

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

RECEIVED

Jul 27 2026

SC Court of Appeals

Danielle C. Brown, Respondent

v.

Crystal Brown Nwaneri, Appellant

Appellate Case No. 2025-002014

Trial Court Case No. 2023-CP-10-06212

RECORD ON APPEAL

Appellant Crystal Brown Nwaneri

INDEX TO RECORD ON APPEAL

The Record is organized chronologically by procedural stage to facilitate review.

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Documents are grouped by procedural stage for organizational purposes only and remain in substantially chronological order.

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER
ON PARTITION HEARING**

This matter came before the Court on August 25, 2025, at 2:00 P.M., for a hearing on Plaintiff's action for partition by sale of real property located at 8297 Delhi Road, North Charleston, SC 29406. Present at the hearing were Plaintiff Danielle C. Brown ("Plaintiff") and her counsel, Logan S. Davis, Esq. and S. Tyler Graves, Esq. of Graves & Davis, LLC. Defendant Crystal Brown Nwaneri ("Defendant") was not present at the hearing.

PROCEDURAL HISTORY AND SERVICE

The Court finds that appropriate notice was provided to Defendant to appear at the hearing. The record reflects that Plaintiff's counsel filed extensive exhibits along with its Amended Memorandum in Support of Partition by Sale to establish appropriate notice, including:

1. Service by publication in *The Post and Courier* newspaper on May 22, May 29, and June 5, 2024;
2. Multiple attempts at notice to Defendant's last known address at 17293 Oakwood Lodge Lane, Piney Point, MD 20674;

3. For the January 29, 2025 hearing: successful delivery on January 21, 2025 (FedEx tracking #771449779691) and attempted delivery requiring signature (FedEx tracking #771449731962);
4. For the August 25, 2025 hearing: successful delivery on August 15, 2025 (FedEx tracking #883502622602) and successful signed delivery on August 15, 2025 (FedEx tracking #883502697920);
5. Email notice to Defendant at the email address previously used for communications in this matter.

The Court confirmed that Defendant is in default pursuant to Rule 55(a), SCRPC, having been entered on September 17, 2024, and has failed to make an appearance in this case.

FINDINGS OF FACT

Based on the testimony and evidence presented at the hearing, the Court makes the following findings of fact:

1. Plaintiff and Defendant each own a fifty percent (50%) undivided interest, as tenants-in-common, in the subject property located at 8297 Delhi Road, North Charleston, SC 29406, TMS No.: 485-06-00-026 (the "Property");
2. The Property is not encumbered by any mortgage.
3. The subject Property is the Plaintiff and Defendant's childhood home;
4. Plaintiff made attempts to discuss the disposition of the subject Property with Defendant, but has never received a clear answer regarding Defendant's intentions;
5. Plaintiff is agreeable to selling her interest to Defendant at fair market value;
6. Plaintiff wishes the Property to be sold in the event Defendant does not wish to purchase Plaintiff's interest;

7. Plaintiff has incurred costs and expenses related to the ownership of the Property, including landscaping expenses totaling \$6,300.00 from 2019 to present;
8. Plaintiff has incurred attorney's fees and costs related to this partition action;
9. Plaintiff will obtain an appraisal to determine fair market value of the Property.

CONCLUSIONS OF LAW

1. This Court has jurisdiction over the subject matter and the parties to this action;
2. Partition is available as a matter of right to any co-tenant under S.C. Code Ann. § 15-61-10;
3. The Property is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act;
4. Defendant has been provided appropriate notice as required for the Court to proceed with ordering partition proceedings;
5. Defendant is in default pursuant to Rule 55(a), SCRCPP, having been entered on September 17, 2024, and has failed to make an appearance in this case.
6. Due process requires that Defendant be afforded an opportunity to purchase Plaintiff's interest before the Property is sold to third parties.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. Standing Order Application: The Standing Order in All Partition Actions dated December 20, 2007, is applicable to this case in order to protect the due process rights of Defendant regardless of her default status. A copy of the Court's Standing Order is incorporated herein as Exhibit A and made a part of this Order.

2. Election to Purchase: Defendant shall be granted an opportunity to elect to purchase Plaintiff's fifty percent (50%) interest in the Property, pursuant to the December 20, 2007 Standing Order.
3. Deadline for Election: Defendant shall have until September 26, 2025, to notify the Court and Plaintiff's counsel in writing of Defendant's decision to purchase Plaintiff's interest and the proposed terms of such purchase, if Defendant decides to do so.
4. Method of Notice: Any notice from Defendant shall be filed with the Court and served upon Plaintiff's counsel at the address of 1730 Central Park Road, Charleston, SC 29412.
5. Hearing on Election: A hearing is scheduled for October 6, 2025, at 1:00 P.M., at which time the Court will determine whether Defendant has elected to purchase the Property and, if so, will address the terms of such purchase.
6. Notice of Hearing: Plaintiff's counsel shall provide notice of the October 6, 2025 hearing to Defendant using the same methods of service as were used for the August 25, 2025 hearing.
7. Determination of Value: Plaintiff will obtain an appraisal to determine fair market value of the Property.
8. Preservation of Rights: This Order preserves Plaintiff's rights to seek partition by sale, reimbursement for expenses, and attorney's fees and costs.

[MASTER-IN-EQUITY'S SIGNATURE PAGE TO FOLLOW.]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Master/Order/Other

So Ordered

s/Mikell R. Scarborough 3062

Electronically signed on 2025-09-03 15:33:50 page 5 of 5

EXHIBIT A
Standing Order In All
Partition Actions

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON) IN THE MASTER IN EQUITY COURT
 FOR CHARLESTON COUNTY

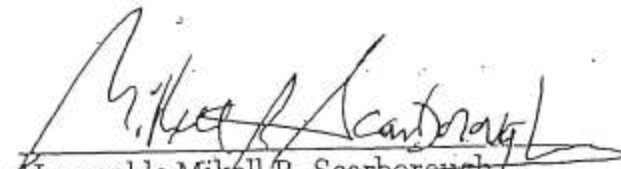
STANDING ORDER IN ALL PARTITION ACTIONS

This court is now regularly seeing partition actions in which the purpose of the action is the contemplated sale of the real estate contained therein. Therefore, pursuant to Section 15-61-25, 1976 SC Code of Laws, as Amended, (2007 Supp.), this court shall require Notice of the requirements of this statute to be served upon all parties in the action and upon all joint tenants or tenants in common. This statute states:

"The Court shall provide for the non-petitioning joint tenants or tenants in common who are interested in purchasing the property to notify the Court of that interest no later than ten (10) days prior to the date set for the trial of the case. The non-petitioning joint tenants or tenants in common shall be allowed to purchase the interests in the property as provided in this section whether default has been entered against them or not." 1976 SC Code of Laws, Section 15-61-25 (A).

This notice shall be served upon all parties and the required tenants in common at the time the Notice of Hearing is served herein. Proof of service of the Notice of Hearing and this Order providing Notice to the tenants of their rights in the property shall be required at the time of the hearing.

IT IS SO ORDERED!


 Honorable Mikell R. Scarborough
 Master in Equity for Charleston County

December 20, 2007
 Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**CONSENT MOTION
AND ORDER FOR CONTINUANCE**

YOU WILL PLEASE TAKE NOTICE that the Plaintiff, Danielle C. Brown (“Brown”), by and through her undersigned counsel, with consent of Defendant, Crystal Brown Nwaneri, hereby moves the Court for an Order continuing the partition hearing scheduled for January 29, 2025 at 3:00 PM, for good cause shown.

The basis for this motion is that the parties have been in communication and would like additional time to attempt finding a resolution in this case, inclusive of mediating the case. The parties have good cause for requesting this continuance and there will not be any prejudice or any undue delay in the progress of this case if the motion is granted. No other continuances have been requested in this case.

Based on the above, the parties respectfully request that the Court continue the case until a term of Court not before March 1, 2025, for good cause shown.

Based on the foregoing representations,

IT IS ORDERED, based on a finding of good and sufficient cause, that the case is continued pursuant to Rule 40(i)(1) of the South Carolina Rules of Civil Procedure beyond the hearing currently scheduled to begin January 29, 2025, and that the partition hearing not be placed on an active roster before March 1, 2025.

IT IS SO ORDERED.

Charleston, South Carolina
January 29, 2025

Charleston County Master in Equity

WE SO MOVE AND CONSENT:

GRAVES & DAVIS, LLC



Logan S. Davis, Esquire

S.C. Bar No. 104429

1730 Central Park Road

Charleston, South Carolina 29412

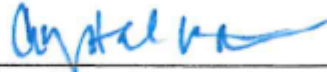
Phone: 843-805-4649

Email: ldavis@gravesdavis.com

Attorneys for Plaintiff

Danielle C. Brown

WE CONSENT:



By: Crystal Brown Nwaneri



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Continuance

So Ordered

s/Mikell R. Scarborough 3062

Electronically signed on 2025-01-29 15:23:50 page 4 of 4

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER OF REFERENCE TO
THE MASTER-IN-EQUITY**

UPON reading the Plaintiff's Motion for Reference to the Master-in-Equity, and upon consideration of same, and it being made to appear to my satisfaction that this matter involves a partition action to real property.

THEREFORE, IT IS ORDERED, ADJUDGED and DECREED that this case be, and the same is hereby, referred pursuant to SCRCP Rule 53 to The Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, to take testimony and issue a Final Decree, with any appeal from the Master to be directly to the South Carolina Supreme Court or the Court of Appeals.

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Master-in-Equity is given authority to hear any and all post-trial motions, including, but not limited to, motions under Rules 52, 59 and 60, SCRCP.

AND IT IS SO ORDERED!

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Referred to Master or Special Referee

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Electronically signed on 2024-09-19 11:25:09 page 2 of 2

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2024-09-17 09:26:14 page 2 of 2

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION AND ORDER FOR
SERVICE BY PUBLICATION**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, Danielle C. Brown (hereinafter referred to as the “Plaintiff”), by and through her undersigned counsel for purpose effectuating service upon the above-captioned Defendant (hereinafter referred to as “Defendant”) move before this Honorable Court, for an Order authorizing service by publication of the above referenced matter, on the basis that the Defendant still has not been personally served. The Plaintiff has not been able to effectuate service pursuant to ordinary means: personal service or substituted service, and upon information and belief, the Defendant is aware of this matter, has made no attempt to provide her whereabouts to any other parties and is actively endeavoring to evade service.

FACTS

1. On or about December 21, 2023, Plaintiff initiated the subject partition action by filing a Summons and Complaint in this Court.
2. Plaintiff obtained Defendant’s address from prior knowledge, current legal proceedings, and other public records.
3. Plaintiff hired ABC Legal, a company engaged in the business of performing skip-traces and serving legal documents, to serve the Summons and Complaint on Defendant.

