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May 26 2026

SC Court of Appeals

2026-UP-21-00023

COMMON PLEAS CASE NUMBER

STATE OF SOUTH CAROLINA

COUNTY OF Florence

Regina Ford

APPELLANT(S)

VS.

Zack Alleyne

RESPONDENT(S)

MAGISTRATE CIVIL CASE NUMBER

IN THE COURT OF COMMON PLEAS

NOTICE OF CIVIL APPEAL

The plaintiff/defendant (circle one), Regina Ford 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 Florence.

This notice of appeal is made subsequent to personal notice of the judgment which was received on the 22nd day of December, 2025.

The appellant's exceptions to the judgment of the magistrate are set forth as follows:

See Attachments

Zack Alleyne
392 W Evans St
Florence SC 29501
843-252-5482

Regina Ford
703 A Mechanics St
Florence SC 29506
803 518 0320

Dated: 1-5-26

Regina
Appellant (or his attorney)

FILED
2026 JAN -5 P 4:21
DORIS POLLOCK O'HARA
COURT CLERK
FLORENCE COUNTY, SC

NOTICE OF AMENDED FILING
STATE OF SOUTH CAROLINA
IN THE CIRCUIT COURT OF FLORENCE COUNTY

Zack Alleyne,
Plaintiff,

v.

Regina Ford,
Defendant, Pro Se

Case No.: 2025CV2110105820

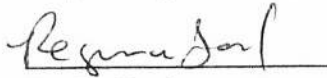
FILED

JAN 05 2026

MAGISTRATE'S
COURT

PLEASE TAKE NOTICE that Defendant hereby files an Amended Emergency Motion to Stay Execution Pending Appeal. This amended filing supersedes and replaces all prior motions to stay previously submitted in this matter. The amendment is submitted to clarify and narrow the issues on appeal to the commercial ejection based solely on the alleged nonpayment of November rent.

Respectfully submitted,



Regina Ford
Defendant, Pro Se

Date: 12/31/25

AMENDED AFFIDAVIT OF FACT

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

This Amended Affidavit supersedes and replaces all prior affidavits filed on this issue.

I, Regina Ford, being duly sworn, state as follows:

1. I am the Defendant in Case No. **2025CV2110105820**, currently pending in the Florence County Circuit Court on appeal from a Writ of Ejectment.
2. I was a commercial tenant occupying a private office located in the rear of the premises at 392 West Evans Street, Florence, South Carolina.
3. Plaintiff filed an Application for Writ of Ejectment after receiving timely payment, which I assert was retaliatory and intended to disrupt my lawful business operations at the office.
4. I paid the November rent in the amount of \$550 on November 5 via Apple Pay, and the funds were deducted from my Navy Federal Credit Union bank account on the same date.
5. On November 6, Plaintiff rejected the payment and then filed for ejectment on the same date, alleging nonpayment of rent.
6. At the December 22, 2025 hearing, after the issue of the security deposit was discussed, Plaintiff admitted that the November rent had been tendered and that he rejected and returned the payment. Plaintiff then asked the Court whether he could offset the November rent with the \$550 security deposit so that he would not have to return the deposit, stating that he had sent the rent payment back.
7. I was evicted despite having paid and timely tendered rent.
8. Enforcement of the Writ of Ejectment will cause the following irreparable harm:
 - a. Loss of access to the office space;
 - b. Disruption of business operations;
 - c. Loss of clients and revenue; and
 - d. Damage to goodwill and professional reputation.
9. I respectfully request that the Court issue an emergency stay of execution of the Writ of Ejectment pending appellate review, in order to preserve my lawful possessory rights,

protect my ongoing business operations, and prevent irreparable harm while this matter is reviewed by the Circuit Court.

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

Date: 12/31/25

Regina Ford
Regina Ford

NOTARY ACKNOWLEDGMENT

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

Sworn to and subscribed before me this 31st day of December, 2025, by Regina Ford, who personally appeared before me, proved her identity, and acknowledged the foregoing to be her free and voluntary act for the purposes stated therein.

Printed Name: Natalie S Knotts

Notary Signature: Natalie S Knotts

My Commission Expires: 4-10-33

| |
|--|
| Natalie S Knotts Notary Public, State of South Carolina My Commission Expires April 10, 2033 |
|--|

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Amended Affidavit of Fact upon:

Zack Alleyne
392 West Evans Street
Florence, South Carolina 29501

by Certified Mail, Return Receipt Requested / Hand Delivery on this 31 day of December, 2025.

Regina Ford

Regina Ford
703 A Mechanics Street
Florence, South Carolina 29506
Phone: 803-518-0320

**AMENDED EMERGENCY MOTION TO STAY EXECUTION PENDING APPEAL
(Commercial Ejectment)**

STATE OF SOUTH CAROLINA
IN THE CIRCUIT COURT OF FLORENCE COUNTY

Zack Alleyne,
Plaintiff,

v.

Regina Ford,
Defendant, Pro Se

Case No.: 2025CV2110105820

This Amended Motion supersedes and replaces all prior motions to stay filed in this matter.

