON)	NINTH JUDICIAL CIRCUIT
)	CASE NO.: 2025-CP-10-1379
)	
)	
)	RAVENEL MAGISTRATES COURT
HILL FAMILY TRUST 2008 of ARIZONA,)	CASE NO: 2025CV1011200030
and YVONNE HEROLD)	
Plaintiffs,)	NOTICE OF MOTION and
)	MOTION TO RECONSIDER
)	ORDER AFFIRMING
TERESA HILL,)	MAGISTRATE'S COURT
)	EVICITION ORDER
Defendant.)	
_____)	

TO: THE ABOVE-NAMED PLAINTIFFS, HILL FAMILY TRUST 2008 of ARIZONA and YVONNE HEROLD

YOU WILL PLEASE TAKE NOTICE that Defendant, Teresa Hill, will move before the presiding Judge of the Charleston County Court Common Pleas, Charleston, South Carolina, 100 Broad Street, Charleston, South Carolina, 29401, as counsel may be heard, on a motion to reconsider order this court's order affirming the eviction order of Ravenel Magistrates and for an order granting the relief hereinafter set forth.

Defendant, Teresa Hill ("Defendant" or "Teresa Hill"), pro se attorney, and respectfully moves this Honorable Court, pursuant to Rule 59(e) of the South Carolina Rules of Civil Procedure, to reconsider its order issued after the June 26, 2025, virtual hearing, affirming the eviction order issued by Charleston County Ravenel Magistrate Sheryl Perry. In support of this motion, Defendant Teresa Hill states as follows:

GROUND FOR RECONSIDERATION

1. LACK OF STANDING OF PLAINTIFF HILL FAMILY TRUST 2008 OF ARIZONA

- a) Plaintiff, Hill Family Trust 2008 of Arizona ("Plaintiff" or "Trust"), has failed to produce any trust document establishing the existence of Hill Family Trust of Arizona or naming Plaintiff, Yvonne Herold as Trustee.

- b) No trust document was provided by either Plaintiff Hill Family Trust 2008 of Arizona or Yvonne Herold to the Charleston County Ravenel Magistrate Court, the Charleston County Court of Common Pleas, or recorded with the Charleston County Register of Deeds.
- c) The alleged beneficiaries of the Hill Family Trust 2008 of Arizona have not received any trust document, and no such document has been served or filed in these proceedings.
- d) Without evidence of a valid trust, Plaintiff Hill Family Trust 2008 of Arizona lacks standing to bring this eviction action, and the alleged Trustee, Yvonne Herold, lacks authority to act on behalf of the Trust.
- e) The absence of a trust document constitutes a fundamental defect in Plaintiffs' case, warranting reconsideration to correct errors of law and prevent manifest injustice under Rule 59(e), SCRPC and dismissal of the action by the undocumented trust.

2. DEFENDANT'S OWNERSHIP INTEREST AND NON-TENANT STATUS

- a) Defendant, Teresa Hill, is an attorney who, 35 years ago, built and has continuously maintained an ownership interest in the property located at 6209 Savannah Highway, Ravenel, South Carolina, where she practices law and resides.
- b) Defendant, Teresa Hill, has never been a tenant of Hill Family Trust of Arizona or any other person or entity claiming an interest in 6209 Savannah Highway, Ravenel, South Carolina.
- c) Defendant Teresa Hill has never been a tenant of Plaintiff Yvonne Herold or any other entity or individual claiming an interest in 6209 Savannah Highway, Ravenel, South Carolina.
- d) Defendant Teresa Hill moved into the building to work and live on the day she and her law partners completed construction on 6209 Savannah Highway. When

she entered the building 35 years ago it was with the key she entered the building 35 years ago. Teresa Hill has remained there for 35 years without ever entering into a landlord-tenant relationship. She went to the bank to secure the funds when funds were borrowed to pay for the building. She selected the design of the building. The law building is a replica of a building in Mississippi. This building was an investment property Teresa Hill and her law partners. All payments for the building were made from income generated by the law firm Hill, Hill, & Hill and Hill & Hill. In 1990 an agreement was entered into which would transfer 6209 Savannah Highway and the law firm to Teresa Hill and Tommy Hill in the year 2000. Tommy Hill is the same G. Thomas Hill who alleged prepared and notarized a deed which Hill Family Trust 2008 of Arizona and Yvonne Herold (Tommy's Sister) seek to use to evict Teresa Hill from her property at 6209 Savannah Highway.

- e) The eviction proceedings are improperly predicated on a landlord-tenant relationship that does not exist, rendering the eviction order legally erroneous.

3. LACK OF DUE PROCESS

- a) Defendant Teresa Hill was not served with any pleadings related to the eviction action, case number 2025-CV-10-11200030 by the Ravenel Constable, a private process server, or certified mail.
- b) Defendant Teresa Hill was not afforded an opportunity to be heard prior to Charleston County Sheriff's Deputies and the Ravenel Constable forcibly entering her property at 6209 Savannah Highway, causing harm to Defendant.
- c) The failure to provide proper service and an opportunity to be heard violates Defendant's due process rights under the United States Constitution, Amend. XIV, and the South Carolina Constitution, Art. I, § 3. (requiring notice and opportunity to be heard).
- d) These constitutional violations warrant reconsideration to correct fundamental errors in the eviction process.

4. PROCEDURAL IRREGULARITIES IN THE APPELLATE PROCESS

- a) When Defendant Teresa Hill attempted to file this appeal with the South Carolina Courts e-filing system, a system which the Defendant is very familiar with, South Carolina Courts e-filing system which would not accept her e-filing. As the court is aware there is a very short window of time, five (5) days, in which to file an eviction appeal. Defendant Teresa Hill called the ASI filing help line. They were not able to correct the problem. Defendant Teresa Hill called the Charleston County Clerk of Court's office; they were not able to accept a hard copy filing or help. Defendant had to involve the South Carolina Supreme Court. The defendant was directed to make a report of the filing failure and send it to Charleston County at the contact information location designated by Charleston County on the South Carolina Supreme Court website. Charleston County initially agreed to accept an email copy of the appeal. Then Charleston County reversed its decision. Defendant, being a 45-minute drive in good traffic from the courthouse, began driving her appeal. In route to the courthouse, she was calling the Supreme Court and the Charleston County Clerks office about the injustice of an appeal being refused by all court systems and offices on an eviction that was never served on a property owner. As Defendant approached downtown Charleston near the end of the day the Charleston County Clerk's office agreed to accept a hard copy filing of her appeal in case 2025CV1011200030. The appeal was filed by Teresa Hill on March 13, 2025, at 4:12 p.m. at the Charleston County Courthouse.
- b) On March 13, 2025, Defendant Teresa Hill requested the Magistrate's Return from Charleston County Ravenel Magistrate Sheryl Perry's office by two (2) methods via facsimile and United States First Class Mail on March 13, 2025.
- c) One March 14, 2025, when the three Charleston County Deputies and Ravenel Constable forced their way into Teresa Hill's office. They denied knowing of the appeal Defendant Teresa Hill filed. Teresa Hill provided the Charleston County Deputies and the Ravenel Constable with a copy of the filed appeal and a copy of the correspondence sent to Charleston County Magistrate Sheryl M. Perry. She asked them not to come into her office. They did not respect her request. They also left three Charleston County Sheriff's cruisers in her law office parking lot