4. ABC Legal attempted service on Defendant on January 10, 2024, January 12, 2024, January 14, 2024, and January 16, 2024. However, these attempts were unsuccessful.
5. ABC Legal returned a signed proof of non-service document which has been filed with this Court.
6. In an attempt to further investigate the location of Defendant, ABC Legal ran a skip trace on Defendant, which confirmed Defendant resides at the location where ABC Legal had attempted service of process on Defendant.
7. Further, ABC Legal or its representatives have spoke with the neighboring property owner(s) and confirmed Defendant lives at the location where ABC Legal had attempted service of process on Defendant.
8. ABC Legal again attempted to serve Defendant following the skip trace on March 4, 2024, March 10, 2024, March 13, 2024, and March 17, 2024.
9. On March 17, 2024, Timothy Allen, a representative of ABC Legal, spoke with an unknown individual who identified themselves as the resident of the location; however, the person refused to open the door.
10. ABC Legal returned a second signed proof of non-service document which has been filed with this Court.
11. To date the Defendant has not attempted to contact Plaintiff's attorney or process server.

APPLICABLE LAW

S.C. Code Ann. § 15-9-710 authorizes service of the summons be made by publication when, after due diligence, the person to be served cannot be found within the State and that fact appears by affidavit to the satisfaction of the court...and it in like manner appears that the cause of action exists against the defendant in respect to whom the service is to be made or that he is a

proper party to an action relating to real property in this state...when the subject of the action is real or personal property in this State and the defendant has or claims a lien or interest, actual or contingent, therein or the relief demanded consists wholly or partly in excluding the defendant from any interest or lien therein.

CONCLUSION OF LAW

Based on this Motion and the affidavits of non-service filed with this Court, which are incorporated herein by reference, I find that the Plaintiff is entitled to effectuate service by publication regarding Defendant.

WHEREFORE, Plaintiff moves this Court for an order of service by publication.

IT IS THEREFORE ORDERED, that Plaintiff is granted leave to effectuate service by publication pursuant to S.C. Code § 15-9-740 in the Post & Courier, a newspaper of common circulation in Charleston County.

_____, 2024.

Presiding Judge for Charleston County

I SO MOVE:

s/Logan S. Davis
Logan S. Davis, Esq.
Graves & Davis, LLC
125 Wappoo Creek Dr.
Bldg. E, Suite 102
Charleston, SC 29412
Phone: 843-805-4649
Facsimile: 843-620-1047
Ldavis@gravesdavis.com
Attorney for the Plaintiffs

Date: April 16, 2024



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Publication

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Electronically signed on 2024-04-18 12:46:55 page 4 of 4

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**SUMMONS
(Non-Jury, Partition)**

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to said Complaint upon Plaintiff or its counsel, S. Tyler Graves and Logan S. Davis, at 125 Wappoo Creek Drive, Building E, Suite 102, Charleston, South Carolina 29412, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to Answer the Complaint within the time aforesaid, Plaintiff will apply to the Court for the relief demanded in the Complaint.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**COMPLAINT
(Non-Jury, Partition)**

Plaintiff, Danielle C. Brown, by and through her undersigned counsel, alleges and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, Danielle C. Brown ("Plaintiff"), is a citizen and resident of Smyrna, Georgia.
2. Defendant, Crystal Brown Nwaneri ("Defendant") is a citizen and resident of Piney Point, Maryland.
3. The real property that is the subject of this action, and which Plaintiff and Defendant own together as tenants in common, is located in Charleston County, South Carolina.
4. This Court has jurisdiction over both the subject matter and parties to this action.
5. Venue in Charleston County, South Carolina is proper.

FACTUAL ALLEGATIONS

6. The preceding paragraphs are repeated as if set forth verbatim herein.
7. The real property subject to this action is located at 8297 Delhi Road, North Charleston, SC 29406 (the "Property").
8. The Property can more fully be described as

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

9. Plaintiff and Defendant are sisters, and the children of George Lee Brown.
10. George Lee Brown died intestate on April 9, 2018.
11. George Lee Brown owned the Property at the time of his death.
12. Plaintiff and Defendant were the sole heirs to the estate of George Lee Brown.
13. Plaintiff was appointed personal representative of the estate of George Lee Brown on September 30, 2021.
14. Plaintiff, in her capacity as personal representative, executed a deed of distribution to Plaintiff and Defendant on May 7, 2022. The deed of distribution was recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.
15. Accordingly, Plaintiff and Defendant each own an undivided fifty percent (50%) interest in the Property.
16. Upon information and belief, there is no mortgage encumbering the Property.
17. Plaintiff wishes to sell the Property.
18. Defendant refuses to sell the Property.

FOR A FIRST CAUSE OF ACTION
(Partition Action)

19. The preceding paragraphs are repeated as if set forth verbatim herein.

20. Pursuant to S.C. Code Ann. §§15-61-10, et. seq., partition of the Property is compellable between the Plaintiff and Defendant as joint tenants, subject to all rights of first refusal, appraisal, and notice as directed by law.

21. The Property does not constitute heirs' property and is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act.

22. Plaintiff is entitled to an order compelling partition of the Property by allotment or by sale as provided by law, with apportionment and division of the new sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests, and affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity commensurate with the parties' respective contributions and improvements towards the Property.

WHEREFORE, Plaintiff prays that this Honorable Court issue its Order:

- A. Compelling partition of the Property by allotment or by sale as provided by law, apportioning and dividing the net sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests and share, affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity as pled herein;
- B. Awarding Plaintiff's attorneys' fees and costs as provided by law; and
- C. All other such relief as may be just and proper.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

vs.

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF:
SUMMONS; COMPLAINT; NOTICE; LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: **17293 Oakwood Lodge Lane, Piney Point, MD 20674** and was unable to effect service for the following reasons:

1/10/2024 5:04 PM: There was no answer at the address.

1/10/2024 6:09 PM: There was no answer at the address.

1/12/2024 9:41 AM: There was no answer at the address. Heard young child say mommy. Waited no one came to the door

1/14/2024 11:18 AM: There was no answer at the address. White Lincoln navigator in driveway Maryland tags 6FA5205. Heard movement and voices. No one answered the door.

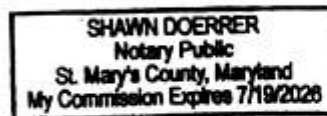
1/16/2024 11:55 AM: There was no answer at the address. Lights on. Vehicles in driveway. Rang door bell, knocked numerous times. No one would answer the door. Pictures uploaded of vehicles.

Date: 1/17/24

Jessica Lada
Jessica Lada

SUBSCRIBED AND SWORN to before me this 17th day of January, 2024.

Shawn Doerrer
NOTARY PUBLIC in and for the State of Maryland
My commission expires 07/19/2026



REF: REF-14540212
FOR: Graves & Davis LLC

PAGE 1 OF 1
ORIGINAL AFFIDAVIT OF
NON-SERVICE

Tracking #: 0122310143

IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

VS.

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF:

SUMMONS; COMPLAINT; NOTICE; LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: **17293 Oakwood Lodge Lane, Piney Point, MD 20674** and was unable to effect service for the following reasons:

3/4/2024 4:30 PM: Refused to answer the door. I spoke with a neighbor who says subject resides.

3/10/2024 5:01 PM: There was no answer at the address. I spoke with a neighbor who says subject resides.

3/13/2024 5:39 PM: Noise heard inside refused to answer door. I spoke with a neighbor who says subject resides.

3/17/2024 10:08 AM: I spoke with an individual who identified themselves as the resident. I spoke with a neighbor who says subject resides. Refused to open the door

Date: 3-25-24


Timothy Allen

SUBSCRIBED AND SWORN to before me this 25 day of MARCH, 2024


NOTARY PUBLIC in and for the State of Maryland
My commission expires 12-7-2024



Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 04-16-2024 10:24:58 AM.

Logan Davis - Notification transmitted on 04-16-2024 10:24:58 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 04-16-2024 10:24:33 AM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Document(s) Submitted: Service/Affidavit of Non Service

Service/Affidavit of Non Service

Filed by or on behalf of: Logan Steele Davis

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 04-16-2024 10:30:47 AM.

Logan Davis - Notification transmitted on 04-16-2024 10:30:47 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 04-16-2024 10:29:13 AM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Event(s):

Order/Order Cover Sheet \$25.00

Document(s) Submitted: Proposed Order/Publication

Filed by or on behalf of: Logan Steele Davis

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 04-18-2024 12:47:11 PM.

Logan Davis - Notification transmitted on 04-18-2024 12:47:11 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 04-18-2024 12:47:06 AM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Document(s) Submitted: Order/Publication Order/Publication

Filed by or on behalf of: Bonnie Campbell

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 06-17-2024 05:12:57 PM.

Logan Davis - Notification transmitted on 06-17-2024 05:12:57 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 06-17-2024 05:12:43 PM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Document(s) Submitted: Affidavit/Publication

Filed by or on behalf of: Logan Steele Davis

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT
CRYSTAL BROWN NWANERI**

The Plaintiff, by and through her undersigned counsel, hereby requests the Honorable Clerk of Court for an Entry of Default against Defendant Crystal Brown Nwaneri, pursuant to Rule 55(a) of the South Carolina Rules of Civil Procedure.

The basis of this Motion is that the Defendant Crystal Brown Nwaneri was served with the Lis Pendens, Summons and Complaint on June 5, 2024 and has failed to file an Answer or other responsive pleading.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 16, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

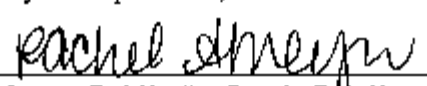
C/A No.: 2023-CP-10-06212

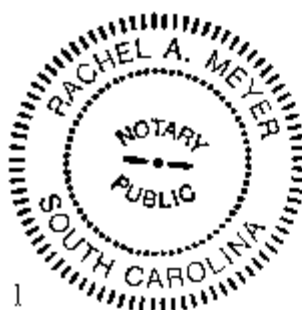
AFFIDAVIT OF DEFAULT

PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is an attorney at law, and represents the Plaintiff herein; that the Lis Pendens, Summons and Complaint in this action were duly served on the Defendant Crystal Brown Nwaneri, on June 5, as it appears from the proof of the same on record with the Clerk of Court; that more than thirty (30) days have elapsed since the completion of said service upon the Defendant, and that the Defendant is now in default, no answer having been served by Defendant, nor her attorney. Plaintiff requests an Entry of Default against Defendant Crystal Brown Nwaneri.


Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.


Notary Public for South Carolina
My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

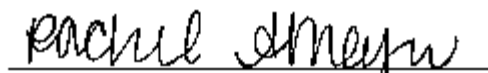
**AFFIDAVIT OF
NON-MILITARY SERVICE**

PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is familiar with the provisions of 50 USC, App. §520, Soldiers' and Sailors' Civil Relief Act of 1940, and to induce the Court to enter a default judgment against Defendant Crystal Brown Nwaneri represents to this Court, that from review of the file in this matter, the said Defendant does not appear to be in the Military Service of the United States and is not entitled to protection of the Soldiers' and Sailors' Civil Relief Act of 1940 nor any amendments thereof.



Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.



