

EXHIBIT G

2026CP070 1117

STATE OF SOUTH CAROLINA )  
COUNTY OF BEAUFORT )  
) )  
IN THE MATTER OF ESTATE OF )  
LOIS ANN NEEL: )  
) )  
AMANDA LEAH SCHLENDER, Personal )  
Representative of the Estate of Lois Ann Neel, )  
Decedent, )  
) )  
Petitioner, )  
) )  
v. )  
) )  
VIRGINIA MORYADAS, DEMETRA BUTLER, )  
DEREK BUSH, SARAH G. BUSH (a/k/a Sara )  
G. Bush, a/k/a Sarah G. Grant, a/k/a Sara G. Grant,) )  
a/k/a Sarah Gloria Bush; a/k/a Sarah Grant Bush, )  
a/k/a Sara Gloria Bush, a/k/a Sarah Gloria Bush), )  
LOW COUNTRY TAXES, LLC (a South Carolina )  
Limited Liability Company), Jung K. Chung, and )  
The Estate of Sarah Bush and her Heirs, and JOHN )  
DOES and MARY DOES, A through Z )  
) )  
Respondents. )  
) )

IN THE PROBATE COURT  
CASE NO. 2021ES0700504

ORDER REMOVING  
FORMAL PROCEEDING  
TO CIRCUIT COURT

**RECEIVED**  
**Jun 02 2026**  
**SC Court of Appeals**

JUN 02 3 30 PM '26

WHEREAS, *under S.C. Code Ann. ("Code") §§ 62-1-302(d)(5)*, formal proceedings involving an action in which there is a right to trial by jury and in which the amount in controversy is at least five thousand dollars (\$5,000.00) in value must be removed from the Probate Court to the Circuit Court to proceed *de novo*, on motion of a party, made not later than ten days after the date on which all responsive pleadings must be filed in the actions; and

WHEREAS, on May 8, 2023, Amanda Leah Schlender, Personal Representative of the Estate of Lois Ann Neel ("Petitioner") filed a Summons and Petition for Accounting and Other Related Relief ("Petition"), to commence the action captioned above asserting formal causes of action for (1) Negligence and Breach of Trust Against Virginia Moryadas as Agent under Durable Power of Attorney for Lois Neel, Decedent; (2) Conversion against Virginia Moryadas as Agent under a Durable Power of Attorney for Lois Neel; (3) Breach of Fiduciary Duty Against Virginia Moryadas in her Capacity as Agent under a Durable Power of Attorney for Lois Neel; (4) For an Accounting from Virginia Moryadas in her Capacity as Agent of the Durable Power of Attorney

for Lois Neel; and (5) Unjust Enrichment Against Virginia Moryadas in her Capacity as Agent of the Durable Power of Attorney of Lois Neel; and

WHEREAS, Respondent Virginia Moryadas filed her Answer on June 26, 2023; and

WHEREAS, Petitioner filed a Motion to Amend Petition on December 6, 2024; and

WHEREAS, Anita Moryadas Theisen filed a Motion to Quash Subpoena on December 30, 2025 ("Motion to Quash"); and

WHEREAS, Petitioner filed Petitioner's Objection to Anita Moryadas Theisen's Motion to Quash Subpoena and Request for Award of Sanctions, Attorneys' Fees, Costs and Expenses Pursuant to SCRCP 11, 37, and 45 ("Petitioner's Objection to Motion to Quash"); and

WHEREAS, on January 27, 2026, this Court allowed ten (10) days to file a final brief in reply to Petitioner's Objection to Motion to Quash; and

WHEREAS, a Reply to Response to Motion to Quash was filed on February 12, 2026; and

WHEREAS, Petitioner filed her Summons and First Amended Petition to add additional Respondents and causes of action on February 12, 2026, as allowed by this Court after a hearing held on January 28, 2026; and

WHEREAS, Petitioner filed a Proof of Delivery on February 13, 2026, stating she mailed or delivered, by certified mail or electronic message, the Summons and Amended Petition on all Respondents on February 12, 2026<sup>1</sup>; and

