

EXHIBIT C

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE PROBATE COURT

IN THE MATTER OF:
THE ESTATE OF LOIS ANN NEEL
(Deceased)

CIVIL CASE NO.: 2021ES0700504

CONTEMPT ORDER

Amanda Leah Schlender, Personal
Representative of the Estate of Lois Neel,
Decedent,

Petitioner,

v.

Virginia Moryadas,

Respondent.

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Jun 02 2026

SC Court of Appeals

PROBATE COURT
BEAUFORT COUNTY, SC

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FILED

This matter came before this Court on the Personal Representative’s Notice of Motion and Motion, (I) Pursuant to SCRPC 37 and SCRPC 45, to Compel Respondent’s Compliance with Demands for Interrogatories and Document Production; and (II) for an Order finding Respondent in Contempt of Court Order dated and entered April 8, 2024 (hereinafter “Motion”), filed on July 2, 2024. This Court held a hearing on the Motion on August 1, 2024, which was attended by counsel to the Personal Representative, Amanda Leah Schlender (hereinafter, the “PR”); Virginia Moryadas; and Mills L. Morrison, Jr., Counsel for Virginia Moryadas. Counsel for the Respondent filed a Motion to Modify Order via ordinary mail which was filed with this Court on August 1, 2024 at 11:54 a.m. but as Respondent’s Motion had yet to be processed into the Court file for review and counsel for the Petitioner had only received a copy on July 31, 2024 and was not prepared to argue Respondent’s Motion, the Motion was not heard at the August 1, 2024 hearing. Based on the evidence submitted to the Court and the representations of counsel made during the hearing, I find as follows:

1. On January 15, 2021, Lois Neel, the Decedent (the “**Decedent**”) in this Probate action passed away. Thereafter, this Probate action was commenced and, pursuant to the express terms of the original Last Will and Testament of the Decedent, Amanda Leah Schlender was appointed the Decedent’s estate’s personal representative (the “**PR**”) by an order of this Court.
2. After the Decedent’s death and commencement of the within Probate action, the PR, via her attorney, filed and served a summons and complaint (the “**Complaint**”) with the Court on May 8, 2023, commencing the above captioned action (the “**Moryadas Action**”) against the Respondent. An answer to the Complaint was filed with the Court by the Respondent on June 26, 2023.
3. Thereafter, the PR, as Petitioner in the Moryadas Action, filed a motion for summary judgment (the “**SJ Motion**”) seeking an order from the Court compelling the Amended Accounting from the Respondent and production of Financial Records relating to the Respondent’s role as POA.
4. Prior to seeking representation, respondent claims to have delivered all records in her possession to Brian T. Treacy, Esquire, Petitioner’s former counsel of record.
5. On March 13, 2024, Respondent filed a purported Accounting with supporting documentation, including an Affidavit of Respondent, attempting to extrapolate expenditures, from the records she claimed to have available.
6. After a hearing on the SJ Motion, the Court entered an order on April 8, 2024 (the “**April 8 Order**”) reflecting the oral agreements made by the parties on the date of the hearing. The April 8 Order directed the Respondent to file an

Amended Accounting and to produce certain financial records. The April 8 Order further directed that the Respondent file the Amended Accounting and produce the Financial Records within sixty (60) days of the date of the order. Accordingly, the Respondent was compelled by the April 8 Order to file and serve the Amended Accounting and production of financial documents on or before June 7, 2024.

7. The Respondent failed to file and serve the Amended Accounting and failed to timely or properly serve Financial Records (or any other document) pursuant to the April 8 Order.
8. In addition to the mandate of the April 8 Order, on May 3, 2024, the Petitioner served a demand for production of documents (the “**Document Demand**”) and Interrogatories (the “**Interrogatories**”) on the Respondent (the Interrogatories and Document Demand are collectively hereinafter referred to as, the “**Production Demands**”). Answers to the Productions Demands were due on June 4, 2024. No documents or responses to the Interrogatories, due to be produced and served on or before June 4, 2024, were produced and/or served on the Petitioner., but 2005 pages were electronically produced before the hearing. These were the same documents tendered to Brian T. Treacy, Esquire, Petitioner’s former counsel, which were previously deemed insufficient. In addition to the Production Demands served on the Respondent, on May 20, 2024, the Petitioner served a SCRPC 45 Subpoena (the “**LCT Subpoena**”), on Low Country Taxes LLC (“**LCT**”), an entity, as reflected in the South Carolina Secretary of State database, in which Respondent is a member and registered

agent. Service on LCT was effectuated on the Registered Agent for LCT as set forth in the South Carolina Secretary of State database.