Notary Public for South Carolina

My commission Expires: 01-27-2031



Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 09-16-2024 03:07:28 PM.

Logan Davis - Notification transmitted on 09-16-2024 03:07:28 PM.

The Notice below is AMENDED
Not all documents within the filing were approved.

Document(s) Filed: Affidavit/Default
Affidavit/Non Military Service
Motion/Entry of Default
Proposed Order/Entry of Default
—

******* IMPORTANT NOTICE - READ THIS INFORMATION *******
NOTICE OF ELECTRONIC FILING [NEF]
—

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 09-16-2024 03:06:50 PM

Court: CIRCUIT COURT
Common Pleas
Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Event(s):

Order/Order Cover Sheet \$25.00

Document(s) Submitted: Affidavit/Default
Affidavit/Non Military Service
Motion/Entry of Default
Proposed Order/Entry of Default

Filed by or on behalf of: Logan Steele Davis

This notice was automatically generated by the Court's auto-notification system.
—

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown
Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 09-17-2024 11:54:23 AM.

Logan Davis - Notification transmitted on 09-17-2024 11:54:23 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 09-17-2024 11:54:17 AM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Document(s) Submitted: Order/Entry of Default as to Defendant
Order/Entry of Default

Filed by or on behalf of: Jennifer B. Mccoy

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION FOR REFERENCE TO THE
MASTER-IN-EQUITY**

Plaintiff commenced this action in equity to partition by sale certain real property located in Charleston County, South Carolina. Plaintiff hereby moves this Court to issue an Order of Reference, pursuant to Rule 53(b), SCRCP, referring this equitable proceeding to the Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, for the purpose of receiving evidence and with all appeals to be made directly to the South Carolina Court of Appeals.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 17, 2024
Charleston, South Carolina

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 09-17-2024 01:27:15 PM.

Logan Davis - Notification transmitted on 09-17-2024 01:27:15 PM.

The Notice below is AMENDED
Not all documents within the filing were approved.

Document(s) Filed: Motion/Refer to Master or Special Referee
Proposed Order/Referred to Master or Special Referee

—

******* IMPORTANT NOTICE - READ THIS INFORMATION *******
NOTICE OF ELECTRONIC FILING [NEF]

—

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 09-17-2024 01:24:43 PM

Court: CIRCUIT COURT
Common Pleas
Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Event(s):

Order/Order Cover Sheet \$25.00

Document(s) Submitted: Motion/Refer to Master or Special Referee
Proposed Order/Referred to Master or Special Referee

Filed by or on behalf of: Logan Steele Davis

This notice was automatically generated by the Court's auto-notification system.

—

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown
Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 09-19-2024 11:25:31 AM.

Logan Davis - Notification transmitted on 09-19-2024 11:25:30 AM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 09-19-2024 11:25:24 AM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Document(s) Submitted: Order/Referred to Master or Special Referee
Order/Referred to Master or Special Referee

Filed by or on behalf of: Bonnie Campbell

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MEMORANDUM IN SUPPORT
OF PARTITION BY SALE**

The Plaintiff, by and through her undersigned counsel, hereby submits for the Court's consideration her Memorandum in Support of Partition by Sale, in advance of the subject Partition Hearing scheduled in this matter for January 29, 2025 at 3:00 P.M.

INTRODUCTION

This matter comes before the Court on Plaintiff's action for partition by sale of that certain residential real property located at 8297 Delhi Road, North Charleston, SC 29406 (the "Property"). The Property is currently owned as tenants in common between Plaintiff Danielle C. Brown and Defendant Crystal Brown Nwaneri, with each holding an undivided fifty percent (50%) interest.

STATEMENT OF FACTS

1. The subject Property was originally owned by George Lee Brown, who died intestate on April 9, 2018.

2. Upon his death, the Property passed to his two children, Plaintiff and Defendant, as his sole heirs at law.

3. Plaintiff was appointed personal representative of her father's estate (Estate No. 2021ES1000886) on September 30, 2021.

4. On May 7, 2022, Plaintiff, in her capacity as personal representative, executed a deed of distribution conveying the Property to herself and Defendant. This deed was recorded on June 2, 2022, in Book 1113, at page 766 of the Charleston County Register of Deeds. A copy of the deed of distribution is attached hereto as Exhibit A.

5. Plaintiff has expressed her desire to sell the Property, but Defendant refuses to cooperate with such sale.

6. The Property is not encumbered by any mortgage.

7. Defendant was properly served but has failed to answer or otherwise appear in this action.

8. The Court has entered default against Defendant pursuant to Rule 55(a), SCRPC on September 17, 2024. *See* Exhibit B.

SERVICE AND NOTICE TO DEFENDANT

The record demonstrates diligent efforts to serve and notify Defendant of these proceedings:

9. After initial attempts at personal service were unsuccessful, Plaintiff proceeded with service by publication in The Post and Courier newspaper.

10. Publication was properly made on May 22, May 29, and June 5, 2024, as evidenced by the Affidavit of Publication sworn to on June 5, 2024. *See* Exhibit C.

11. Additionally, notices of hearing were sent to Defendant's last known address at 17293 Oakwood Lodge Lane, Piney Point, MD 20674. *See* Exhibit D.

12. One notice was successfully delivered on January 21, 2025 (FedEx tracking #771449779691). *See* Exhibit E.

13. A second notice requiring signature was attempted multiple times but Defendant refused delivery (FedEx tracking #771449731962, with delivery attempts on January 16, 17, and 21, 2025). *See Exhibit F.*

14. These multiple methods of service and notice demonstrate Plaintiff's thorough efforts to inform Defendant of these proceedings, satisfying both legal requirements and principles of due process.

ARGUMENT

I. PARTITION IS APPROPRIATE AS A MATTER OF LAW

Under South Carolina law, partition is available as a matter of right to any co-tenant. S.C. Code Ann. § 15-61-10. Upon information and belief, the Property is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act. Further, Defendant has been provided the appropriate notice required for the Court to proceed with ordering a partition by sale.

II. REIMBURSEMENT SHOULD BE AWARDED TO PLAINTIFF

When one cotenant pays more than their proportionate share of expenses necessary to preserve the property, they are entitled to contribution from their cotenant. *See Shumaker v. Shumaker*, 234 S.C. 421, 108 S.E.2d 682 (1959). Here, Plaintiff has solely maintained the Property's grounds by paying Phase II Enterprises (aka Phase II Lawn Care) for regular landscaping services from 2019 to present. *See Exhibit G.* These necessary maintenance expenses total \$6,300.00, of which Defendant's proportionate 50% share is \$3,150.00.

Additionally, South Carolina law explicitly provides for the award of attorney's fees and costs in partition actions. Pursuant to S.C. Code Ann. § 15-61-110, "The court of common pleas may fix attorneys' fees in all partition proceedings and, as may be equitable, assess such fees against any or all of the parties in interest." Given Defendant's default and refusal to cooperate in

the sale of the Property, requiring this action, it is equitable that Defendant bear the costs and attorney's fees incurred in bringing this partition action. Plaintiff submits an Affidavit of Attorney's Fees as Exhibit H.

CONCLUSION

Based on the foregoing, Plaintiff respectfully requests that this Court:

1. Order partition by sale of the Property;
2. Order reimbursement to Plaintiff in the amount of \$3,150.00 from Defendant's share of the sale proceeds for landscaping expenses;
3. Order Defendant to pay all attorney's fees and costs pursuant to S.C. Code Ann. § 15-61-110; and
4. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

January 27, 2025
Charleston, South Carolina

EXHIBIT A

Deed of Distribution

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON
IN THE MATTER OF:
GEORGE LEE BROWN
(Decedent)

)
)
)
)
)
)
) IN THE PROBATE COURT
DEED OF DISTRIBUTION
(Real Property Only)
NOT A WARRANTY DEED
CASE NUMBER: 2021ES1000886



PGS:

4

BP1113766

The undersigned states as follows:

Decedent died on APRIL 9, 2018; and probate of the Estate is being administered in the Probate Court for CHARLESTON County, South Carolina, in File #2021ES1000886.

I/We was/were appointed Personal Representative (s) on SEPTEMBER 30, 2021.

Decedent owned real property described as follows:

Tax Map Number: 514-10-00-138

Street/Property Address: 3RD STREET, CHARLESTON COUNTY, SC

Legal Description: SEE EXHIBIT A

☐ Additional sheet(s) for additional property(ies) is attached (check if applicable)

This transfer is made pursuant to:

- ☐ Decedent's Will
☒ Intestacy Statute: SCPC 62-2-103
☐ Private Family Agreement: SCPC 62-3-912
☐ Disclaimer by: _____
☐ Probate Court Order Issued on _____
☐ Other: _____

PMC Law Firm
504 W. 5TH North Street
Summerville, SC 29483

In accordance with the laws of the State of South Carolina, the Personal Representative(s) does/do hereby release all of the Personal Representative's(s') right, title and interest, including statutory and/or testamentary powers, over the real property described to the beneficiaries named below:

Name: DANIELLE C. BROWN
Address: 1006 KENNINGHALL DR.
SMYRNA, GA 30082

Name: CRYSTAL BROWN NWANERI
Address: 17293 OAKWOOD LODGE LN.
PINEY POINT, MD 20674

Name: _____
Address: _____

Name: _____
Address: _____

☐ Additional sheet(s) for names of additional beneficiaries is attached (check, if applicable)

IN WITNESS WHEREOF the undersigned, as Personal Representative(s) of the above Estate, has executed this Deed of Distribution, on this _____ day of _____, 2022.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF

Witness: _____

Print Name: ROY GREEN

Witness: _____

Print Name: Lazagna Robinson

Estate of: GEORGE LEE BROWN

Signature of Personal
Representative: _____

Print Name: DANIELLE C. BROWN

If applicable,
Signature of Co-Personal
Representative: _____

Print Name: _____

STATE OF Georgia }

ACKNOWLEDGMENT

COUNTY OF Cobb

I, PREMCHAND KODALI

, _____, Notary Public, a notary for the State of South Carolina do hereby certify that DANIELLE C. BROWN, as
Personal Representative(s) of the Estate of GEORGE LEE BROWN, personally appeared before me this day and
acknowledged the due execution of the foregoing Deed of Distribution.

Witness my hand and seal this the 7 day of May, 2022.

Premchand Kodali
(Signature of Notary Public)
PREMCHAND KODALI
(Print name of Notary Public)
Notary Public for State of Georgia
My Commission Expires: 10/18/2022



Note: It is recommended that an attorney prepare this document and determine if a title examination is necessary.

Exhibit A

ALL that lot, of land situate, lying, and being in Christ Church Parish, County of Charleston and State aforesaid known as lot one hundred and ninety-five in Christ Church Parish, Charleston County and State aforesaid being the same lot conveyed to Hardy Green by the Charleston Land Company on the second day of January 1914 and recorded in the Office of the Register of Deeds for Charleston County August 20, 1917 in Book U-28 page three.