WHEREAS, on February 19, 2026, Respondent Virginia Moryadas filed a Motion for Removal to Circuit Court ("Removal Motion") under Code §§ 62-1-302(d)(5); and

WHEREAS, on March 23, 2026, Respondent Virginia Moryadas filed an Answer to Petitioner's Amended Petition, and Counterclaim; and

WHEREAS, on March 24, 2026, Respondent Virginia Moryadas filed a Renewed Motion for Removal to Circuit Court ("Renewed Removal Motion") under Code §§ 62-1-302(d)(5); and

WHEREAS, upon the filing of an amended petition, the time allowed for a motion to remove is renewed<sup>2</sup>; and

WHEREAS, the Removal Motion was made not later than ten (10) days following the date on which all responsive pleadings must be filed; and

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<sup>1</sup> This Order does not make any determination as to whether service on all Respondents was accomplished in accordance with *Rule 4, SCRCP*.

<sup>2</sup> See *Hiers by Hiers v. Mullens* (S.C.App. 1992) 310 S.C. 63, 425 S.E.2d 57.



WHEREAS, Petitioner has not filed any Objection to Petitioner's Removal Motion; and

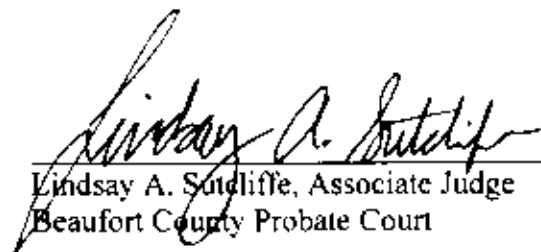
WHEREAS, under Code § 62-1-302(f), if an action described in § 62-1-302(d) is removed to the Circuit Court by motion of a party or by the Probate Court on its own motion, the Probate Court may, in its discretion, remove to the Circuit Court any other related matters which are before the Probate Court, if the Probate Court finds that the removal of such related matters would be in the best interest of the estate or in the interest of judicial economy; and

WHEREAS, this Court has determined to remove to the Circuit Court the formal proceeding commenced by Petitioner under Code §§ 62-1-302(d)(5); and

WHEREAS, this Court finds that it would also be in the best interest of the estate and in the interest of judicial economy for the Counterclaim and Motion to Quash to be litigated in the same judicial forum; now, therefore, pursuant to Code §§ 62-1-302(d)(5), and (f), it is

HEREBY ORDERED that the formal proceeding captioned above, answer and counterclaim, and Motion to Quash all described above be and are hereby removed to the Circuit Court for proceedings *de novo*. This Probate Court retains continuing exclusive jurisdiction over the administration of this Estate.

AND IT IS SO ORDERED.

  
Lindsay A. Sudliffe, Associate Judge  
Beaufort County Probate Court

Beaufort, South Carolina

April 30, 2026

2026 APR 30 PM 3:40  
CLERK OF COURT



STATE OF SOUTH CAROLINA )  
COUNTY OF BEAUFORT )

IN THE PROBATE COURT  
CASE NO. 2021ES0700504

*2026 CP 070117*

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

AMANDA LEAH SCHLENDER, Personal )  
Representative of the Estate of Lois Ann Neel, )  
Decedent, )

Petitioner, )

v. )

ORDER REMOVING  
FORMAL PROCEEDING  
TO CIRCUIT COURT

VIRGINIA MORYADAS, DEMETRA BUTLER, )  
DEREK BUSH, SARAH G. BUSH (a/k/a Sara )  
G. Bush, a/k/a Sarah G. Grant, a/k/a Sara G. Grant,) )  
a/k/a Sarah Gloria Bush; a/k/a Sarah Grant Bush, )  
a/k/a Sara Gloria Bush, a/k/a Sarah Gloria Bush), )  
LOW COUNTRY TAXES, LLC (a South Carolina )  
Limited Liability Company), Jung K. Chung, and )  
The Estate of Sarah Bush and her Heirs, and JOHN )  
DOES and MARY DOES, A through Z )  
Respondents. )