COMES NOW the Defendant, Regina Ford, appearing pro se, and respectfully moves this Honorable Court for an Emergency Stay of Execution of the Writ of Ejectment pending appeal, and states as follows:

FACTUAL BACKGROUND

1. Defendant was a commercial tenant occupying a private office located in the rear of the premises at 392 West Evans Street, Florence, South Carolina.
2. Plaintiff filed an Application for Writ of Ejectment alleging nonpayment of November rent for the commercial space.
3. Defendant paid the November rent in the amount of \$550 on November 5 via Apple Pay, and the funds were deducted from Defendant's Navy Federal Credit Union bank account on the same date.
4. On November 6, Plaintiff rejected the payment and filed for ejectment on the same date, alleging nonpayment of rent.
5. At the December 22, 2025 hearing, after the issue of the security deposit was discussed, Plaintiff admitted that the November rent had been tendered and that he rejected and returned the payment.

6. Plaintiff further asked the Court whether he could offset the November rent with the \$550 security deposit so that he would not have to return the deposit, stating that he had sent the rent payment back.

7. Despite the undisputed tender of rent and Plaintiff's admissions, the Writ of Ejectment was granted.

LEGAL BASIS FOR STAY

8. Under South Carolina commercial contract and ejectment principles, a landlord may not manufacture a default by rejecting timely tender of rent.

9. Where rent has been timely tendered and wrongfully rejected, and where the landlord admits holding a security deposit equal to the alleged rent, ejectment for nonpayment is legally unsupported.

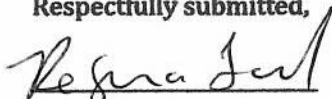
IRREPARABLE HARM

10. Execution of the Writ of Ejectment will cause immediate and irreparable harm, including loss of access to the commercial office, disruption of lawful business operations, loss of clients and revenue, and damage to professional goodwill.

RELIEF REQUESTED

WHEREFORE, Defendant respectfully requests that the Court stay execution of the Writ of Ejectment pending appeal and grant such other relief as the Court deems just and proper.

Respectfully submitted,



Regina Ford

Defendant, Pro Se

Date: 12-31-23

STATE OF SOUTH CAROLINA)
)
COUNTY OF FLORENCE)
)

2025CV2110105820
CIVIL CASE NUMBER
MAGISTRATE'S COURT
RULE TO VACATE OR SHOW CAUSE (EVICTION)

Zack Alleyne
392 W Evans St
Florence, SC 29501

Phone: (843) 252-5482

PLAINTIFF(S)

Vs
Regina Ford
392 W Evans St
Florence, SC 29501

Phone: (803) 518-0323

DEFENDANT(S)

TO Regina Ford : Zack Alleyne is asking this Court to evict you from the property located at 392 W Evans St Florence, SC 29501 because they claim that:

You have failed to pay rent when due or demanded in the amount of \$550.00.

The terms of your tenancy or occupancy have ended.

You have violated the terms or conditions of your lease by:

You the defendant(s) and lessee(s) of the premises listed at the address listed above, and all others, are ordered to vacate the premises immediately pursuant to S.C. Code Ann. §27-37-10 OR contact the:

Florence Magistrate Court
180 North Irby Street (M S C-W)
Florence, SC 29501-3456
(843) 665-0031, FAX 8436617800

within ten (10) days of receiving this notice, for the purpose of scheduling a hearing to show why you should not be evicted from these premises.

FAILURE TO VACATE THE PREMISES OR RESPOND WITHIN TEN (10) DAYS MAY RESULT IN THE ISSUANCE OF A WRIT OF EJECTMENT.

~~11/24/2025~~

[Signature]
Judge, Florence Magistrate Court

Personally appeared before me, the undersigned deponent, being duly sworn, , says s/he is a person over 18 years of age, not a party or attorney in this action and s/he to serve the Rule to Vacate or Show Cause on Regina Ford on the following dates/times:

| DATE | TIME | INITIALS | DATE OF SERVICE | TIME OF SERVICE |
|----------|-------|----------|---|-------------------|
| 1. _____ | _____ | _____ | 12-01-25 | 1423 |
| 2. _____ | _____ | _____ | SETTLED/DATE _____ | VACANT/DATE _____ |
| 3. _____ | _____ | _____ | PERSON SERVED & RELATIONSHIP IF NOT DEFENDANT <u>Regina Ford</u> | |

Sworn to and subscribed before me
This _____ day of _____, 20____.

NOTARY PUBLIC OR JUDGE

[Signature]
SIGNATURE OF SERVER

ON _____ I DEPOSITED IN THE UNITED STATES MAIL IN AN ENVELOPE ADDRESSED TO THE DEFENDANT(S) ABOVE WITH FIRST CLASS POSTAGE AFFIXED THERETO, A COPY OF THIS DOCUMENT.

MAGISTRATE'S CLERK

STATE OF SOUTH CAROLINA

COUNTY OF FLORENCE

2025CV2110105820
CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

WRIT OF EJECTMENT

Plaintiff
392 W Evans St
Florence, SC 29501
2-5482

PLAINTIFF(S)

VS

Regina Ford
392 W Evans St
Florence, SC 29501

DEFENDANT(S)

TO THE SHERIFF/MAGISTRATE'S CONSTABLE:

Upon Judgment of this Court, rendered on the 20th day of November, 2025, you are hereby Ordered to proceed to the premises located at **392 W. Evans St. Florence, SC 29501.**

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 Thursday January 8, 2026 at or after 10:00 am** 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.

November 20, 2025

Frank White

Florence Magistrate Court

_____, 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