Being the same property conveyed to George Lee Brown by deed of Joseph Green dated April 20, 1988 and recorded on June 9, 1989 in the Office of the Register of Deeds for Charleston County in Book A185, Page 433.

RECORDER'S PAGE

NOTE: This page **MUST** remain
with the original document

**Filed By:**

PMC LAW FIRM
504 W 5TH NORTH ST

SUMMERVILLE SC 29483

RECORDED

Date: June 2, 2022

Time: 11:10:56 AM

Book

Page

DocType

1113

766

Deed/Dist

Michael Miller, Register
Charleston County, SC

MAKER:

BROWN GEORGE L EST

RECIPIENT:

BROWN DANIELLE C AL

Note:

of Pages: 4

Recording Fee	\$ 15.00
State Fee	\$ -
County Fee	\$ -
Extra Pages	\$ -
Postage	\$ -
Chattel	\$ -
TOTAL	\$ 15.00

Original Book:

Original Page:

AUDITOR STAMP HERE

RECEIVED From ROD

Aug 03, 2022

Peter J. Tecklenburg

Charleston County Auditor

PID VERIFIED BY ASSESSOR

REP JBA

DATE 08/04/2022

DRAWER 8
CLERK ANF



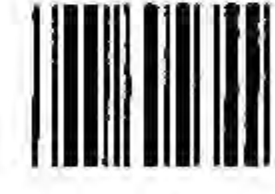
1113
Book



766
Page



06/02/2022
Recorded Date



4
Pgs



Original Book



Original Page



D
Doc Type



11:10:56
Recorded Time

EXHIBIT B
Order for Entry
of Default

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2024-09-17 09:26:14 page 2 of 2

EXHIBIT C
Affidavit of Publication

Logan Davis Graves & Davis LLC
125E Wappoo Creek Drive, Suite 102
CHARLESTON SC 29412

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina

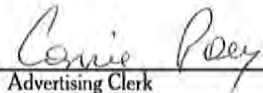
County of Charleston

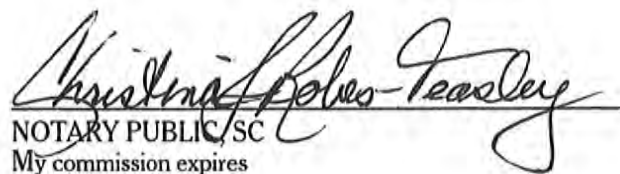
Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of appeared in the issues of said newspaper Post and Courier on the following day(s):
05/22/24, 05/29/24, 06/05/24

JUN 05 2024

Subscribed and sworn to before me this:

5th day of June, 2024


Advertising Clerk


NOTARY PUBLIC, SC
My commission expires

CHRISTINA J. ROBES-TEASLEY
Notary Public
State of South Carolina
My Commission Expires Mar 15, 2032

STATE OF
SOUTH CAROLINA
COUNTY OF
CHARLESTON
IN THE
COURT OF
COMMON PLEAS
FOR THE
NINTH JUDICIAL
CIRCUIT
C/A No.:
2023-CP-10-06212
SUMMONS
(Non-Jury, Partition)
DANIELLE C. BROWN,
Plaintiff,

v.
CRYSTAL BROWN
NWANERI,
Defendant.
TO THE DEFENDANT
ABOVE NAMED:
YOU ARE HEREBY
SUMMONED and required
to answer the Complaint in
this action, a copy of which
is hereby served upon you,
and to serve a copy of your
Answer to said Complaint
upon Plaintiff or its coun-
sel, S. Tyler Graves and
Logan S. Davis, at 125
Wappoo Creek Drive,
Building E, Suite 102,
Charleston, South Carolina
29412, within thirty (30)
days after service hereof,
exclusive of the day of such
service, and if you fail to
Answer the Complaint
within the time aforesaid,
Plaintiff will apply to the
Court for the relief
demanded in the
Complaint.
Respectfully submitted,
GRAVES & DAVIS, LLC
s/ Logan S. Davis
Logan S. Davis, Esq.
(S.C. Bar # 104429)
S. Tyler Graves, Esq.
(S.C. Bar # 103173)
125E Wappoo Creek Dr.,
Ste. 102
Charleston, South Carolina
29412
P: 843-805-4649 /
F: 843-620-1047
ldavis@gravesdavis.com
tgraves@gravesdavis.com
Attorneys for Plaintiff
December 21, 2023
Charleston, South Carolina
AD# 2070381

EXHIBIT D

Notice of Hearing FedEx tracking #771449779691

Notice of Hearing FedEx tracking #771449731962

ORIGIN ID: RBWA (843) 805-4649
GRAVES DAVIS LLC

SHIP DATE: 15JAN25
ACTWGT: 0.50 LB
CAD: 250649294/NET 4820

1730 CENTRAL PARK ROAD

CHARLESTON, SC 29412

UNITED STATES US

BILL SENDER

TO CRYSTAL BROWN NWANERI

17293 OAKWOOD LODGE LANE

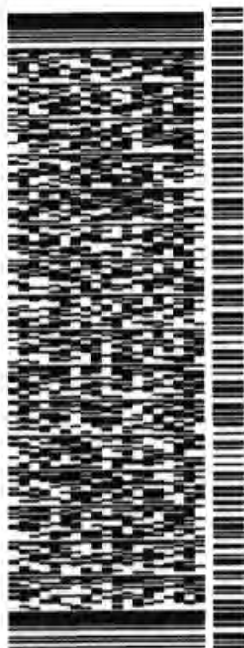
PINEY POINT MD 20674

(843) 805-4649

REF:

PO:

DEPT:



J251924121781uv

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GRAVES & DAVIS

Attorneys at Law

LOCATION
1730 Central Park Road
Charleston, SC 29412

ATTORNEYS
Tyler Graves, *Attorney* (SC)
Logan Davis, *Attorney* (SC)
Harrison Benefield, *Attorney* (SC) (GA)
Lindsay Barton, *Attorney* (SC)
Seth Manaker, *Of Counsel* (SC)

CONTACT
P: (843) 805-4649
F: (843) 620-1047

January 15, 2025

SENT VIA FEDEX

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
Piney Point, MD 20674

Re: Danielle C. Brown v. Crystal Brown Nwaneri
Case No.: 2023-CP-10-06212, Master-in-Equity Court for Charleston County, South Carolina

Dear Ms. Nwaneri:

Pursuant to the South Carolina Rules of Civil Procedure, enclosed please find a Notice of Hearing in the above-referenced matter.

As a courtesy, we are also providing you with copies of all filings of record in this case, which include:

1. Summons and Complaint
2. Notice
3. Lis Pendens
4. Affidavits of Non-Service
5. Order of Publication
6. Motion of Entry of Default and related affidavits
7. Order for Entry of Default
8. Order of Reference

Please review these documents carefully. If you have any questions about your legal rights or obligations, you may wish to consult with an attorney.

Sincerely,


Logan S. Davis, Esq.
1730 Central Park Road
Charleston, SC 29412
Phone: (843) 805-4649
Fax: (843) 620-1047
Ldavis@gravesdavis.com

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

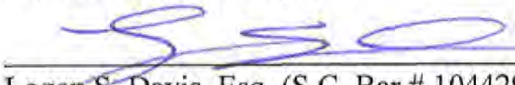
NOTICE OF HEARING

TO: DEFENDANT CRYSTAL BROWN NWANERI

YOU WILL PLEASE TAKE NOTICE that a partition hearing in this matter will be held on January 29, 2025 at 3:00 PM before the Honorable Mikell R. Scarborough, Master-In-Equity/Special Referee for Charleston County, at the Charleston County Judicial Center, 100 Broad Street, Suite 266, Charleston, SC 29401.

Respectfully submitted,

GRAVES & DAVIS, LLC


Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
tgraves@gravesdavis.com
ldavis@gravesdavis.com
Attorneys for Plaintiff

January 15, 2025
Charleston, South Carolina



Charleston County

Court Rosters

Pending Cases Search Clerk of Court Home Return To Roster Selection Jury & Non Jury Trial Roster Clerk of Court Chat

Court Agency	10003	Judge	Scarborough	Roster Description	Master in Equity Docket for January 29, 2025
Roster Type	Master's Hearings	Roster Begin Date	01/29/2025	Roster End Date	01/29/2025
Roster Id	2449	Roster Begin Time	10:00 AM		

Attorney Bar Number		Case #		Filed From		Filed Thru		Search		Print Roster	
#	Scheduled Date	Start Time	Duration Hrs:Mins	Description	Filing Party	Filed Date	Case / Case Caption	Sub Type	Tax Map	Plaintiff Attorney	Defendant
1	01/29/2025	10:00 AM	1:0	Master/Damages Hearing-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kenneth L (843) 8E
2	01/29/2025	10:00 AM		Master/Motion to Dismiss-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kenneth L (843) 8E
3	01/29/2025	11:00 AM	1:0	Master/Partition Hearing-Jan. 29 at 11:00	Letisha Jackson Adams-PLT	12/31/2024	2024CP1001100 Letisha Jackson Adams VS Lamar D Jackson , defendant, et al	Partition 440	5350400032	J. Christopher Lanning (843) 766-5576	Constance L. (843) 57 Ittrich, J. J (843) 2C
4	01/29/2025	2:00 PM	1:0	Master/Valuation Hearing-Jan. 29 at 2:00	Ada Bennett-PLT	12/31/2024	2019CP1000395 Ada Bennett , plaintiff, et al VS Edward Meyers , defendant, et al	Real Prop/Other 499	5830000055 5830000065 5830000077	Willie Bruce Heyward (843) 225-8754 John Fulton Knobeloch (843) 884-3670	Kelvin Mai (843) 57 Thomas B (843) 24 Kyle Var (843) 7E
5	01/29/2025	3:00 PM	1:0	Master/Partition Hearing-Jan. 29 at 3:00	Danielle C Brown-PLT	12/31/2024	2023CP1006212 Danielle C Brown VS Crystal Brown Nwaneri	Partition 440	9850600026	Logan Steele Davis (843) 860-8969 Stephen Tyler Graves (843) 727-5741	

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**SUMMONS
(Non-Jury, Partition)**

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to said Complaint upon Plaintiff or its counsel, S. Tyler Graves and Logan S. Davis, at 125 Wappoo Creek Drive, Building E, Suite 102, Charleston, South Carolina 29412, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to Answer the Complaint within the time aforesaid, Plaintiff will apply to the Court for the relief demanded in the Complaint.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**COMPLAINT
(Non-Jury, Partition)**

Plaintiff, Danielle C. Brown, by and through her undersigned counsel, alleges and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, Danielle C. Brown ("Plaintiff"), is a citizen and resident of Smyrna, Georgia.
2. Defendant, Crystal Brown Nwaneri ("Defendant") is a citizen and resident of Piney Point, Maryland.
3. The real property that is the subject of this action, and which Plaintiff and Defendant own together as tenants in common, is located in Charleston County, South Carolina.
4. This Court has jurisdiction over both the subject matter and parties to this action.
5. Venue in Charleston County, South Carolina is proper.