- with blue lights flashing. The deputies and the constable still forced their way into her office three huge Charleston County Sheriff's deputies cornering her and causing harm to her. As one of the Charleston County Deputies stated in another hearing to a Charleston County Judge, *"She was somehow able to get off an appeal."*
- d) Charleston County Constable Cassie Watson was aware from the day he and the Charleston County Deputies came to evict her on March 14, 2025, that she was never served with any of the pleading in this case before they forced their way into Defendant Teresa Hill's office. Even after the deputies received the stamped filed, dated, and clocked copy of the eviction appeal they still forced their way into her business – more than once on March 14, 2025.
 - e) Despite multiple inquiries by Teresa Hill to the Charleston County Clerk of Court's office regarding the Magistrate's Return of Sheryl Perry, Defendant Teresa Hill did not receive the Magistrate's Return until the day of the appellate hearing, shortly before the appellate hearing on June 26, 2025, when the Magistrates Return was made available online.
 - f) The Charleston County Magistrate's Return was not filed until June 25, 2025, one day before the appellate hearing, depriving Defendant of adequate time to prepare for the appeal. Although it is stamped filed on June 25, 2025, the return was not available to Plaintiff until June 26, 2025, the date of the appellate hearing.
 - g) Plaintiffs' attorneys, Steven Slotchiever and Anna Richter, did not file a Notice of Appearance in the Charleston County Court of Common Pleas appeal case, until the day of the appellate hearing, June 26, 2025, further limiting Defendant's ability to prepare. Defendant Teresa is unaware as to whether they ever filed a notice of appearance in the Magistrates Court Case. A notice of appearance is not listed in Charleston County Magistrate Sheryl Perry's return.
 - h) Defendant Teresa Hill, a self-represented attorney, did not receive email notifications from the Charleston County Court of Common Pleas regarding filings in this case, despite initiating the appeal and being entitled to such notifications under Rule 5, SCRPC. At all times her email address was available

to the Charleston County Clerks office, listed in the e-filing system and listed in the pleadings along with her South Carolina Bar number and contact information.

- i) These procedural deficiencies prejudiced Defendant's ability to effectively present her appeal, warranting reconsideration.
- j) Defendant Teresa learned of the Court's order affirming the eviction only on July 28, 2025, via the Charleston County Court of Common Pleas online portal. No email notification of the filing was received.
- k) The lack of direct notification via email to Defendant (attorney) who initiated the appeal and whose email was not only provided but was in the system further underscores the highly unusual number of procedural irregularities in this case jeopardizing due process.

5. ALLEGATION OF FRAUD IN THE DEED

- a) The alleged deed placing the property at 6209 Savannah Highway into the Hill Family Trust 2008 of Arizona which present by the alleged Trustee Yvone Herold at the appeal and relied upon by Plaintiff, was purportedly signed in 2008, was not filed with the Charleston County Register of Deeds until 2023.
- b) The fifteen (15) year delay in filing the deed raises serious concerns about its authenticity and validity, suggesting potential fraud, misrepresentation, capacity of the signers and witnesses, and undue influence by Plaintiff or its agents.
- c) The alleged deed transferring the property to a trust was not filed until one of the alleged signers was dead and the other alleged signer was severely incapacitated with Alzheimer disease.

- d) The failure to timely file the alleged deed deprived Defendant Teresa Hill of notice of any claimed transfer of property interest, undermining the legitimacy of Plaintiffs' claim to ownership and its basis for initiating eviction proceedings.
- e) This apparent fraud, undue influence, capacity of the signor constitutes a material defect in Plaintiffs' case, further warranting reconsideration of the Court's order affirming the eviction.
- f) The Plaintiffs' actions in presenting a potentially fraudulent deed constitute a deliberate misrepresentation of material facts, relied upon by the Court in affirming the eviction order, which the Defendant seeks to challenge.

6. EQUITABLE ESTOPPEL

- a) Defendant relied on representations and conduct by business partners, law partners, Plaintiffs, Plaintiffs predecessors, its agents, or related non-parties, including business partners and law firms, that affirmed her ownership interest and right to occupy the property at 6209 Savannah Highway, Ravenel, South Carolina.
- b) Over the course of 35 years, Plaintiffs or its predecessors, business partners, law partners, Plaintiffs, Plaintiffs predecessors, its agents, or related non-parties, including business partners and law firms, knowingly permitted Defendant to maintain her residence and law practice on the property knowing that she believed that she was an owner without asserting any claim of a landlord-tenant relationship or challenging her ownership interest. Plaintiffs or their predecessors continued to have Defendant work to pay for a property as agreed upon.
- c) Defendant reasonably relied on these and many other representations and Plaintiffs', business partners, law partners, Plaintiffs, Plaintiffs predecessors, its agents, or related non-parties, including business partners and law firms, inaction to her detriment, substantial monetary investment, investing significant

time, resources, and effort into paying for, maintaining and improving the property under the belief that her ownership interest was secure.

- d) Plaintiffs are equitably estopped from now asserting a landlord-tenant relationship or pursuing eviction, as such action contradicts the prior representations and conduct upon which Defendant relied to her detriment.
- e) Allowing the subject eviction would result in manifest injustice, warranting reconsideration under Rule 59(e), SCRPC and dismissal of the eviction.