9. Having not received responses or documents to the Production Demands, on June 17, 2024, the Petitioner served a Rule 11 letter on counsel to the Respondent, notifying Respondent's counsel that if the Respondent did not comply with the Production Demands on or before June 27, 2024, the Petitioner would file a motion seeking an order from the court holding the Respondent in Contempt of the April 8 Order; a motion to compel compliance with the Production Demands and the LCT Subpoena; and that sanctions would be sought.
10. Because the Respondent has failed to comply with the April 8 Order and respond to the Production Demands, and LCT has failed to comply with the LCT Subpoena, the Petitioner filed a Motion (the "**Contempt Motion**") seeking an order from this Court: (a) directing and compelling the Respondent to respond to the Production Demands; (b) finding LCT in violation of and contempt of the LCT Subpoena and directing and compelling compliance therewith and awarding the Petitioner Sanctions under Rule 45(c); and (c) finding the Respondent in violation and contempt of the April 8 Order, compelling compliance and sanctioning the Respondent for violating and acting in contempt of the April 8 Order.
11. A hearing on the Motion was held before this Court on August 1, 2024 (the "**Hearing**"). Respondent contended she was physically, mentally, and legally

unable to comply. Respondent also argued that Ms. Neel continued to write checks and use credit cards. The Court did not find said arguments had merit.

12. Upon argument and evidence adduced at the Hearing, this Court ruled that:

- a. The April 8 Order was duly and timely served on counsel to the Respondent;
- b. Respondent has willfully disobeyed the April 8 Order by failing to prepare, file and serve an Amended Accounting and produce Financial Records pursuant to the terms of the April 8 Order;
- c. Respondent's disobedience of the April 8 Order was done voluntarily and intentionally with the specific intent to fail to do something the law requires to be done;
- d. Respondent failed to produce documents pursuant to the Document Demands and the LCT Subpoena.

IT IS THEREFORE ORDERED as follows:

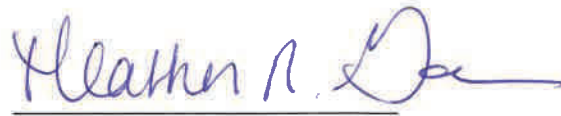
- A. Respondent is in contempt of Court as a result of her willful disobedience of this Court's April 8 Order;
- B. Respondent was tardy in producing and has failed to adequately produce responses to the Document Production and the LCT Subpoena, by June 4.
- C. Based upon Respondent's contempt of the April 8 Order, Respondent shall pay sanctions to the Decedents' Estate in the sum of the full cost of a forensic accounting performed by The Hobbs Group Certified Public Accountants and Consultants, PA (the "**Hobbs Group**")¹;

¹ A copy of the Engagement Agreement executed by and between the PR and Hobbs Group and a copy of the initial retainer check paid by the PR is annexed hereto, collectively, as Exhibit A.

- D. On or before September 15, 2024, Respondent shall initially remit the sum of five-thousand dollars (\$5000.00) to counsel to the Petitioner by check delivered to the Coppage Law Firm, 1010 Carteret Street, Beaufort, South Carolina 29902, which funds represent the funds paid to date by the PR to the Hobbs Group;
- E. Within ten (10) days of submission to and filing with the Court, and written notice to Respondent's attorney, of all invoices from the Hobbs Group (the "**Invoices**"), Respondent shall remit, and Coppage Law Firm shall receive a check, for the entire balance due on each of the prospective Invoices filed with the Court;
- F. Based the Respondent's contempt of the April 8 Order and upon the Respondent and LCT's failure to respond and produce documents pursuant to the Production Demands and the LCT Subpoena, Respondent shall also pay all attorneys' fees, costs and expenses upon further order of this Court following submission by the PR's attorney of an Affidavit of Attorney's Fees subject to review and a hearing held, if deemed necessary, by this Court.

