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Jun 12 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Hon. Patrick C. Fant, III, Circuit Court Judge

Trial Court Case No. 2022-CP-00108

American Pharma Machinery, LLC. Appellant,

Vs.

Clements Electrical, Inc., Alton Frederick Clements, Jr., Janet Gay Clements, Jason Dix,
Nicholas Behringer, Sherry L. Burgess, Nicholson H. Jerry, Francesco Majia Armando Frank,
Melissa C. Chastain, Jared Adam Pierce. Respondents.

NOTICE OF APPEAL

NOW INTO COURT COMES Appellant American Pharma Machinery, LLC by and
through undersigned counsel and hereby appeals the Form 4 Order entered on 5th March, 2026
that granted the Defendants' Motion To Reconsider, thereby striking the Plaintiff's complaint.
Appellant also appeals the Order Granting Defendants' Motion To Strike American Pharma
Machinery, LLC's Complaint that was entered on 18th March, 2026. Appellant received written
notice of entry of the above orders from the Oconee County Clerk of Court on 14th May, 2026.¹

[SIGNATURE PAGE TO FOLLOW]

¹ Appellant's trial counsel, Ashley Boatwright, Esq., has been suspended from the practice of law by the
South Carolina Supreme Court on an interim basis.

Respectfully Submitted,

By: s/ *John E. Chambers, Jr.*
John E. Chambers, Jr.
SC Bar No: 9027
100 Lewis Drive Suite 15A
Greenville, South Carolina 29605
(864) 884-33340
john.chambers.sc@gmail.com
Attorney For Appellant

12th June, 2026
Greenville, South Carolina

Other Counsel of Record:

Howard E. Sutter, III, Esq.
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Nicholas Behringer, Sherry L. Burgess, Nicholson H. Jerry, Francesco Majia Armando Frank,
Melissa C. Chastain, Jared Adam Pierce. Respondents.

PROOF OF SERVICE

I, John E. Chambers, Jr., do hereby certify that on **12th June, 2026**, I have served the Respondents in the above captioned action on the date set forth herein, with a true copy of the Appellant's **Notice of Appeal** and **Orders On Appeal** via email to counsel's email address as indicated by the AIS.

Parties Served:

Howard E. Sutter, III, Esq.
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Liberty, SC 29657
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By: **s/ John E. Chambers, Jr.**
John E. Chambers, Jr.
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(864) 884-33340
john.chambers.sc@gmail.com
Attorney For Appellant

12th June, 2026
Greenville, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF OCONEE

American Pharma Machinery, LLC,
Plaintiff,

Vs.

Clements Electrical, Inc, Alton
Frederick, Janet Gay Clements,
Jason Dix, Nicholas Behringer,
Sherry L. Burgess, Nicholson H.
Jerry, Francesco Majia Armando
Frank, Melissa C. Chastain, and
Jared Adam Pierce,
Defendants.

IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT
Civil Action No. 2022-CP-37-00108

CERTIFICATE OF SERVICE

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SC Court of Appeals

I, John E. Chambers, Jr., do hereby certify that on **12th June, 2026**, I have served the Oconee County Clerk of Court with the Notice of Appeal and Orders On Appeal in the above captioned action by electronic filing.

Parties Served:

Hon. Lisa Burton
Oconee County Clerk of Court
Rembert C. Dennis Building
415 South Pine Street
Walhalla, South Carolina 29691

By: **s/ John E. Chambers, Jr.**

John E. Chambers, Jr.

SC Bar No: 9027

Attorney For Appellant

JOHN E. CHAMBERS, JR.
ATTORNEY AT LAW

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TEL: 864-884-3340 | EMAIL: JOHN.CHAMBERS.SC@GMAIL.COM

June 12th 2026

In Re: American Pharma Machinery, LLC Vs. Clements Electrical, LLC, Et al.
LCT Case No. 2022-CP-00108

VIA ELECTRONIC FILING

Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
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SC Court of Appeals

Hon. Jenny Abbott Kitchings:

Enclosed please find for filing in the instant case the following:

- (1) Notice of Appeal**
- (2) Orders On Appeal**
- (3) Letter To LCT & Certificate of Service Filed In LCT**
- (4) Proof of Service (NOA & Orders on Appeal)**

Please do not hesitate to make contact with me if you have any questions or concerns regarding the instant case. Thank you.

Kindest regards:

s/ John E. Chambers, Jr.

John E. Chambers, Jr.
SC Bar No: 9027
Attorney For Appellant

cc: Howard E. Sutter, III, Esq.
Scott Giblin, Esq.
Everett A. Kindall, II, Esq.

JOHN E. CHAMBERS, JR.
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June 12th 2026

In Re: American Pharma Machinery, LLC Vs. Clements Electrical, LLC, Et al.
C/A No. 2022-CP-37-00108

VIA ELECTRONIC FILING

Honorable Lisa Burton
Oconee County Clerk of Court
415 South Pine Street
Walhalla, South Carolina 29691

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Hon. Lisa Burton:

Enclosed please find for filing in the above captioned case, the following:

- 1) Plaintiff American Pharma's NOA**
- 2) Orders on Appeal**
- 3) Certificate of Service**

Please do not hesitate to make contact with me if you have any questions or concerns regarding the instant case. Thank you.

Kindest regards:

s/ John E. Chambers, Jr.

John E. Chambers, Jr.
SC Bar No: 9027
Attorney For Appellant

cc: Howard E. Sutter, III, Esq.
Scott Giblin, Esq.
Everett A. Kindall, II, Esq.