7. RELIANCE ON AGREEMENTS WITH NON-PARTY BUSINESS PARTNERS AND LAW FIRMS WHO WERE NOT NAMED IN THIS LAWSUIT

- a) Defendant Teresa Hill entered into agreements with business partners and law firms, who are not parties to this action, one of which allegedly drafted the deed transferring the property into the alleged Trust which was signed by the other law partner. Hill and Hill, LLC and Hill, Hill and Hill, LLC are proper parties to this action and have not been noticed or served. Hill, Hill and Hill, LLC and Hill and Hill, LLC have potential ownership interest and use interest along with Teresa Hill who was a partner in both of those law firms. The ownership interest in and use of the property at 6209 Savannah Highway, Ravenel, South Carolina properly involves Teresa Hill, Hill, Hill, and Hill and Hill and Hill and other potential heirs.
- b) Defendant Teresa Hill relied on representations made by these business partners and law firms in maintaining her ownership interest and continued use of the property for her law practice and residence since 1990.
- c) The eviction action fails to account for these potential ownership interest in the building and real property, agreements, representations and fails to name all interested parties to the action which should receive notice of this litigation which establish Defendant's equitable rights to the property and ownership interest. This is not a case involving a tenant. This is not an eviction case, this is a real property title dispute. Defendant Teresa Hill claims ownership of the property. Never has she ever entered into a rental agreement. Never has she ever been given permission to occupy the property because she is an owner.

- d) These equitable considerations, including Defendant's detrimental reliance on the representations of non-parties, warrant review in a court of equity to prevent manifest injustice.

8. FAILURE TO NOTIFY ALL PROPER PARTIES, BENEFICIARIES, AND ESTATES

- a) Plaintiff not only failed to provide notice of the legal pleadings and action to Defendant Teresa Hill, but Plaintiff also failed to properly name and serve prior law firms that represented or had agreements with Defendant concerning the property at 6209 Savannah Highway, Ravenel, South Carolina, despite their potential interest in the property or related agreements.
- b) The alleged beneficiaries, of the Hill Family Trust 2008 of Arizona, have never been notified of the existence of a trust or properly notified of this action, nor have the trust beneficiaries ever been provided with any trust documentation, further undermining the legitimacy of Plaintiffs' claims and the eviction proceedings. If there is a Trust the alleged Trustee has breached her fiduciary duties to the alleged beneficiaries by failing to provide the beneficiaries notification of the alleged trust.
- c) There are also certain estates, with potential interests in the property, which estate(s) should have been named as parties to this action due to their involvement in the chain of title or related agreements, were not included or notified, rendering the eviction proceedings defective.
- d) The omission of these beneficiaries and proper notice constitutes a procedural and substantive defect, as their absence prevents a complete and equitable resolution of the dispute.

9. OWNERSHIP INTEREST OF PRIOR LAW FIRMS

- a) In the alternative, prior law firms, specifically Hill, Hill & Hill and Hill & Hill that entered into agreements with Defendant Teresa Hill regarding the property

at 6209 Savannah Highway, Ravenel, South Carolina, hold an ownership interest in the property based on those agreements.

- b) These law firms, as non-parties to the eviction action, were not notified of the proceedings, despite their potential ownership interests, which further invalidates the eviction process.
- c) The failure to include these law firms as necessary parties with potential ownership interests constitutes a procedural defect and a violation of due process.

10. CONSTRUCTIVE TRUST INTEREST AND UNJUST ENRICHMENT

- a) In the alternative, if Defendant Teresa Hill is not deemed an owner of the property at 6209 Savannah Highway, Ravenel, South Carolina, she holds a constructive trust interest in the property due to her significant contributions and 35-year reliance on representations regarding her rights to the property.
- b) Over the course of 35 years, Defendant invested substantial time, money, and effort into building, maintaining, and improving the property, including constructing the building, maintaining it as her residence and law practice, and making ongoing improvements, all under the reasonable belief, based on representations by non-parties and Plaintiffs' predecessors, that she held a secure interest in the property.
- c) Allowing Plaintiffs to evict Defendant and claim full ownership of the property, while retaining the benefit of Defendant's extensive contributions without compensation, would result in unjust enrichment to Plaintiffs at Defendant's expense.
- d) Plaintiffs' attempt to leverage an allegedly fraudulent deed, filed 15 years after its purported execution, to dispossess Defendant of her office/home and livelihood constitutes an egregious inequity. Defendant's contributions, including her financial investment, labor, and 35 years of continuous occupancy, have

significantly enhanced the value of the property, and Plaintiff would be unjustly enriched by retaining these benefits without acknowledging Defendant's equitable interest. The building and law practice the nonlawyers are attempting to sale would not even exist without the 35 years of work and investment of Teresa Hill.

- e) A constructive trust must be imposed to prevent this unjust enrichment, recognizing Defendant's equitable interest in the property and ensuring that Plaintiffs do not profit from Defendant's 35 years of contributions while disregarding her rights. The imposition of a constructive trust is necessary to prevent manifest injustice, as it would be unconscionable to allow Plaintiff to reap the benefits of Defendant's decades-long investment in the property while evicting her based on a questionable trusts claim to ownership by a deed filed when one of the signers was dead and the other signer was severely incapacitated.

11. AGREEMENT AND EQUITABLE TRUST DUE TO FRAUDULENT TRANSFER

- a) Defendant entered into an agreement with business partners and law firms, under which she fulfilled her obligations, including building, paying for, contributing to and maintaining the property at 6209 Savannah Highway, Ravenel, South Carolina, for 35 years as an office, residence, and law practice.
- b) Plaintiffs, its agents, or predecessors failed to inform the Defendant of the alleged fraudulent transfer of the property, as evidenced by the 15-year delay in filing the 2008 deed with the Charleston County Register of Deeds.
- c) By not disclosing the purported transfer, Plaintiffs or its predecessors breached their duty to Defendant, who relied on the agreement and representations to her detriment, believing her interest in the property was secure.
- d) This breach and the fraudulent concealment of the transfer establish an equitable trust for Defendant's benefit, as it would be unconscionable to allow Plaintiff to evict her and deprive her of her interest in the property due to their misconduct.

- e) The equitable trust arises from Plaintiffs' failure to notify Defendant of the alleged transfer, which prevented her from taking action to protect her interest, further supporting the imposition of an equitable trust to safeguard Defendant's rights.