AND IT IS SO ORDERED.

August 29th, 2024
Beaufort, South Carolina


Heather R. Galvin, Judge
Beaufort County Probate Court

2024 AUG 29 PM 5:43
PROBATE COURT
BEAUFORT COUNTY, SC

FILED

EXHIBIT A

1704 Laurel Street
Columbia, SC 29201

PO. Box 2411
Columbia, SC 29202

Phone (803) 799-0555
Fax (803) 799-4212



125 W. Stone Avenue
Greenville, SC 29609

Phone (864) 271-7503
Fax (864) 751-5889

www.hobbscpa.com

July 17, 2024

Ms. Denise L. Savage, Esquire
Coppage Law Firm
Post Office Box 2473
Beaufort, South Carolina 29901

VIA EMAIL dsavage@coppagelawfirm.com

Accounting for Financial Transactions in the Matter of Estate of Lois Ann Neel, Amanda Lee Schlender, Personal Representative of the Estate of Lois Neel, Decedent, vs. Virginia Moruadas
Probate File No. 2021-ES-07-00504

Dear Ms. Savage:

This letter will serve to confirm our understanding and agreement whereby you have retained us to assist you in the above referenced matter. Our role will commence as a consulting expert but may evolve into a testifying expert after we have fully evaluated the facts, circumstances and the evidence. We plan to perform accounting for all of the financial records provided to us during the period from the death of Mr. Charles Neel through a current date. There is evidence from our preliminary examination of credit card activity that financial and elder abuse may have occurred. We anticipate using an accounting software package to enter transactions provided to us to provide evidence to where the assets have been spent during the time period under review. At this time, we could be missing statements and necessary data to complete our work. Once engaged, we plan to inventory all records and provide to you any information about data we may still need or gaps in the information we have. We also understand that the main caretaker of Mrs. Neel during this time frame has died and therefore this could impair our resolution of certain transactions.

Our fees will be based on the actual time incurred at the hourly billing rates set forth as follows:

Mark T. Hobbs, CPA CFF	\$ 395.00
Carlita Bartholomew	\$ 150.00
Jennifer Cummings	\$ 90.00

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Ms. Denise L. Savage
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July 17, 2023

We request a fee retainer of \$ 5,000 to assist in this matter. Our fee is not contingent on the results obtained, as we do not warrant or predict results in this matter. We anticipate commencing our work once we receive this signed authorization to proceed and our retainer. Our policy is to bill additional amounts as our retainer is exhausted. Our hope would be we could complete the accounting within the amount requested in the retainer.

You agree that any dispute (other than our efforts to collect an outstanding invoice) that may arise regarding the meaning, performance or enforcement of this engagement or any prior engagement that we have performed for you, will, prior to resorting to litigation, be submitted to mediation, and that the parties will engage in the mediation process in good faith once a written request to mediate has been given by any party to the engagement. Any mediation initiated as a result of this engagement shall be administered within the county of Richland County, South Carolina by a mutually agreeable mediator certified by the South Carolina Supreme Court, according to its mediation rules, and any ensuing litigation shall be conducted within said county, according to South Carolina law. The results of any such mediation shall be binding only upon agreement of each party to be bound. The costs of any mediation proceeding shall be shared equally by the participating parties.

Statements for services will be rendered to you monthly. Please call should you have any questions or comments on this letter.

