

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

Case No. 2024-CP-39-00404

**Complete Heating and Air, LLC,
Plaintiff,**

v.

**Michelle Lindsay and Shaun Lindsay,
Defendants.**

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA
2026 APR 28 A 11:34

RECEIVED

MAY 04 2026

SC Court of Appeals

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that Defendant Shaun Lindsay, appearing pro se, hereby appeals to the South Carolina Court of Appeals from the Order entered on or about April 21, 2026, by the Honorable Jessica A. Salvini in the above-captioned matter.

The appealed Order denied Defendant's Motion to Vacate Judgment pursuant to Rule 60(b)(4), SCRPC, together with related motions and objections concerning jurisdiction, service of process, notice, enforcement, contempt-related proceedings, and due process concerns.

Defendant specifically asserts that the judgment is void due to lack of personal jurisdiction, lack of effective notice, unresolved service defects, disputed liability, disputed accounting, and denial of due process.

This appeal is taken on the grounds that the trial court committed reversible error and/or abused its discretion, including but not limited to the following:

1. Failing to vacate a judgment alleged to be void for lack of personal jurisdiction where Defendant asserts he was not properly served in accordance with Rule 4 and Rule 4(b), SCRPC;
2. Failing to adequately address evidence presented regarding improper service, including:
 - o Defendant's asserted non-residence at the alleged service address;
 - o Lack of personal service upon Defendant;
 - o Alleged service involving a minor;
 - o Lack of notice of proceedings;
 - o Evidence that the alleged service location was not Defendant's dwelling house or usual place of abode;

3. Failing to meaningfully consider affidavits, witness statements, documentary exhibits, and evidence concerning residence, separation, notice, and service issues;
4. Failing to address Defendant's assertion that he was not a contracting party to the underlying HVAC agreement, did not personally authorize or enter into the contract, and did not incur the alleged debt;
5. Failing to address Defendant's argument that marriage alone does not create personal contractual liability for a spouse's alleged debt, particularly where Defendant asserted separation, independent finances, lack of contractual privity, and absence of any written agreement binding Defendant individually;
6. Failing to require or address accounting for payments alleged to have been made toward the claimed debt, despite Defendant disputing the balance asserted by Plaintiff;
7. Concluding that Defendant failed to establish a meritorious defense despite Defendant asserting:
 - o **improper service;**
 - o **lack of jurisdiction;**
 - o **disputed liability;**
 - o **disputed amount;**
 - o **lack of notice;**
 - o **due process violations;**
8. Entering or upholding rulings despite allegations that filings mailed to the Clerk of Court by certified mail and USPS tracking were not timely docketed prior to ruling;
9. Allowing continued enforcement of the judgment despite unresolved jurisdictional objections, disputed accounting, and alleged defects in notice and service;
10. Permitting contempt-related enforcement despite Defendant's assertion that he lacked notice of the relevant proceedings and was deprived of a meaningful opportunity to be heard.
11. Failing to provide Defendant a meaningful opportunity to appear, contest liability, challenge the amount claimed, and present defenses prior to entry and enforcement of judgment.

WHEREFORE, Defendant respectfully requests that the South Carolina Court of Appeals review the Order entered in this matter and grant such relief as may be just and proper.

Respectfully submitted,

Shaun Lindsay

Shaun Lindsay
Pro Se Defendant/Appellant
101 Rainbow Drive #14938
Livingston, TX 77399
shaun@shaunlindsay.com
Date: 4.22.2026

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA
2026 APR 28 A 11:34

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the following filings:

- 1. Letter to David Wyatt Attorney for Complete Heat and Air**
- 2. Notice of Appeal**
- 3. Emergency Motion for Stay of Enforcement Pending Appeal filed with the South Carolina Court of Appeals**
- 4. Certificate of Service**

were served upon counsel for Plaintiff/Respondent by depositing same in the United States Mail, postage prepaid, and/or by electronic delivery, addressed as follows:

David Wyatt, Esq.
1 Whitsett St.
Greenville, SC 29601

This 22nd day of April, 2026.

Respectfully submitted,

Shawn Lindsay

Shaun Lindsay
Pro Se Defendant/Appellant
101 Rainbow Drive
Livingston, TX 77399

CLERK OF COURT
PICKENS COUNTY
SOUTH CAROLINA

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MAY 04 2026

SC Court of Appeals

Clerk of Court

Pickens County Court of Common Pleas 2026 APR 28 A 11: 18

Re: Case No. 2024-CP-39-00404

Complete Heating and Air, LLC v. Michelle Lindsay and Shaun Lindsay

Dear Clerk,

Please accept the enclosed filings for immediate filing and docketing in the above-referenced matter:

1. Cover Letter to Clerk of Court
2. Notice of Appeal
3. Certificate of Service

Additionally enclosed is a courtesy copy of Defendant/Appellant Shaun Lindsay's Motion for Stay Pending Appeal filed with the South Carolina Court of Appeals.

These filings arise from the Order entered April 21, 2026, denying Defendant Shaun Lindsay's Motion to Vacate Judgment and related relief.

I respectfully request that the enclosed trial-court filings be immediately filed/clocked, entered into the official court record, and reflected on the docket.

Because appellate deadlines and preservation of the record are critical, I respectfully request confirmation that these filings have been received and entered.

Thank you for your attention to this matter.

Respectfully,

Shaun Lindsay

Shaun Lindsay

Pro Se Defendant/Appellant

101 Rainbow Drive #14938

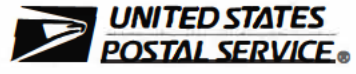
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