12. UNJUST ENRICHMENT THROUGH PLAINTIFFS' INEQUITABLE CONDUCT

- a) Plaintiffs' pursuit of eviction based on a potentially fraudulent deed, coupled with its failure to acknowledge Defendant's 35 years of contributions to the property, law firm and business constitutes a clear case of unjust enrichment.
- b) Defendant's substantial investments in the property, including her financial and personal contributions to its construction, forgoing substantial income, ongoing maintenance, and improvements, have directly benefited Plaintiff or its fraudulent predecessors, who now seek to retain these benefits without compensating Defendant or recognizing her equitable interest.
- a) Defendant lived in the attic of the office building for more than 10 years so that financial sacrifices and work contributions could be made to support the building of this office building. As evidence of the time in the attic of the building, the children's growth charts and names are etched upon the walls. The children's crayon drawings are on the walls. The hallway of the office was used as a hockey and batting cage. The children all toddled around this office while Defendant worked. They all honed their business and legal skills working on computers and greeting clients while Momma worked. The contributions, forgoing bonuses, extra coverage, more complex cases, and many sacrifices beyond the monetary realm were part of the agreement in paying that was only to last for a specified period of time which has been far exceeded by Defendant Teresa Hill. All four of her children were brought home from the hospital to 6209 Savannah Highway; those children are now all over the age of 30 years of age. Those children who were raised in the attic of their mother's law building. They were raised there as part of an agreement of contribution and sacrifice made for ownership in the law business and law building. *Now Hill Family Trust 2008 of*

Arizona seeks to not only sell Teresa Hill's building but are by selling the building also selling her law practice of 35 years.

- c) For 35 years, Plaintiff or its predecessors acquiesced to Defendant's occupancy and improvements, never asserting a landlord-tenant relationship or challenging her claimed ownership interest. Defendant Teresa Hill has never been a tenant she has always acted with ownership authority. This prolonged acquiescence, followed by an attempt to evict her based on a fraudulent deed presented during incapacity and during undue influence, represents an attempt to unjustly enrich Plaintiff Hill Family Trust 2008 of Arizona by exploiting Defendant's 35 years contributions.
- d) The alleged fraudulent deed, filed seventeen (17) years after its purported execution, further exacerbates the inequity, as Plaintiff seeks to profit from a potentially invalid transfer while ignoring Defendant's detrimental reliance on representations that her interest in the property was secure. *S.C. Code Ann. § 30-7-10.e.* Permitting Plaintiff to evict Defendant Teresa Hill, a non-tenant property owner, without addressing her contributions and the fraudulent circumstances surrounding the deed would reward Plaintiff Hill Family Trust 2008 of Arizona's inequitable conduct and unjustly deprive Defendant Teresa Hill of her home, livelihood, and the value she added to the property over three and a half decades.
- e) This Court must intervene to prevent such unjust enrichment, either by imposing a constructive or equitable trust or by dismissing the action on the eviction to ensure that Plaintiff Hill Family Trust 2008 of Arizona does not benefit at Defendant's expense, thereby correcting a manifest injustice.

13. ADVERSE POSSESSION

- a) In the alternative, Defendant has acquired title to the property at 6209 Savannah Highway, Ravenel, South Carolina, through adverse possession under South Carolina law.

- b) Defendant has openly, notoriously, continuously, exclusively, and adversely possessed the property for 35 years, exceeding the agreed upon period between the business partners and then the statutory period of 10 years required for adverse possession.
- c) Defendant's possession began when she moved into the property upon completion of its construction 35 years ago, openly using it as a place of business, her residence and law practice without permission from any alleged owner, including Plaintiff or its predecessors.
- d) Defendant Teresa Hill's possession of the building has been hostile, as she claimed ownership interest in the property and made substantial improvements, including constructing the building and maintaining it, without acknowledging any superior title in Plaintiff or its predecessors.
- e) Plaintiffs or its predecessors failed to assert any claim to the property or challenge Defendant's possession for 35 years, allowing her to maintain exclusive control and make significant investments in the property, further supporting her adverse possession claim.
- f) The alleged deed, filed in 2023 and purportedly signed in 2008, does not defeat Defendant's adverse possession claim, as her possession predates the alleged transfer and continued openly and notoriously thereafter, without interruption or challenge from Plaintiff or its predecessors.
- g) Defendant's adverse possession establishes her legal title to the property, rendering the eviction action invalid and warranting reconsideration of the Court's order affirming the eviction.

14. MAJISTRATES COURTS LACK OF JURISDICTION

- a) The Charleston County Ravenel Magistrate Court lacked jurisdiction over this eviction action because it was improperly initiated under the South Carolina Landlord and Tenant Act which governs disputes between landlords and tenants.
- b) Defendant is neither now nor has she ever been a tenant of Hill Family Trust 2008 of Arizona or any other person or entity, as she has maintained an ownership interest in the property at 6209 Savannah Highway, Ravenel, South Carolina, for 35 years, having built and occupied the property as her business asset without a rental agreement.
- c) The absence of a landlord-tenant relationship deprives the magistrate court of jurisdiction, as its authority in eviction actions is limited to cases involving tenants. Defendant is not a tenant. She has never been a tenant.
- d) The magistrate court lacked jurisdiction to determine title to real property or legal interests in real estate, as this case involves a dispute over Defendant's claimed ownership interest, adverse possession, and equitable interests, which are matters reserved for courts of general jurisdiction, such as the Court of Common Pleas.
- e) Additionally, the matter in controversy exceeds the magistrate court's jurisdictional limit of \$7,500, as the value of the property at 6209 Savannah Highway, Ravenel, South Carolina, and the equitable interests at stake, including Defendant's 35 years of contributions, far surpass this threshold.
- f) The magistrate court's assumption of jurisdiction over this matter, despite the lack of a landlord-tenant relationship, the need to determine title and legal interests in real property, and the amount in controversy exceeding \$7,500, constitutes a fundamental error of law, rendering the eviction order void and necessitating reconsideration under Rule 59(e), SCRCF, to correct this jurisdictional defect.

LEGAL STANDARD

Under Rule 59(e), SCRCPP, a motion to alter or amend a judgment may be granted to correct errors of law, prevent manifest injustice, or address newly discovered evidence. The grounds outlined above, supported by South Carolina case law and statutes, demonstrate clear errors of law, violations of due process, procedural irregularities, potential fraud, and equitable considerations that prejudiced Defendant's rights and the rights of others and warrant reconsideration of the Court's order.

PRAYER FOR RELIEF

WHEREFORE, Defendant Teresa Hill respectfully requests that this Honorable Court:

1. Grant this Motion to Reconsider pursuant to Rule 59(e), SCRCPP;
2. Vacate the order issued on or about June 26, 2025, affirming the eviction order;
3. Dismiss the eviction action for lack of standing, lack of jurisdiction, improper predicate, due process violations, fraud in the deed, equitable estoppel, failure to join necessary parties, ownership interests of prior law firms, constructive trust, equitable trust, unjust enrichment, adverse possession, and/or equitable considerations.
4. In the alternative, remand the case to the Charleston County the Master in Equity for further proceedings consistent with due process, proper documentation, investigation of the alleged fraud, inclusion of all necessary parties, and consideration of Defendant's equitable claims, including constructive and equitable trust interests and adverse possession, in a court of equity for further determination.

