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**Jun 11 2026**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

APPEAL FROM GREENVILLE COUNTY COURT OF COMMON PLEAS  
Jane H. Merrill, Circuit Court Judge

**Appellate Case No. 2026-001176**

David M. Duree and David M. Duree & Assocs., P.C..... Appellants,

V.

Glory Mace,..... Respondent

**APPELLANTS' VERIFIED RESPONSE TO RESPONDENT'S MOTION TO  
DISMISS THE APPEAL AS MOOT OR, ALTERNATIVELY, TO STAY  
PROCEEDINGS**

COME NOW Appellants, David M. Duree and David M. Duree & Associates P.C., by their attorney, Sarah Hurley, for their Verified Response to respondent's motion to dismiss appeal as moot or, alternatively, to stay proceedings, and respectfully submit the following:

1. Respondent entered into a legal services agreement with the Appellants to investigate and litigate respondent's claims against an Illinois car dealer, located in Springfield Illinois, with respect to a Lamborghini automobile respondent purchased from that Illinois car dealer online. The legal services contract was formed in Illinois when it was signed there by appellants after respondent had signed it in South Carolina.

2. The legal services agreement was performed, and was to be performed, entirely within the state of Illinois.

3. Eventually respondent stopped communicating with appellants who filed suit in Illinois to collect the amount due under the legal services

agreement (a little over \$2,900.00).

4. Appellant filed a counterclaim in Illinois and testified and participated in the Illinois trial remotely, by Zoom, pursuant to a court order issued in Illinois.

5. The Illinois Trial Court entered judgment in favor of appellants and against respondent in a sum a little over \$2,900.00 during October 2024 and denied respondent's counterclaim, entering judgment for appellants on respondent's counterclaim.

6. Appellants retained an attorney who registered the Illinois judgement in Greenville County South Carolina. Numerous copies were served on respondent by email and first-class mail. The initial copies were served on respondent less than a week after the Illinois judgement was initially registered in South Carolina.

7. Respondent entered an appearance in the initial South Carolina registration of the Illinois judgement and moved for dismissal, contending that she was denied due process in Illinois because she did not have minimum contacts with the state of Illinois, and because she was not personally served with a copy of the initial South Carolina registration of the Illinois judgement.

8. Appellants filed a motion for sanctions against respondent because she had entered an appearance and personally participated in the initial registration of the Illinois judgement in South Carolina, and because she had more than minimum contacts with Illinois in that she contracted with appellants to file litigation in Illinois against an Illinois car dealer. The legal

services agreement was formed in Illinois and was completely preformed in Illinois.

9. The trial court dismissed the initial registration of the Illinois judgement in South Carolina on the ground that respondent had not been personally served with the initial South Carolina registration of the Illinois judgement, and denied appellants' motion for sanctions as a result.

10. Appellants filed this appeal from that order.

11. Appellants then filed a second South Carolina registration of the Illinois judgement, which was personally served on respondent, who has filed a motion to dismiss the second South Carolina registration of the Illinois judgement on the ground that respondent did not have minimum contacts with the state of Illinois. Appellants will be responding.

12. South Carolina courts have previously ruled that the performance of a contract within South Carolina, by parties who are not citizens of the state of South Carolina, is sufficient contact with the state of South Carolina to provide the South Carolina courts with jurisdiction over claims relating to the performance, or breach, of a contract which was partially performed in the state of South Carolina, *Cribbs v. Spatholt* 676 S.P. 2d 714, 720-721, 382 S.C. 490, 502 (S. C. App. 2009). The same analysis applies here.

13. The fact that respondent acknowledges that the second registration of the Illinois judgement in South Carolina has been personally served on her does not moot the issues raised in this appeal that (1) she was properly served and participated in the initial South Carolina case which should not

have been dismissed, and (2) that the Trial Court should have heard, on the merits appellants' motion for sanctions against respondent for arguing that she did not have minimum contact with the state of Illinois when she entered into a contract there which was preformed entirely in the state of Illinois.

WHEREFORE, Appellants respectfully submit that respondent's motion to dismiss the appeal as moot or to stay proceedings should be denied.

/s/ Sarah Day Hurley  
Sarah Day Hurley (SC Bar No. 16241)  
Hurley Law PA  
15 South Main Street, Suite 501  
Greenville, South Carolina 29601  
Tel: (864) 775-5870  
[shurley@hurleylawsc.com](mailto:shurley@hurleylawsc.com)  
*Attorney for Plaintiffs*

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AFFIDAVIT

STATE OF ILLINOIS     )  
  ) SS  
COUNTY OF ST. CLAIR )

David M. Duree, being duly sworn upon his oath, deposes and states:

1.     The facts and matters set forth in the above and foregoing verified response are true and correct to my best knowledge, information, and belief.

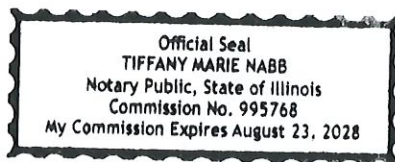
Dated this 10<sup>th</sup> day of June, 2026.

David M Duree  
David M. Duree

   SUBSCRIBED AND SWORN TO before me, a Notary Public, this 10 day of June, 2026.

Tiffany M. Nabb  
NOTARY PUBLIC

MY COMMISSION EXPIRES: 8/23/28



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of above and foregoing verified response electronically by the court system, and additional copies have been served on Respondent Glory Mace aka Glory Mace Sanders by email and by first-class mail at the addresses set forth below on the 11<sup>th</sup> day of June, 2026.

Glory Mace  
112 Peachtree Drive  
Greer, SC 29651  
[Glory.mace@icloud.com](mailto:Glory.mace@icloud.com)  
[Glory.aegis@gmail.com](mailto:Glory.aegis@gmail.com)  
*Respondent*

/s/ Sarah Day Hurley  
Sarah Day Hurley (SC Bar No. 16241)  
Hurley Law PA

# HURLEY LAW PA

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

Re: David M. Duree and David M. Duree & Assocs., P.C. v. Glory Mace  
Appellate Case No. 2026-001176

Dear Ms. Kitchings:

Enclosed for filing please find *Appellant's Verified Response to Respondent's Motion to Dismiss the Appeal as Moot or, Alternatively, to Stay Proceedings*, along with a certificate of service.

Please let me know if you need anything further at this time.

Sincerely,



Sarah Day Hurley

Enclosure

cc: Ms. Glory Mace