FACTUAL ALLEGATIONS

6. The preceding paragraphs are repeated as if set forth verbatim herein.
7. The real property subject to this action is located at 8297 Delhi Road, North Charleston, SC 29406 (the "Property").
8. The Property can more fully be described as

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

9. Plaintiff and Defendant are sisters, and the children of George Lee Brown.
10. George Lee Brown died intestate on April 9, 2018.
11. George Lee Brown owned the Property at the time of his death.
12. Plaintiff and Defendant were the sole heirs to the estate of George Lee Brown.
13. Plaintiff was appointed personal representative of the estate of George Lee Brown on September 30, 2021.
14. Plaintiff, in her capacity as personal representative, executed a deed of distribution to Plaintiff and Defendant on May 7, 2022. The deed of distribution was recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.
15. Accordingly, Plaintiff and Defendant each own an undivided fifty percent (50%) interest in the Property.
16. Upon information and belief, there is no mortgage encumbering the Property.
17. Plaintiff wishes to sell the Property.
18. Defendant refuses to sell the Property.

FOR A FIRST CAUSE OF ACTION
(Partition Action)

19. The preceding paragraphs are repeated as if set forth verbatim herein.

20. Pursuant to S.C. Code Ann. §§15-61-10, et. seq., partition of the Property is compellable between the Plaintiff and Defendant as joint tenants, subject to all rights of first refusal, appraisal, and notice as directed by law.

21. The Property does not constitute heirs' property and is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act.

22. Plaintiff is entitled to an order compelling partition of the Property by allotment or by sale as provided by law, with apportionment and division of the new sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests, and affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity commensurate with the parties' respective contributions and improvements towards the Property.

WHEREFORE, Plaintiff prays that this Honorable Court issue its Order:

- A. Compelling partition of the Property by allotment or by sale as provided by law, apportioning and dividing the net sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests and share, affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity as pled herein;
- B. Awarding Plaintiff's attorneys' fees and costs as provided by law; and
- C. All other such relief as may be just and proper.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

NOTICE

(S.C. Code Ann. §15-61-25)

TO THE DEFENDANT ABOVE-NAMED:

As a non-petitioning party/joint tenant/tenant in common in this action, this notice is provided pursuant to Section 15-61-2S, South Carolina Code of Laws. Please review the below and take note of all rights, responsibilities, and timeframes for performance and notices to the Court should you elect to exercise the rights so stated:

SECTION 15-61-25. RIGHT OF FIRST REFUSAL OF JOINT TENANT OR TENANT IN COMMON TO PURCHASE PROPERTY PRIOR TO PARTITION; PROCEDURE.

- (A) For the purposes of this section, "joint tenants and tenants in common" include heirs or devisees. Upon the filing of a petition for partition of real property owned by joint tenants or tenants in common, the court shall provide for the non-petitioning joint tenants or tenants in common who are interested in purchasing the property to notify the court of that interest no later than ten days prior to the date set for the trial of the case. The non-petitioning joint tenants or tenants in common shall be allowed to purchase the interests in the property as provided in this section whether default has been entered against them or not.
- (B) In the circumstances described in subsection (A) of this section, and in the event the parties cannot reach agreement as to the price, the value of the interest or interests to be sold shall be determined by one or more competent real estate appraisers, as the court shall approve, appointed for that purpose by the court. The appraisers appointed pursuant to this section shall make their report in writing to the court within thirty days after their appointment. The costs of the appraisers appointed pursuant to this section shall be taxed as a part of the cost of court to those seeking to purchase the interests of the joint tenants or tenants in common petitioning to sell their interest in the property described in the petition for partition.

- (C) In the event that the petitioning joint tenants or tenants in common object to the value of the interests as determined by the appointed appraisers, those joint tenants or tenants in common shall have ten days from the date of filing of the report to file written notice of objection to the report and request a hearing before the court on the value. An evidentiary hearing limited to the proposed valuation of the interests of the petitioning joint tenants or tenants in common shall be conducted, and an order as to the valuation of the interests of the petitioning joint tenants or tenants in common shall be issued.
- (D) After the valuation of the interest in property is completed as provided in subsection (B) or (C) of this section, the nonpetitioning joint tenants or tenants in common seeking to purchase the interests of those filing the petition shall have forty-five days to pay into the court the price set as the value of those interests to be purchased. Upon the payment and approval of it by the court, the court shall execute and deliver or cause to be executed and delivered the proper instruments transferring title to the purchasers.
- (E) In the event that the nonpetitioning joint tenants or tenants in common fail to pay the purchase price as provided in subsection (D) of this section, the court shall proceed according to its traditional practices in partition sales.

HISTORY: 2006 Act No. 302, Section 1, eff May 25, 2006, applicable to all petitions for partition filed after that date.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023
Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

LIS PENDENS

NOTICE IS HEREBY GIVEN that an action will be commenced and is pending in this Court upon the Complaint of the Plaintiff above-named against the above-named Defendant. Plaintiff seeks equitable partition of the property as provided in Section 15-61-10, et seq., South Carolina Code of Laws, 1976, as amended, together with such incidental relief as may be provided in the statutes and case law of the State of South Carolina.

At the time of filing this notice, the property affected by this action is located in Charleston County, State of South Carolina, and described as follows:

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

Reference to said deed is craved.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

VS:

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF
SUMMONS, COMPLAINT; NOTICE, LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

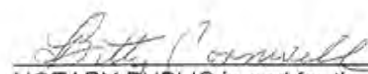
Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: 17293 Oakwood Lodge Lane, Piney Point, MD 20674 and was unable to effect service for the following reasons:

- 3/4/2024 4:30 PM: Refused to answer the door. I spoke with a neighbor who says subject resides.
- 3/10/2024 5:01 PM: There was no answer at the address. I spoke with a neighbor who says subject resides.
- 3/13/2024 5:39 PM: Noise heard inside refused to answer door. I spoke with a neighbor who says subject resides.
- 3/17/2024 10:08 AM: I spoke with an individual who identified themselves as the resident. I spoke with a neighbor who says subject resides. Refused to open the door

Date: 3-25-24


Timothy Allen

SUBSCRIBED AND SWORN to before me this 25 day of March, 2024


NOTARY PUBLIC in and for the State of Maryland
My commission expires 12-7-2024



IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

vs.

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF:

SUMMONS; COMPLAINT; NOTICE; LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: **17293 Oakwood Lodge Lane, Piney Point, MD 20674** and was unable to effect service for the following reasons:

1/10/2024 5:04 PM: There was no answer at the address.

1/10/2024 6:09 PM: There was no answer at the address.

1/12/2024 9:41 AM: There was no answer at the address. Heard young child say mommy. Waited no one came to the door

1/14/2024 11:18 AM: There was no answer at the address. White Lincoln navigator in driveway Maryland tags 6FA5205. Heard movement and voices. No one answered the door.

1/16/2024 11:55 AM: There was no answer at the address. Lights on. Vehicles in driveway. Rang door bell, knocked numerous times. No one would answer the door. Pictures uploaded of vehicles.

Date: 1/17/24

Jessica Lada
Jessica Lada

SUBSCRIBED AND SWORN to before me this 17th day of January, 2024.

Shawn Doerrer
NOTARY PUBLIC in and for the State of Maryland
My commission expires 07/19/2026

SHAWN DOERRER
Notary Public
St. Mary's County, Maryland
My Commission Expires 7/19/2026

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION AND ORDER FOR
SERVICE BY PUBLICATION**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, Danielle C. Brown (hereinafter referred to as the "Plaintiff"), by and through her undersigned counsel for purpose effectuating service upon the above-captioned Defendant (hereinafter referred to as "Defendant") move before this Honorable Court, for an Order authorizing service by publication of the above referenced matter, on the basis that the Defendant still has not been personally served. The Plaintiff has not been able to effectuate service pursuant to ordinary means: personal service or substituted service, and upon information and belief, the Defendant is aware of this matter, has made no attempt to provide her whereabouts to any other parties and is actively endeavoring to evade service.

FACTS

1. On or about December 21, 2023, Plaintiff initiated the subject partition action by filing a Summons and Complaint in this Court.
2. Plaintiff obtained Defendant's address from prior knowledge, current legal proceedings, and other public records.
3. Plaintiff hired ABC Legal, a company engaged in the business of performing skip-traces and serving legal documents, to serve the Summons and Complaint on Defendant.

4. ABC Legal attempted service on Defendant on January 10, 2024, January 12, 2024, January 14, 2024, and January 16, 2024. However, these attempts were unsuccessful.
5. ABC Legal returned a signed proof of non-service document which has been filed with this Court.
6. In an attempt to further investigate the location of Defendant, ABC Legal ran a skip trace on Defendant, which confirmed Defendant resides at the location where ABC Legal had attempted service of process on Defendant.
7. Further, ABC Legal or its representatives have spoke with the neighboring property owner(s) and confirmed Defendant lives at the location where ABC Legal had attempted service of process on Defendant.
8. ABC Legal again attempted to serve Defendant following the skip trace on March 4, 2024, March 10, 2024, March 13, 2024, and March 17, 2024.
9. On March 17, 2024, Timothy Allen, a representative of ABC Legal, spoke with an unknown individual who identified themselves as the resident of the location; however, the person refused to open the door.
10. ABC Legal returned a second signed proof of non-service document which has been filed with this Court.
11. To date the Defendant has not attempted to contact Plaintiff's attorney or process server.

APPLICABLE LAW

S.C. Code Ann. § 15-9-710 authorizes service of the summons be made by publication when, after due diligence, the person to be served cannot be found within the State and that fact appears by affidavit to the satisfaction of the court...and it in like manner appears that the cause of action exists against the defendant in respect to whom the service is to be made or that he is a

proper party to an action relating to real property in this state...when the subject of the action is real or personal property in this State and the defendant has or claims a lien or interest, actual or contingent, therein or the relief demanded consists wholly or partly in excluding the defendant from any interest or lien therein.

CONCLUSION OF LAW

Based on this Motion and the affidavits of non-service filed with this Court, which are incorporated herein by reference, I find that the Plaintiff is entitled to effectuate service by publication regarding Defendant.

WHEREFORE, Plaintiff moves this Court for an order of service by publication.

IT IS THEREFORE ORDERED, that Plaintiff is granted leave to effectuate service by publication pursuant to S.C. Code § 15-9-740 in the Post & Courier, a newspaper of common circulation in Charleston County.