S/ Teresa Hill

Teresa Hill, Esquire
6209 Savannah Hwy.
Post Office Box 369
Ravenel, SC 29470
(843)889-2262
(843)889-2261
SC 15792
HillLawFirm@pm.me



Charleston Common Pleas

Case Caption: Teresa Zachry Hill VS Hill Family Trust 2008 of Arizona
Case Number: 2025CP1001379
Type: Motion/Alter and/or Amend

AND THIS ORDER IS RESPECTFULLY
DENIED.

s/Maite Murphy 2166

Electronically signed on 2025-08-07 13:16:23 page 17 of 17

ELECTRONICALLY FILED - 2025 Aug 07 2:22 PM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379
ELECTRONICALLY FILED - 2026 Jan 29 11:42 AM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379

SLOTCHIVER & SLOTCHIVER, L.L.P.

ATTORNEYS AT LAW

EST. 1959

751 JOHNNIE DODDS BLVD, SUITE 100
MOUNT PLEASANT, SC 29464

TELEPHONE (843) 577-6531
FACSIMILE (843) 577-0261

IRVIN J. SLOTCHIVER (1959 – January 2023)
DANIEL S. SLOTCHIVER
STEPHEN M. SLOTCHIVER

ANNA E. RICHTER
DENA BYRUM

December 15, 2025

VIA US MAIL

Teresa Hill AKA Teresa Zachry
6209 Savannah Highway
Ravenel, SC 29407-5528

RE: Hill Family 2008 Trust and Yvonne Herold, Trustee v Teresa K. Zachry fka
Teresa Z. Hill
Case No: 2025-CP-10-1379

Dear Teresa,

We would like to inspect the building located at 6209 Savannah Highway. Please let us hear from you by December 30, 2025 to schedule a time that is mutually convenient.

Sincerely,



Anna E. Richter

cc: Dan Slotchiver, Esq. (via email only)
Jesse Sanchez, Esq. (via email only)

EXHIBIT F



Anna Richter <arichter@slotchiverlaw.com>

Christmas/New Year Holiday Demand Letter Hill Family Trust of Arizona

Teresa Hill <HillLawFirm@pm.me>

Tue, Dec 30, 2025 at 5:00 PM

To: dan@slotchiverlaw.com, arichter@slotchiverlaw.com, jesse@jessesanchezlaw.com

Cc: "teresa@hilllaw.attorney" <teresa@hilllaw.attorney>, attorneyhill@pm.me

All:

Your recent correspondence, mailed to me mere days before Christmas and brazenly demanding entry into my building, business, and personal residence by December 30th, stands as an unparalleled low point in the practice of law and life—particularly among fellow attorneys sent on behalf of family during the holiday season. It mirrors the conduct of a highly unconscionable attorney, reeking of shameless opportunism, profoundly unprofessional, utterly devoid of conscience, and completely bereft of even the most basic civility, as if the spirit of the season and the people involved were nothing more than an inconvenient footnote to your aggressive tactics.

Let me be unequivocally clear: **Neither you nor your clients will set foot in my building, my business, or my home.** Your clients have not darkened the door of my office in decades, and they are most assuredly not welcome to do so now—or ever—in their transparent bid to usurp the enterprise and property I have built over 35 years. Such presumptuous overreach will not be tolerated.

Teresa Hill
Hill Law Firm
Post Office Box 369
6209 Savannah Hwy.
Ravenel, SC 29470
(843)889-2261 - Telephone
(843) 889-2262 - Telephone
"A Powerful Voice for Positive Change"

ELECTRONICALLY FILED - 2026 Jan 29 11:42 AM - CHARLESTON - COMMON PLEAS - CASE#2025CP1001379



BP1204792

PGS:

7

STATE OF SOUTH CAROLINA,
COUNTY OF CHARLESTON,

QUIT-CLAIM DEED
(TITLE NOT EXAMINED)

KNOW ALL MEN BY THESE PRESENTS, W. McAlister Hill aka W. M. Hill aka William M. Hill aka William McAlister Hill and Mable T. Hill whether singular or plural hereinafter referred to as Grantor) in the State aforesaid, for an in consideration of the sum of Five and 00/100 (\$5.00) Dollar, love and affection to Grantor in hand paid at and before the sealing of these presents by Grantee in the State aforesaid, the receipt of whereof is hereby acknowledged, have quit-claimed, granted, bargained, sold and released, and by these presents do quit-claim, grant, bargain, sell and release all of Grantor's interest in the below described property unto, Yvonne H, Herold, as Trustee of the Hill Family 2008 Trust, its/her successors and assigns, the following described property:

Schedule A----Legal Description

Grantee's Address: 6010 Martin Street, Ravenel SC 29470

TOGETHER with all and singular the rights, members, hereditaments and appurtenances to the said premises belonging, or in anywise incident or appertaining.

TO HAVE AND TO HOLD, all and singular, the said Premises before mentioned Yvonne H, Herold, as Trustee of the Hill Family 2008 Trust, its/her successors and assigns, forever.

WITNESS the hand(s) and seal(s) of the Grantor this 8th day of August, in the year of our Lord two thousand eight.

Signed, Sealed and Delivered
in the Presence of

James R. Rodgers
Witness A

W. McAlister Hill
W. McALISTER HILL

W. M. Hill
W. M. HILL

William McAlister Hill
WILLIAM McALISTER HILL

J. Thomas Hill
Witness B

William M Hill
WILLIAM M. HILL

Mable T. Hill
MABLE T. HILL

STATE OF SOUTH CAROLINA,

ACKNOWLEDGMENT

COUNTY OF CHARLESTON,

The foregoing instrument was acknowledged before me this 8th day of October, 2008, at W. McALISTER HILL aka W. M. HILL aka WILLIAM McALISTER HILL aka WILLIAM M. HILL and MABLE T. HILL, who is/are personally known to me, or who were proved to me on the basis of satisfactory evidence to be the persons who executed the foregoing instrument.