2026 APR 30 PM 3:57

**TO: CIRCUIT COURT FOR THE FOURTEENTH JUDICIAL CIRCUIT OF SOUTH  
CAROLINA:**

This certifies that the attachments are true copies of the proceedings in the above-  
referenced matter (commenced in Probate Court Case No. 2021ES0700504), which are submitted  
herewith by reason of the removal of the matter to the Circuit Court by Order of the Beaufort  
County Probate Court (copy attached) entered April 30, 2026, pursuant to S.C. Code Section 62-  
1-302(d).

*Alexandra Greene*

Deputy Clerk of Probate Court  
Beaufort County Probate Court

Beaufort, South Carolina  
April 30, 2026

**CERTIFICATE OF MAILING**

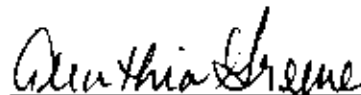
This certifies that a true copy of the foregoing Certificate of Return to Circuit for Case on Removal, without attachments, was this day mailed by U.S. Mail, first class and postage prepaid, to the following named persons at their respective addresses shown below:

Denise L. Savage, Esquire  
Coppage Law Firm, LLC  
Post Office Box 2473  
Beaufort, SC 29901

Darrell Thomas Johnson, Jr. Esquire  
Law Office of Darrell T. Johnson, Jr., LLC  
P.O. Box 1125  
Hardeeville, SC 29901

Larry J. Cohen, Esquire  
Cohen Law Firm  
PO Box 10056  
Phoenix, AZ 85064

Marilyn Kosciwa  
112 W. Gazebo Lane  
Savannah, GA 31410

  
\_\_\_\_\_  
Deputy Clerk of Probate Court  
Beaufort County Probate Court



State of South Carolina	In the Court of Common Pleas
County of: <u>Beaufort</u> [Fill in the County Where this Form will be Filed]	<u>Fourteenth</u> [Fill in the Circuit Where this Form will be Filed] Judicial Circuit

Plaintiff(s): <u>Amanda Leah Schlender, Personal Representative of the Estate of Lois Ann Neel, Decedent</u> [Fill in Plaintiff(s) Name]  v.  Defendant(s): <u>Virginia Moryadas</u> [Fill in Defendant(s) Name]	Case No. <u>2020 CP0701117</u> [Fill in Case Number]
--	---

2020 APR 23 11:44 AM  
 CLERK OF COURT  
 JUDICIAL BRANCH  
 BEAUFORT COUNTY, SC

### Civil Action Coversheet

Submitted By: Darrell Thomas Johnson, Jr.  
[Fill in Name of Filer]

Address: P.O. Box 1125, Hardeeville, SC 29927  
[Fill in Address of Filer]

SC Bar Number: 3010  
[Fill in Filer's South Carolina Bar Number]

Telephone #: 843-784-2142  
[Fill in Filer's Telephone Number]

Fax #: 843-784-5770  
[Fill in Filer's Fax Number]

Other: \_\_\_\_\_  
[Fill in Filer's Other Contact Information (if applicable)]

Email: tdjohnson1@johnsonslawoffice.com  
[Fill in Filer's Email Address]



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 SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.**

Submitting

Party Signature:   
[Submitting Party Signature]

Date:

[Fill in Date]



**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 Discrimination (170)
- Employment (180)
- Other (199)

**Torts- Professional Malpractice**

- Dental Malpractice (200)
- Legal Malpractice (210)
- Medical Malpractice (220)
- Notice of Intent Case No. [Fill in Notice of Intent Case Number]

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- 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**

- Reinstatement Driver's License (800)
- Judicial Review (810)
- Relief (820)
- Permanent Injunction (830)
- Forfeiture- Petition (840)
- Forfeiture- Consent Order (850)
- Other (889)

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