_____, 2024.

Presiding Judge for Charleston County

I SO MOVE:

s/Logan S. Davis
Logan S. Davis, Esq.
Graves & Davis, LLC
125 Wappoo Creek Dr.
Bldg. E, Suite 102
Charleston, SC 29412
Phone: 843-805-4649
Facsimile: 843-620-1047
Ldavis@gravesdavis.com
Attorney for the Plaintiffs

Date: April 16, 2024



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Publication

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Logan Davis Graves & Davis LLC
125E Wappoo Creek Drive, Suite 102
CHARLESTON SC 29412

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina

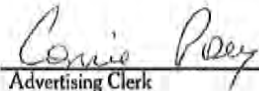
County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of appeared in the issues of said newspaper Post and Courier on the following day(s):
05/22/24, 05/29/24, 06/05/24

JUN 05 2024

Subscribed and sworn to before me this:

5th day of June, 2024


Advertising Clerk


NOTARY PUBLIC, SC
My commission expires

STATE OF
SOUTH CAROLINA
COUNTY OF
CHARLESTON
IN THE
COURT OF
COMMON PLEAS
FOR THE
NINTH JUDICIAL
CIRCUIT
C/A No.:
2023-CP-10-06212
SUMMONS
(Non-Jury, Partition)
DANIELLE C. BROWN,
Plaintiff,

v.
CRYSTAL BROWN
NWANERI,
Defendant.
TO THE DEFENDANT
ABOVE NAMED:
YOU ARE HEREBY
SUMMONED and required
to answer the Complaint in
this action, a copy of which
is hereby served upon you,
and to serve a copy of your
Answer to said Complaint
upon Plaintiff or its counsel,
S. Tyler Graves and
Logan S. Davis, at 125
Wappoo Creek Drive,
Building E, Suite 102,
Charleston, South Carolina
29412, within thirty (30)
days after service hereof,
exclusive of the day of such
service, and if you fail to
Answer the Complaint
within the time aforesaid,
Plaintiff will apply to the
Court for the relief
demanded in the
Complaint.
Respectfully submitted,
GRAVES & DAVIS, LLC
s/ Logan S. Davis
Logan S. Davis, Esq.
(S.C. Bar # 104429)
S. Tyler Graves, Esq.
(S.C. Bar # 103173)
125E Wappoo Creek Dr.,
Ste. 102
Charleston, South Carolina
29412
P: 843-805-4649 /
F: 843-620-1047
ldavis@gravesdavis.com
tgraves@gravesdavis.com
Attorneys for Plaintiff
December 21, 2023
Charleston, South Carolina
ADA# 2070381

CHRISTINA J. ROBES-TEASLEY
Notary Public
State of South Carolina
My Commission Expires Mar 15, 2032

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT
CRYSTAL BROWN NWANERI**

The Plaintiff, by and through her undersigned counsel, hereby requests the Honorable Clerk of Court for an Entry of Default against Defendant Crystal Brown Nwaneri, pursuant to Rule 55(a) of the South Carolina Rules of Civil Procedure.

The basis of this Motion is that the Defendant Crystal Brown Nwaneri was served with the Lis Pendens, Summons and Complaint on June 5, 2024 and has failed to file an Answer or other responsive pleading.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 16, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

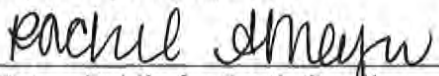
**AFFIDAVIT OF
NON-MILITARY SERVICE**

PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is familiar with the provisions of 50 USC.A App. §520, Soldiers' and Sailors' Civil Relief Act of 1940, and to induce the Court to enter a default judgment against Defendant Crystal Brown Nwaneri represents to this Court, that from review of the file in this matter, the said Defendant does not appear to be in the Military Service of the United States and is not entitled to protection of the Soldiers' and Sailors' Civil Relief Act of 1940 nor any amendments thereof.



Logan S. Davis, Esq. (S.C. Bar # 104429)
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Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.



Notary Public for South Carolina

My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

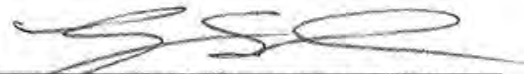
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

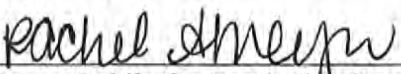
AFFIDAVIT OF DEFAULT

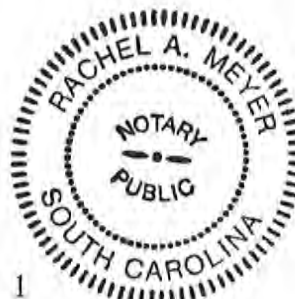
PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is an attorney at law, and represents the Plaintiff herein; that the Lis Pendens, Summons and Complaint in this action were duly served on the Defendant Crystal Brown Nwaneri, on June 5, as it appears from the proof of the same on record with the Clerk of Court; that more than thirty (30) days have elapsed since the completion of said service upon the Defendant, and that the Defendant is now in default, no answer having been served by Defendant, nor her attorney. Plaintiff requests an Entry of Default against Defendant Crystal Brown Nwaneri.



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ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.


Notary Public for South Carolina
My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION FOR REFERENCE TO THE
MASTER-IN-EQUITY**

Plaintiff commenced this action in equity to partition by sale certain real property located in Charleston County, South Carolina. Plaintiff hereby moves this Court to issue an Order of Reference, pursuant to Rule 53(b), SCRCF, referring this equitable proceeding to the Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, for the purpose of receiving evidence and with all appeals to be made directly to the South Carolina Court of Appeals.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

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Attorneys for Plaintiff

September 17, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER OF REFERENCE TO
THE MASTER-IN-EQUITY**

UPON reading the Plaintiff's Motion for Reference to the Master-in-Equity, and upon consideration of same, and it being made to appear to my satisfaction that this matter involves a partition action to real property.

THEREFORE, IT IS ORDERED, ADJUDGED and DECREED that this case be, and the same is hereby, referred pursuant to SCRCP Rule 53 to The Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, to take testimony and issue a Final Decree, with any appeal from the Master to be directly to the South Carolina Supreme Court or the Court of Appeals.

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Master-in-Equity is given authority to hear any and all post-trial motions, including, but not limited to, motions under Rules 52, 59 and 60, SCRCP.

AND IT IS SO ORDERED!

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Referred to Master or Special Referee

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

ORIGIN ID: REMA (843) 805-4649
GRAVES DAVIS LLC

SHIP DATE: 15 JAN 25
ACTWGT: 0.50 LB
CAD: 256649294/NET4820

1730 CENTRAL PARK ROAD

CHARLESTON, SC 29412

UNITED STATES US

BILL SENDER

TO CRYSTAL BROWN NWANERI

17293 OAKWOOD LODGE LANE

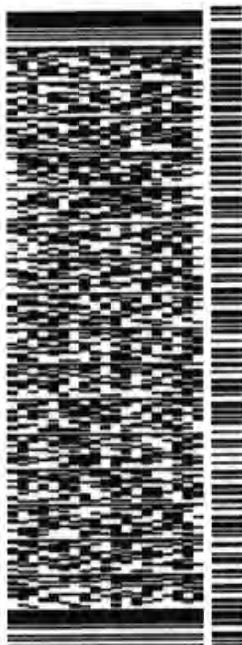
PINEY POINT MD 20674

(843) 805-4649

REF:

PO:

DEPT:



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GRAVES & DAVIS

Attorneys at Law

ATTORNEYS

LOCATION
1730 Central Park Road
Charleston, SC 29412

Tyler Graves, *Attorney* (SC)
Logan Davis, *Attorney* (SC)
Harrison Benefield, *Attorney* (SC) (GA)
Lindsay Barton, *Attorney* (SC)
Seth Manaker, *Of Counsel* (SC)

CONTACT
P: (843) 805-4649
F: (843) 620-1047

January 15, 2025

SENT VIA FEDEX

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
Piney Point, MD 20674

Re: Danielle C. Brown v. Crystal Brown Nwaneri
Case No.: 2023-CP-10-06212, Master-in-Equity Court for Charleston County, South Carolina

Dear Ms. Nwaneri:

Pursuant to the South Carolina Rules of Civil Procedure, enclosed please find a Notice of Hearing in the above-referenced matter.

As a courtesy, we are also providing you with copies of all filings of record in this case, which include:

1. Summons and Complaint
2. Notice
3. Lis Pendens
4. Affidavits of Non-Service
5. Order of Publication
6. Motion of Entry of Default and related affidavits
7. Order for Entry of Default
8. Order of Reference

Please review these documents carefully. If you have any questions about your legal rights or obligations, you may wish to consult with an attorney.

Sincerely,


Logan S. Davis, Esq.
1730 Central Park Road
Charleston, SC 29412
Phone: (843) 805-4649
Fax: (843) 620-1047
Ldavis@gravesdavis.com

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

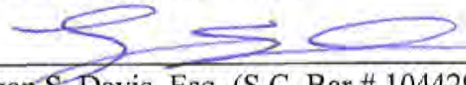
NOTICE OF HEARING

TO: DEFENDANT CRYSTAL BROWN NWANERI

YOU WILL PLEASE TAKE NOTICE that a partition hearing in this matter will be held on January 29, 2025 at 3:00 PM before the Honorable Mikell R. Scarborough, Master-In-Equity/Special Referee for Charleston County, at the Charleston County Judicial Center, 100 Broad Street, Suite 266, Charleston, SC 29401.

Respectfully submitted,

GRAVES & DAVIS, LLC


Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
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Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
tgraves@gravesdavis.com
ldavis@gravesdavis.com
Attorneys for Plaintiff

January 15, 2025
Charleston, South Carolina



Charleston County

Court Rosters

Pending Cases Search Clerk of Court Home Return To Roster Selection Jury & Non Jury Trial Roster Clerk of Court Chat

Court Agency	10003	Judge	Scarborough	Roster Description	Master in Equity Docket for January 29, 2025
Roster Type	Master's Hearings	Roster Begin Date	01/29/2025	Roster End Date	01/29/2025
Roster Id	2449	Roster Begin Time	10:00 AM		

Attorney Bar Number	Case #	Filed From	Filed Thru								
#	Scheduled Date	Start Time	Duration Hrs:Mins	Description	Filing Party	Filed Date	Case / Case Caption	Sub Type	Tax Map	Plaintiff Attorney	Defendant
1	01/29/2025	10:00 AM	1:0	Master/Damages Hearing-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kerith L (843) 86
2	01/29/2025	10:00 AM		Master/Motion to Dismiss-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kerith L (843) 86
3	01/29/2025	11:00 AM	1:0	Master/Partition Hearing-Jan. 29 at 11:00	Letisha Jackson Adams-PLT	12/31/2024	2024CP1001100 Letisha Jackson Adams VS Lamar D Jackson , defendant, et al	Partition 440	5350400032	J. Christopher Lanning (843) 766-5576	Conrad L (843) 57 Ittrich J. J (843) 20
4	01/29/2025	2:00 PM	1:0	Master/Valuation Hearing-Jan. 29 at 2:00	Ada Bennett-PLT	12/31/2024	2019CP1000395 Ada Bennett , plaintiff, et al VS Edward Meyers , defendant, et al	Real Prop/Other 499	5830000055 5830000065 5830000077	Willie Bruce Heyward (843) 225-8754 John Fulton Knobloch (843) 884-3670	Kelly Mai (843) 57 Thomas B (843) 24 Kyle Var (843) 76
5	01/29/2025	3:00 PM	1:0	Master/Partition Hearing-Jan. 29 at 3:00	Danielle C Brown-PLT	12/31/2024	2023CP1006212 Danielle C Brown VS Crystal Brown Nwaneri	Partition 440	9850600026	Logan Steele Davis (843) 860-8969 Stephen Tyler Graves (843) 727-5741	

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**SUMMONS
(Non-Jury, Partition)**

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to said Complaint upon Plaintiff or its counsel, S. Tyler Graves and Logan S. Davis, at 125 Wappoo Creek Drive, Building E, Suite 102, Charleston, South Carolina 29412, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to Answer the Complaint within the time aforesaid, Plaintiff will apply to the Court for the relief demanded in the Complaint.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

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Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

COMPLAINT
(Non-Jury, Partition)

Plaintiff, Danielle C. Brown, by and through her undersigned counsel, alleges and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, Danielle C. Brown ("Plaintiff"), is a citizen and resident of Smyrna, Georgia.
2. Defendant, Crystal Brown Nwaneri ("Defendant") is a citizen and resident of Piney Point, Maryland.
3. The real property that is the subject of this action, and which Plaintiff and Defendant own together as tenants in common, is located in Charleston County, South Carolina.
4. This Court has jurisdiction over both the subject matter and parties to this action.
5. Venue in Charleston County, South Carolina is proper.