J. Thomas Hill (Seal)
NOTARY PUBLIC FOR SC
My Commission Expires: 9/10/08

SCHEDULE A

ALL that certain lot, piece, or parcel of land containing 2.84 acres, situate, lying and being in St. Pauls Parish, Charleston County, SC, near Ravenel and being more fully shown and designated as Lot 1 on a plat by W.L. Gaillard surveyed July 23, 1970, entitled "PLAT OF PROPERTY SITUATE IN ST. PAULS PARISH CHARLESTON COUNTY, SC OWNED BY ESTATE OF CLARA HUDSON DIVIDED INTO LOTS 1 AND 2 - LOT 1 ABOUT TO BE CONVEYED TO EILEEN A. POWELL LOT E ABOUT TO BE CONVEYED TO MADELYN H. DRAWDY" which was attached to and made a part of the deed of conveyance from Madelyn H. Drawdy to Eileen A. Powell.

SAID lot has such size, shape, dimensions, buttings and boundings as will more fully appear by reference to said plat.

BEING the same premises conveyed to MABLE T. HILL and W. McALISTER HILL by deed of EILEEN S. POWELL dated February 4, 1987 and recorded in the RMC Office for Charleston County in Book B162 at Page 385 on February 10, 1987.

TMS#: 187-00-00-114

ALSO:

ALL that certain piece, parcel or tract of land, situate, lying and being in the Town of Ravenel, Charleston County, South Carolina.

MEASURING AND CONTAINING: Ninety-nine Hundredths (.99) of an acre composed of Lot Nos. 145 and 120 on a Plat by J.A. Schmidt, L.S. dated July 7th, 1967 and representing a part of the property conveyed to Mrs. Marion Beach Wilson to Walter M. Hill by conveyance recorded in the R.M.C. Office for Charleston County in Book D-41 at Page 483.

BUTTING AND BOUNDING: Lot No. 145 bounded on the North by Robinson Street; on the East by property of the REformed Methodist Church; on the South by Lot 120 and on the West by Lot No. 146. Lot No. 120 is bounded on the North by Lot 145; on the East by the home place of William M. Hill; on the South by Martin Street and on the West by Lot No. 119.

BEING the same premises conveyed to William McAlister Hill and Mable T. Hill by deed from William M. Hill dated February 6, 1984, recorded in the R.M.C. Office for Charleston County in Book X134 at page 376 on February 7, 1984.

TMS#: 187-00-00-179

ALSO:

ALL that certain piece, part or parcel or lot of land, commonly known as Lot No. 121 of the Town of Ravenel, the same being situated in St. Pauls School District No 23, County of Charleston, State of South Carolina, containing one-half (½) acre, more or less.

SAID lot of land is approximately rectangular in shape and contains the following measurement, butting and boundaries; Beginning at a point which is the south east corner of a tract of land formerly owned and occupied by Walter M. Hill; running thence northwardly for a distance of two hundred and ten (210') feet to the north west corner; running thence eastwardly for a distance of one hundred and five (105') feet to the north east corner; running thence southwardly for a distance of two hundred and ten (210') feet to the south east corner; and running thence westwardly for a distance of one hundred and five (105') feet to the south west corner which is the point of beginning. Bounded on the north by lots formerly owned by the Reformed Methodist Church; East by Lot No. 122 of the Town of Ravenel, which was conveyed to Walter M. Hill, along with the lot herein conveyed, and on the West by lands formerly owned by Walter M. Hill.

BEING the same premises conveyed to William McAlister Hill and Mable T. Hill by deed of William M. Hill dated February 6, 1984 and recorded in the R.M.C. Office for Charleston County in Book X134 at page 372 on February 7, 1984.

TMS#: 187-00-00-217

ALSO:

ALL THOSE CERTAIN LOTS, pieces, parcels or tracts of land known as Lots 143 and 144, situate, lying and being in the Saint Pauls Parish, Town of Ravenel, Charleston County, (formerly Colleton County) in the State of South Carolina, containing one (1) acre, more or less.

BOUNDED on the North by Robertson Street; on the East by Sebring Street; on the South by Lots 121 and 122 owned by Memorial Baptist Church and William M. Hill; and on the West by Lot 145 owned by William M. Hill.

Said property is more fully described on Plat of Ravenel Village, drawn from a survey made by D.W. Mellard, L.S., dated July 1, 1859, A.D.

BEING the same property conveyed to W. McAlister Hill and Mable T. Hill by deed of Walter M. Hill dated and recorded in the R.M.C. Office for Charleston County in Book C109 at page 368 on April 9, 1976.

TMS#: 187-00-00-230

ALSO:

ALL that certain piece, parcel or lot of land situate, lying and being in St. Pauls Parish, County of Charleston, State of South Carolina shown as **LOT "1-A" containing Three and Ninety Eight Hundredths (3.98) acres, more or less, as shown and designated on a plat entitled "PLAT SHOWING THE SUBDIVISION OF EXISTING LOT 1 INTO LOTS 1-A AND LOT-B, LOCATED IN ST. PAULS PARISH, CHARLESTON COUNTY, SC"** dated March 9, 2006 and recorded in the Charleston County RMC Office in Plat Book EJ at page 589 on March 10, 2006.

HAVING such size, shape, metes, butting and bounding as will appear by reference to above plat.

BEING the same property conveyed to William McAlister Hill and Mable T. Hill by deed of Roy H. Tumbleston dated March 30, 2006 and recorded in the Charleston County RMC Office in Book R578 at page 825 on April 5, 2006.

TMS#: 169-00-00-060

STATE OF SOUTH CAROLINA)
)
COUNTY OF Charleston)

AFFIDAVIT

Closing Date:

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this Affidavit and I understand such information.
2. The Property is being transferred byn. W. McAlister Hill aka W. M. Hill aka William M. Hill aka William McAlister Hill and Mable T. Hill to Yvonne H. Herold as the Trustee of the Hill Family 2008 Trust.
3. Check one of the following: The DEED is:
 - (a) subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 - (b) _____ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
 - (c) EXEMPT from the deed recording fee because Exemption No. 8 Explanation, if required: _____
(If exempt, please skip items 4-7, and go to item 7 of this affidavit). To Relatives
4. Check one of the following if either item 3(a) or item 3(b) has been checked.
 - (a) The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$ _____
 - (b) _____ The fee is computed on the fair market value of the realty which is \$ _____.
 - (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is \$ _____.
5. Check YES _____ or NO _____ to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement or realty after the transfer. If "Yes", the amount of the outstanding balance of this lien or encumbrance is \$ _____.
6. The Deed recording fee is computed as follows:
 - (a) \$ 0.00 the amount listed in item 4 above.
 - (b) \$ 0.00 the amount listed in Item 5 above (no amount place zero).
 - (c) \$ 0.00 Subtract Line 6(b) from Line 6(a) and place the result.
7. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with this transaction as :**attorney**
8. The total amount of recording fees **equals**
9. DEED OF DISTRIBUTION - ATTORNEY'S AFFIDAVIT: Estate of _____, deceased, CASE NUMBER: _____. Personally appeared before me the undersigned attorney who, being duly sworn, certifies that (s)he is licensed to practice law in the State of South Carolina; that (s)he has prepared the Deed of Distribution for the Personal Representative in this Estate and that the grantee(s) therein are correct and conform to the estate file for the above named decedent.