Sincerely,



Mark T. Hobbs, CPA, CFF
Managing Shareholder

AGREED TO AND ACCEPTED BY:


Amanda Schlender, PR of the Estate

7-22-24
Date

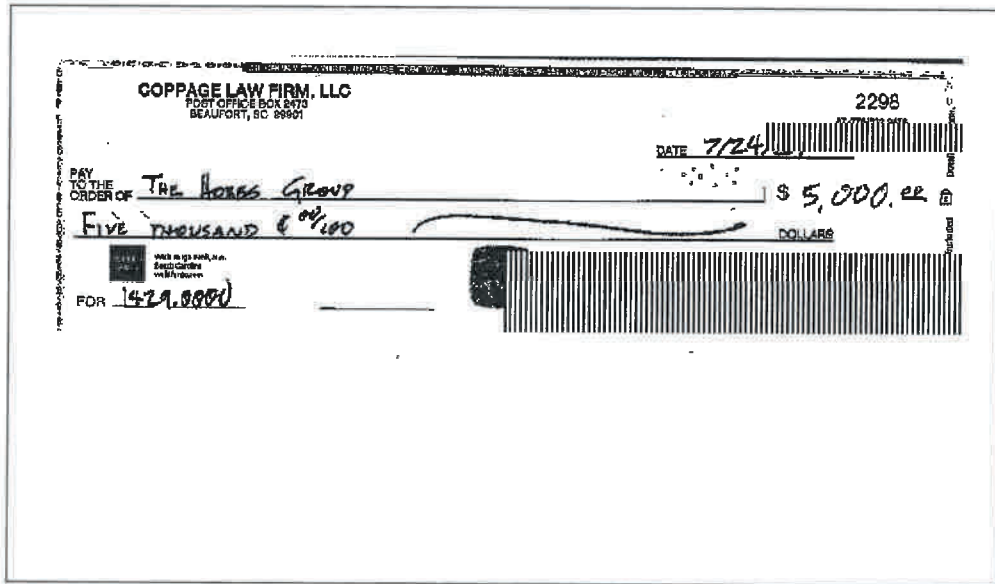
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Check Details

Item 4 of 29 [Show full image*](#)

 Print

Check Number	2298
Date Posted	07/30/24
Check Amount	\$5,000.00



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* For your security, information like account numbers, signatures, and the ability to view the backs of checks have been removed from the images.

You can see full or partial fronts and backs of the images by using the link at the top of the window.

 Equal Housing Lender

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LAW OFFICES OF
DARRELL THOMAS JOHNSON, JR., LLC
300 MAIN STREET
POST OFFICE BOX 1125
HARDEEVILLE, SOUTH CAROLINA 29927

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2024 AUG -1 AM 11:54
PROBATE COURT
BEAUFORT COUNTY, SC

DARRELL THOMAS JOHNSON, JR. *
MILLS L. MORRISON, JR. **
WARREN P. JOHNSON
JOSHUA R. FESTER
* Certified Mediator
** Also Licensed in Georgia

Telephone: 843-784-2142
Facsimile: 843-784-5770
tdjohnson1@johnsonslawoffice.com

July 29, 2024

Beaufort County Probate
Attn.: Clerk
Post Office Box 1083
Beaufort, SC 29902

RE: Amanda Leah Schlender, Personal Representative of the Estate of Lois Ann
Neel v. Virginia Moryadas
In the Beaufort County Probate Court
Estate File No.: 2021-ES07-0054
Our File No.: 13-750-08-200-23

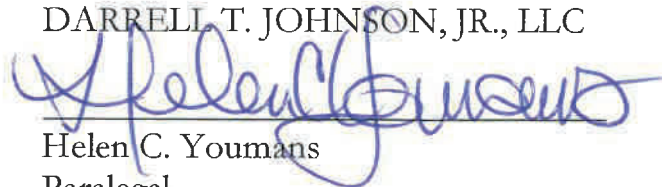
Dear Madam or Sir:

Enclosed please find Respondent's Notice of Motion and Motion to Modify Order as well as a Proof of Delivery in the above-referenced matter. We ask that you please file the aforementioned and return stamped copies to me via the self-addressed stamped envelope that I have provided.

Should you have any questions or concerns or need any additional information or materials, please contact our office.

With best wishes, I am

Sincerely,
LAW OFFICE OF
DARRELL T. JOHNSON, JR., LLC



Helen C. Youmans
Paralegal

/hcy
Enclosure