FACTUAL ALLEGATIONS

6. The preceding paragraphs are repeated as if set forth verbatim herein.
7. The real property subject to this action is located at 8297 Delhi Road, North Charleston, SC 29406 (the "Property").
8. The Property can more fully be described as

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

9. Plaintiff and Defendant are sisters, and the children of George Lee Brown.
10. George Lee Brown died intestate on April 9, 2018.
11. George Lee Brown owned the Property at the time of his death.
12. Plaintiff and Defendant were the sole heirs to the estate of George Lee Brown.
13. Plaintiff was appointed personal representative of the estate of George Lee Brown on September 30, 2021.
14. Plaintiff, in her capacity as personal representative, executed a deed of distribution to Plaintiff and Defendant on May 7, 2022. The deed of distribution was recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.
15. Accordingly, Plaintiff and Defendant each own an undivided fifty percent (50%) interest in the Property.
16. Upon information and belief, there is no mortgage encumbering the Property.
17. Plaintiff wishes to sell the Property.
18. Defendant refuses to sell the Property.

FOR A FIRST CAUSE OF ACTION
(Partition Action)

19. The preceding paragraphs are repeated as if set forth verbatim herein.

20. Pursuant to S.C. Code Ann. §§15-61-10, et. seq., partition of the Property is compellable between the Plaintiff and Defendant as joint tenants, subject to all rights of first refusal, appraisal, and notice as directed by law.

21. The Property does not constitute heirs' property and is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act.

22. Plaintiff is entitled to an order compelling partition of the Property by allotment or by sale as provided by law, with apportionment and division of the new sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests, and affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity commensurate with the parties' respective contributions and improvements towards the Property.

WHEREFORE, Plaintiff prays that this Honorable Court issue its Order:

- A. Compelling partition of the Property by allotment or by sale as provided by law, apportioning and dividing the net sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests and share, affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity as pled herein;
- B. Awarding Plaintiff's attorneys' fees and costs as provided by law; and
- C. All other such relief as may be just and proper.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

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Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

NOTICE

(S.C. Code Ann. §15-61-25)

TO THE DEFENDANT ABOVE-NAMED:

As a non-petitioning party/joint tenant/tenant in common in this action, this notice is provided pursuant to Section 15-61-25, South Carolina Code of Laws. Please review the below and take note of all rights, responsibilities, and timeframes for performance and notices to the Court should you elect to exercise the rights so stated:

SECTION 15-61-25. RIGHT OF FIRST REFUSAL OF JOINT TENANT OR TENANT IN COMMON TO PURCHASE PROPERTY PRIOR TO PARTITION; PROCEDURE.

- (A) For the purposes of this section, "joint tenants and tenants in common" include heirs or devisees. Upon the filing of a petition for partition of real property owned by joint tenants or tenants in common, the court shall provide for the non-petitioning joint tenants or tenants in common who are interested in purchasing the property to notify the court of that interest no later than ten days prior to the date set for the trial of the case. The non-petitioning joint tenants or tenants in common shall be allowed to purchase the interests in the property as provided in this section whether default has been entered against them or not.
- (B) In the circumstances described in subsection (A) of this section, and in the event the parties cannot reach agreement as to the price, the value of the interest or interests to be sold shall be determined by one or more competent real estate appraisers, as the court shall approve, appointed for that purpose by the court. The appraisers appointed pursuant to this section shall make their report in writing to the court within thirty days after their appointment. The costs of the appraisers appointed pursuant to this section shall be taxed as a part of the cost of court to those seeking to purchase the interests of the joint tenants or tenants in common petitioning to sell their interest in the property described in the petition for partition.

- (C) In the event that the petitioning joint tenants or tenants in common object to the value of the interests as determined by the appointed appraisers, those joint tenants or tenants in common shall have ten days from the date of filing of the report to file written notice of objection to the report and request a hearing before the court on the value. An evidentiary hearing limited to the proposed valuation of the interests of the petitioning joint tenants or tenants in common shall be conducted, and an order as to the valuation of the interests of the petitioning joint tenants or tenants in common shall be issued.
- (D) After the valuation of the interest in property is completed as provided in subsection (B) or (C) of this section, the nonpetitioning joint tenants or tenants in common seeking to purchase the interests of those filing the petition shall have forty-five days to pay into the court the price set as the value of those interests to be purchased. Upon the payment and approval of it by the court, the court shall execute and deliver or cause to be executed and delivered the proper instruments transferring title to the purchasers.
- (E) In the event that the nonpetitioning joint tenants or tenants in common fail to pay the purchase price as provided in subsection (D) of this section, the court shall proceed according to its traditional practices in partition sales.

HISTORY: 2006 Act No. 302, Section 1, eff May 25, 2006, applicable to all petitions for partition filed after that date.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

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ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023
Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

LIS PENDENS

NOTICE IS HEREBY GIVEN that an action will be commenced and is pending in this Court upon the Complaint of the Plaintiff above-named against the above-named Defendant. Plaintiff seeks equitable partition of the property as provided in Section 15-61-10, et seq., South Carolina Code of Laws, 1976, as amended, together with such incidental relief as may be provided in the statutes and case law of the State of South Carolina.

At the time of filing this notice, the property affected by this action is located in Charleston County, State of South Carolina, and described as follows:

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

Reference to said deed is craved.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

VS.

CRYSTAL BROWN NWANERI

Defendant/Respondent

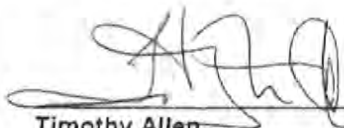
AFFIDAVIT OF NON-SERVICE OF:
SUMMONS, COMPLAINT, NOTICE, LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

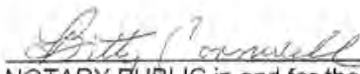
Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: **17293 Oakwood Lodge Lane, Piney Point, MD 20674** and was unable to effect service for the following reasons:

- 3/4/2024 4:30 PM: Refused to answer the door. I spoke with a neighbor who says subject resides.
- 3/10/2024 5:01 PM: There was no answer at the address. I spoke with a neighbor who says subject resides.
- 3/13/2024 5:39 PM: Noise heard inside refused to answer door. I spoke with a neighbor who says subject resides.
- 3/17/2024 10:08 AM: I spoke with an individual who identified themselves as the resident. I spoke with a neighbor who says subject resides. Refused to open the door

Date: 3-25-24


Timothy Allen

SUBSCRIBED AND SWORN to before me this 25 day of March, 2024


NOTARY PUBLIC in and for the State of **Maryland**
My commission expires 12-7-2024



IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

vs.

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF:

SUMMONS; COMPLAINT; NOTICE; LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: **17293 Oakwood Lodge Lane, Piney Point, MD 20674** and was unable to effect service for the following reasons:

1/10/2024 5:04 PM: There was no answer at the address.

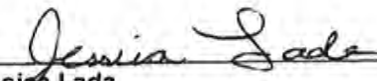
1/10/2024 6:09 PM: There was no answer at the address.

1/12/2024 9:41 AM: There was no answer at the address. Heard young child say mommy. Waited no one came to the door

1/14/2024 11:18 AM: There was no answer at the address. White Lincoln navigator in driveway Maryland tags 6FA5205. Heard movement and voices. No one answered the door.

1/16/2024 11:55 AM: There was no answer at the address. Lights on. Vehicles in driveway. Rang door bell, knocked numerous times. No one would answer the door. Pictures uploaded of vehicles.

Date: 1/17/24

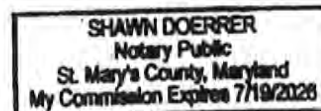


Jessica Lada

SUBSCRIBED AND SWORN to before me this 17th day of January, 2024.

 Shawn Doerrer

NOTARY PUBLIC in and for the State of Maryland
My commission expires 07/19/2026



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION AND ORDER FOR
SERVICE BY PUBLICATION**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, Danielle C. Brown (hereinafter referred to as the "Plaintiff"), by and through her undersigned counsel for purpose effectuating service upon the above-captioned Defendant (hereinafter referred to as "Defendant") move before this Honorable Court, for an Order authorizing service by publication of the above referenced matter, on the basis that the Defendant still has not been personally served. The Plaintiff has not been able to effectuate service pursuant to ordinary means: personal service or substituted service, and upon information and belief, the Defendant is aware of this matter, has made no attempt to provide her whereabouts to any other parties and is actively endeavoring to evade service.

FACTS

1. On or about December 21, 2023, Plaintiff initiated the subject partition action by filing a Summons and Complaint in this Court.
2. Plaintiff obtained Defendant's address from prior knowledge, current legal proceedings, and other public records.
3. Plaintiff hired ABC Legal, a company engaged in the business of performing skip-traces and serving legal documents, to serve the Summons and Complaint on Defendant.

4. ABC Legal attempted service on Defendant on January 10, 2024, January 12, 2024, January 14, 2024, and January 16, 2024. However, these attempts were unsuccessful.
5. ABC Legal returned a signed proof of non-service document which has been filed with this Court.
6. In an attempt to further investigate the location of Defendant, ABC Legal ran a skip trace on Defendant, which confirmed Defendant resides at the location where ABC Legal had attempted service of process on Defendant.
7. Further, ABC Legal or its representatives have spoke with the neighboring property owner(s) and confirmed Defendant lives at the location where ABC Legal had attempted service of process on Defendant.
8. ABC Legal again attempted to serve Defendant following the skip trace on March 4, 2024, March 10, 2024, March 13, 2024, and March 17, 2024.
9. On March 17, 2024, Timothy Allen, a representative of ABC Legal, spoke with an unknown individual who identified themselves as the resident of the location; however, the person refused to open the door.
10. ABC Legal returned a second signed proof of non-service document which has been filed with this Court.
11. To date the Defendant has not attempted to contact Plaintiff's attorney or process server.