I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

By W. M. Hill
W. M. HILL

SWORN to this 8 day of August, 2008

[Signature]
Notary Public for SOUTH CAROLINA
My Commission Expires: 9/10/08

(SEAL)

RECORDER'S PAGE



NOTE: This page **MUST** remain with the original document
deed Affidavit page came in stained

Filed By:

MABLE T. HILL
 PO BOX 134
 RAVENEL, SC 29470

RECORDED		
Date:	September 25, 2023	
Time:	10:50:16 AM	
<u>Book</u>	<u>Page</u>	<u>DocType</u>
1204	792	Q/Claim
Karen Hollings, Register of Deeds Charleston County, SC		

MAKER:

HILL W MCALISTER AL

Note:

of Pages:

RECIPIENT:

HEROLD YVONNE H TR AL

Recording Fee	\$ 15.00
State Fee	<EXEMPT>
County Fee	<EXEMPT>
Extra Pages	\$ -
Postage	\$ 1.00
Chattel	\$ -
TOTAL	\$ 16.00

Original Book:

Original Page:

DRAWER
CLERK

AUDITOR STAMP HERE
 RECEIVED From ROD
 Sep 29, 2023
 Peter J. Tecklenburg
 Charleston County Auditor

PID VERIFIED BY ASSESSOR
 REP LMC
 DATE 09/29/2023



1204
Book



792
Page



09/25/2023
Recorded Date



7
Pgs



Original Book



Original Page



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Recorded Time

Exhibit I

STATE OF SOUTH CAROLINA
 COUNTY OF Charleston

IN THE FAMILY COURT OF THE
9th JUDICIAL CIRCUIT

FILED

2023 DEC 13 AM 9:28

FINANCIAL DECLARATION
 OF Teresa Zachry Hill

Teresa Z. Hill
 vs.
George Tommy Hill

JULIE J. ARMSTRONG
 CLERK OF COURT
 BY _____

Docket No. 2023-DR-10-1283

HUSBAND/FATHER		WIFE/MOTHER	
Address		Address	<u>P.O. Box 369</u>
Age		Age	<u>59</u>
Occupation		Occupation	<u>Attorney</u>
Employer		Employer	<u>Hill Hill DBA Hill Law Firm</u>
Employer Address		Employer Address	<u>6200 Seward Blvd Ravenel, SC 29470</u>

Gross Monthly Income	Husband/Father	Wife/Mother
Principal Earnings from Employment ¹		<u>8,194.75</u>
Overtime, Tips, Commission, Bonuses ²		<u>-0-</u>
Pensions, Retirement, and Annuities income		<u>-0-</u>
Additional Employment income		<u>-0-</u>
Social Security Benefits (SSA) and VA Benefits		<u>-0-</u>
Disability and Worker's Compensation Benefits		<u>-0-</u>
Unemployment and AFDC		<u>-0-</u>
Spousal or Child Support (from other marriage/relationship)		<u>-0-</u>
Dividends, Interest, Trust Income, and Capital Gains		<u>-0-</u>
Rental Income and Business Profits		<u>-0-</u>
Other (Specify):		<u>-0-</u>
TOTAL GROSS MONTHLY INCOME		<u>8,194.75</u>

Payroll Deductions from Monthly Income	Husband/Father	Wife/Mother
Federal Income Tax ³		
State Income Tax		
Social Security and Medicare Tax (FICA)		
Self-Employment Tax		
Health and Dental Insurance (Adult)		
Health and Dental Insurance (Child)		
Union Dues		
Voluntary Retirement Contribution (401(k), 457, IRA)		
Mandatory Retirement Contribution		
Savings Plan		
Other (Specify):		
TOTAL MONTHLY DEDUCTIONS		
NET MONTHLY INCOME ⁴		

Estimate monthly expenses: (Specify which party is the custodial parent and list name and relationship of all members of household whose expenses are included. _____)

MONTHLY EXPENSES ⁵	Husband/Father	Wife/Mother
Residential Rent Payment		2000.00
Note or Mortgage Payment on Residence(s)		
Food and Household Supplies ⁶		250.00
Utilities, Water, and Garbage Collection		200.00
Telephone and Cellular Phone		175.00
Medical, Dental and Disability Insurance Premiums (not deducted from paycheck)		900.00
Life Insurance Premiums (not deducted from paycheck)		0.00
Child Support (from other relationship)		0.00
Work Related Day Care		0.00
Spousal Support (from prior marriage)		0.00
Auto Payment		500.00
Auto Insurance, taxes, gasoline, and maintenance ⁷		250.00
SUBTOTAL: 		
Real Property Tax on Residence(s)		
Maintenance for household ⁸		100.00
Adult Clothing		100.00
Children's Clothing ⁹		0.00
Cable Television, Satellite, and Internet/Online Services		0.00
Laundry and Dry Cleaning ¹⁰		25.00
Medical and Dental Expenses (not paid by insurance)		300.00
Prescriptions, Glasses, and Contacts (not paid by insurance)		150.00
Children's incidental expenses ¹¹		0.00
School lunches, supplies, field trips, and fees ¹²		0.00
Entertainment ¹³		250.00
Adult Incidental expenses ¹⁴		200.00
All Installment payments ¹⁵		500.00
Other (Specify):		
SUBTOTAL: 		
TOTAL MONTHLY EXPENSES		

Installment Loan Payments Section

Creditor	For	Monthly Payment	Balance	Owed by ¹⁶
Capital One	Office Bills	500.00	5000.00	Hill, Hill, Hill

Other Debts and Obligations not payable in monthly installments

Creditor	For	Date Payable	Balance	Owed by ¹⁶
Franz/Doctor	Medical Bills	Now	1275.00	
MHSC		Now	8900.00	
Popper		Now	4900.00	
Caroline Eye		Now	500.00	

Are you currently in Bankruptcy? YES NO

Are any obligations listed above, including mortgage and note payments, in arrears? YES NO

If yes, please list the obligations in arrears.

Wife
5 months behind on Rent
5 months behind on car payment

All Marital Property Known to Parties

Assets	Husband/Father	Wife/Mother	Joint
Cash and Money in Checking Account(s)		\$ 85	000
Money in Savings Account(s), Credit Union, Money Market, or Cert. of Dep.			
Value of Voluntary Retirement Account(s)			
Value of Pension Account			
Value of Publicly Held Stocks, Bonds, Securities, Mutual Funds			
Value of Privately Held Stocks and Other Business			
Value of Real Estate - Net of Mortgage Balances			\$ 200,000
Value of All Other Property ¹⁷			
TOTAL ASSETS			

All to be transferred to Wife

Any Non Marital Property Known to Parties

All to remain with Wife

Description of Asset	Title Owner	Date of Acquisition	Source of Funds to Acquirer	Estimate Present market Value
Louisiana Property & Mineral Rights	Joint	1990-97	Father of wife	8 Parcels or Tracts
Louisiana Property & Mineral Rights	Both	1990-97	Father of wife	1000 acres

If total assets are less than \$300,000.00, sign and have notarized.

If total assets are greater than \$300,000.00, itemize assets by completing additional sections below and sign and have notarized.

Financial Accounts Section¹⁸

Owner	Name of Institution	Type of Account	Balance
None	None	None	None

Voluntary Retirement Accounts and Pension Accounts Section

Type of Account	Value
None	None

Publicly Held Stocks, Bonds, Securities, Mutual Funds Section (Non-Retirement)¹⁹

Name of Company	Number of Shares/Type of Account	Value
None	None	None

Real Estate Section²⁰

Owner	Address	Value	Mortgage Balance	Mortgage Equity
	All Louisiana Property & Mineral Rights to Wife			

Other Property Section¹⁷

Owner	Description of Asset	Value	Loan Balance	Equity
Both	5313 Boone Rm Hollywoods	300,000	200,000	100,000


 Signature

Sworn to before me this 8th of Dec
2023.

Karen Shouge (SEAL)

Notary Public for South Carolina

My commission expires: 11/12/2030

Custodial Parent (if applicable): _____

1. A recent paystub should be attached to the Financial Declaration. To compute Principal Earnings from Employment, first determine whether you are paid semi-monthly, biweekly, or weekly. If you are paid semi-monthly, multiply the gross amount of your pay check by two. If you are paid biweekly, multiply the gross amount of your pay check by 26 and then divide by 12. If you are paid weekly, multiply the amount of your paycheck by 52 and divide by twelve. Round to the nearest whole dollar.
2. To compute Overtime, Tips, Commission, and/or Bonuses, take an average of your monthly earnings from overtime, tips, commission, bonuses, etc. from the past three years or the length of employment if employed less than three years (including this year).
3. To compute State, Local, and Social Security Tax deductions, use the same formula used to compute principal earnings in endnote 1 above, or consult or have your attorney consult an accountant.
4. Net monthly Income is equal to Total Gross Monthly Income minus Total Monthly Deductions.
5. Do not include any expense in the Monthly Expenses section that has already been included in the Deductions from Gross Monthly Income on page one of the Declaration.
6. Food Expense is to include the cost of groceries, toiletries, cleaning supplies, and casual eating out.
7. Auto Expenses are to include gasoline, oil changes, tune-ups, tire replacement, maintenance, and related items.
8. Maintenance for Household is to include appliance and household repairs, landscaping, house cleaning, pest control, pool service, alarm service, and other related items.
9. Clothing Expense is to include shoes and clothing purchases, clothing repair and alterations, and related items.
10. Laundry Expense is to include the cost of laundry service, dry cleaning, and related items.
11. Children's Incidental Expenses are to include allowance, summer camp, baby sitters, lessons, activities, participatory sports, and related items.
12. School Expense is to include tuition, supplies, field trips, dues, tutors, locker-rentals, school lunches, and other related items.
13. Entertainment is to include movies, theater, vacations, sporting events, compact discs, digital video discs, and related items.
14. Adult Incidental Expenses are to include cosmetics, hair and nail care, books, magazines, newspapers, business dues, memberships, pets, charity, religious dues or tithes, gifts, bank charges, hobbies, and related items.
15. All Installment Loan Payments is the total amount itemized in Installment Loan Payments Section, which should include all loan payments not already listed as a monthly expense. Examples: home equity loan, credit cards, etc.
16. Indicate which spouse legally owes the payment (husband, wife, or joint).
17. Other property is to include automobiles (minus loan balance), boats (minus loan balance), furniture, furnishings, china, silver, jewelry, collectibles, and other personal property.
18. Itemize Financial Accounts such as checking, savings, credit union, money market, or certificate of deposit accounts in the Financial Accounts Section.
19. Itemize Publicly Held Stocks, Bonds, Securities, Stock Options and Mutual Funds (excluding retirement accounts) in the Publicly Held Stocks, Bonds, Securities, Mutual Funds Section.
20. Itemize each parcel of Real Estate in the Real Estate Section.

RECEIVED

Apr 15 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

The Honorable Maite Murphy
Circuit Court Judge

Appellate Case No. 2025-001651

Hill Family 2008 Trust and Yvonne Herold, Respondents,

v.

Teresa Hill, Appellant.

PROOF OF SERVICE

I, Jesse Sanchez, Esquire, certify that I have contemporaneously with filing served Respondents' Return to Appellant's Petition for Supersedeas and Emergency Motion for Stay on Appellant Teresa Hill, Esquire at her AIS-designated email: hilllawfirm@pm.me on April 15, 2026.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)
751 Johnnie Dodds Boulevard, Suite 200
Mount Pleasant, South Carolina 29464
(843) 814-8181

jesse@jessesanchezlaw.com

**Attorney for Respondents Hill Family 2008 Trust and
Yvonne Herold, Trustee**

April 15, 2026
Mount Pleasant, South Carolina

April 15, 2026

VIA EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED
Apr 15 2026
SC Court of Appeals



RE: Hill Family 2008 Trust and Yvonne Herold, Trustee, Respondents v.
Teresa Hill, Appellant - Appellate Case No. 2025-001651

Dear Ms. Kitchings,

Attached for filing on behalf of Respondents Hill Family 2008 Trust and Yvonne Herold, Trustee, please find the following:

1. Respondents' Return to Appellant's Petition for Supersedeas and Emergency Motion for Stay;
2. Separately filed Exhibits to the Return; and
3. Proof of Service of the Motion on Appellant.

Thank you for your assistance with this matter. Should you have any questions or wish to discuss the filing, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez
Jesse Sanchez (SC Bar No. 101906)

Attachments (as stated)

Cc: Teresa Hill, Esquire
Daniel S. Slotchiver, Esq.
Anna E. Richter, Esq.