APPLICABLE LAW

S.C. Code Ann. § 15-9-710 authorizes service of the summons be made by publication when, after due diligence, the person to be served cannot be found within the State and that fact appears by affidavit to the satisfaction of the court...and it in like manner appears that the cause of action exists against the defendant in respect to whom the service is to be made or that he is a

proper party to an action relating to real property in this state...when the subject of the action is real or personal property in this State and the defendant has or claims a lien or interest, actual or contingent, therein or the relief demanded consists wholly or partly in excluding the defendant from any interest or lien therein.

CONCLUSION OF LAW

Based on this Motion and the affidavits of non-service filed with this Court, which are incorporated herein by reference, I find that the Plaintiff is entitled to effectuate service by publication regarding Defendant.

WHEREFORE, Plaintiff moves this Court for an order of service by publication.

IT IS THEREFORE ORDERED, that Plaintiff is granted leave to effectuate service by publication pursuant to S.C. Code § 15-9-740 in the Post & Courier, a newspaper of common circulation in Charleston County.

_____, 2024.

Presiding Judge for Charleston County

I SO MOVE:

s/Logan S. Davis
Logan S. Davis, Esq.
Graves & Davis, LLC
125 Wappoo Creek Dr.
Bldg. E, Suite 102
Charleston, SC 29412
Phone: 843-805-4649
Facsimile: 843-620-1047
Ldavis@gravesdavis.com
Attorney for the Plaintiffs

Date: April 16, 2024



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Publication

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Logan Davis Graves & Davis LLC
125E Wappoo Creek Drive, Suite 102
CHARLESTON SC 29412

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina

County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of appeared in the issues of said newspaper Post and Courier on the following day(s):
05/22/24, 05/29/24, 06/05/24

JUN 05 2024

Subscribed and sworn to before me this:

5th day of June, 2024


Advertising Clerk


NOTARY PUBLIC, SC
My commission expires

CHRISTINA J. ROBES-TEASLEY
Notary Public
State of South Carolina
My Commission Expires Mar 15, 2032

STATE OF
SOUTH CAROLINA
COUNTY OF
CHARLESTON
IN THE
COURT OF
COMMON PLEAS
FOR THE
NINTH JUDICIAL
CIRCUIT
C/A No.:
2023-CP-10-06212
SUMMONS
(Non-Jury, Partition)
DANIELLE C. BROWN,
Plaintiff,
v.
CRYSTAL BROWN
NWANERI,
Defendant.
TO THE DEFENDANT
ABOVE NAMED:
YOU ARE HEREBY
SUMMONED and required
to answer the Complaint in
this action, a copy of which
is hereby served upon you,
and to serve a copy of your
Answer to said Complaint
upon Plaintiff or its counsel,
S. Tyler Graves and
Logan S. Davis, at 125
Wappoo Creek Drive,
Building E, Suite 102,
Charleston, South Carolina
29412, within thirty (30)
days after service hereof,
exclusive of the day of such
service, and if you fail to
Answer the Complaint
within the time aforesaid,
Plaintiff will apply to the
Court for the relief
demanded in the
Complaint.
Respectfully submitted,
GRAVES & DAVIS, LLC
s/ Logan S. Davis
Logan S. Davis, Esq.
(S.C. Bar # 104429)
S. Tyler Graves, Esq.
(S.C. Bar # 103173)
125E Wappoo Creek Dr.,
Ste. 102
Charleston, South Carolina
29412
P: 843-805-4649 /
F: 843-620-1047
ldavis@gravesdavis.com
tgraves@gravesdavis.com
Attorneys for Plaintiff
December 21, 2023
Charleston, South Carolina
ADR# 2070381

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT
CRYSTAL BROWN NWANERI**

The Plaintiff, by and through her undersigned counsel, hereby requests the Honorable Clerk of Court for an Entry of Default against Defendant Crystal Brown Nwaneri, pursuant to Rule 55(a) of the South Carolina Rules of Civil Procedure.

The basis of this Motion is that the Defendant Crystal Brown Nwaneri was served with the Lis Pendens, Summons and Complaint on June 5, 2024 and has failed to file an Answer or other responsive pleading.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 16, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

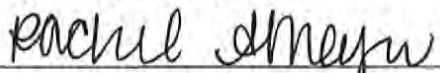
**AFFIDAVIT OF
NON-MILITARY SERVICE**

PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is familiar with the provisions of 50 USC.A App. §520, Soldiers' and Sailors' Civil Relief Act of 1940, and to induce the Court to enter a default judgment against Defendant Crystal Brown Nwaneri represents to this Court, that from review of the file in this matter, the said Defendant does not appear to be in the Military Service of the United States and is not entitled to protection of the Soldiers' and Sailors' Civil Relief Act of 1940 nor any amendments thereof.



Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 14
day of September, 2024.



Notary Public for South Carolina

My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

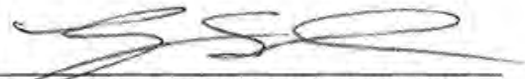
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

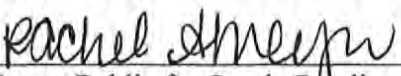
AFFIDAVIT OF DEFAULT

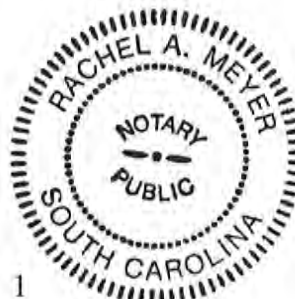
PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is an attorney at law, and represents the Plaintiff herein; that the Lis Pends, Summons and Complaint in this action were duly served on the Defendant Crystal Brown Nwaneri, on June 5, as it appears from the proof of the same on record with the Clerk of Court; that more than thirty (30) days have elapsed since the completion of said service upon the Defendant, and that the Defendant is now in default, no answer having been served by Defendant, nor her attorney. Plaintiff requests an Entry of Default against Defendant Crystal Brown Nwaneri.



Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.


Notary Public for South Carolina
My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION FOR REFERENCE TO THE
MASTER-IN-EQUITY**

Plaintiff commenced this action in equity to partition by sale certain real property located in Charleston County, South Carolina. Plaintiff hereby moves this Court to issue an Order of Reference, pursuant to Rule 53(b), SCRCF, referring this equitable proceeding to the Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, for the purpose of receiving evidence and with all appeals to be made directly to the South Carolina Court of Appeals.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 17, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER OF REFERENCE TO
THE MASTER-IN-EQUITY**

UPON reading the Plaintiff's Motion for Reference to the Master-in-Equity, and upon consideration of same, and it being made to appear to my satisfaction that this matter involves a partition action to real property.

THEREFORE, IT IS ORDERED, ADJUDGED and DECREED that this case be, and the same is hereby, referred pursuant to SCRCP Rule 53 to The Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, to take testimony and issue a Final Decree, with any appeal from the Master to be directly to the South Carolina Supreme Court or the Court of Appeals.

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Master-in-Equity is given authority to hear any and all post-trial motions, including, but not limited to, motions under Rules 52, 59 and 60, SCRCP.

AND IT IS SO ORDERED!

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Referred to Master or Special Referee

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

EXHIBIT E
Successful FedEx Delivery – Signature Not Required



January 21, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 771449779691

Delivery Information:

Status:	Delivered	Delivered To:	Residence
Signed for by:	Signature not required	Delivery Location:	17293 OAKWOOD LODGE LN
Service type:	FedEx Priority Overnight		
Special Handling:	Deliver Weekday; Residential Delivery		PINEY POINT, MD, 20674
		Delivery date:	Jan 16, 2025 14:24

Shipping Information:

Tracking number:	771449779691	Ship Date:	Jan 15, 2025
		Weight:	0.5 LB/0.23 KG

Recipient: Crystal Brown Nwaneri, 17293 Oakwood Lodge Lane PINEY POINT, MD, US, 20674	Shipper: Graves Davis LLC, 1730 Central Park Road Charleston, SC, US, 29412
---	---

Proof-of-delivery details appear below; however, no signature is available for this FedEx Express shipment because a signature was not required.

Thank you for choosing FedEx

EXHIBIT F
Unsuccessful FedEx Delivery – Signature Required



[Learn](#) about the impacts of winter weather on FedEx services.

FedEx® Tracking



SHOPRUNNER by FedEx

Ready to shop again?
Get exclusive deals at your favorite stores.



SHOP NOW

SCHEDULED DELIVERY DATE

Today

Before 5:00 PM

Your package is at our facility. We'll let you know when it moves again.

DELIVERY STATUS

We tried to deliver



ADD YOUR EMAIL TO STAY UPDATED ON THIS SHIPMENT

admin@gravesdavis.com

GET UPDATES

MORE OPTIONS

TRACKING ID

771449731962

FROM

Graves Davis LLC
1730 Central Park Road
Charleston, SC US 29412
8438054649

Label Created

ELECTRONICALLY FILED - 2025 Jan 27 12:03 PM - CHARLESTON - COMMON PLEAS - CASE#2023CP1006212



NORTH CHARLESTON, SC
1/15/25 5:42 PM

WE TRIED TO DELIVER

WALDORF, MD
1/21/25 9:36 AM

OUT FOR DELIVERY

WALDORF, MD
1/17/25 8:58 AM

TO

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
PINEY POINT, MD US 20674
8438054649

Scheduled Delivery Date

Today

Before 5:00 PM

↓ [View travel history](#)

Manage delivery

📍 [Hold at location](#)

↶ [Return to shipper](#)



Want to know when your package will arrive?

Take more control of your delivery with FedEx Delivery Manager®.

[SIGN UP FOR FREE](#)

Shipment facts



Shipment overview

TRACKING NUMBER 771449731962

DOOR TAG NUMBER DT107044594232, DT107106334781

STANDARD TRANSIT ⓘ 1/16/25 before 5:00 PM

SCHEDULED DELIVERY DATE 1/21/25 before 5:00 PM



Services

SERVICE FedEx Priority Overnight

DELIVERY ATTEMPTS 2

TERMS Shipper

SPECIAL HANDLING SECTION Deliver Weekday, Residential Delivery, Direct Signature Required

SIGNATURE SERVICES ⓘ Direct signature required



Package details

WEIGHT 0.5 lbs / 0.23 kgs

TOTAL PIECES 1

TOTAL SHIPMENT WEIGHT 0.5 lbs / 0.23 kgs

PACKAGING FedEx Envelope

[↑ Back to top](#)

Travel history

SORT BY DATE/TIME

Ascending

Time zone

Local Scan Time

- 10:07 AM
Shipment information sent to FedEx
- 5:42 PM
Picked up
NORTH CHARLESTON, SC
- 5:45 PM
Shipment arriving On-Time
NORTH CHARLESTON, SC
- 7:53 PM
Left FedEx origin facility
NORTH CHARLESTON, SC
- 10:57 PM
Arrived at FedEx hub
MEMPHIS, TN

Thursday, 1/16/25

- 2:47 AM
Departed FedEx hub
MEMPHIS, TN
- 5:21 AM
At destination sort facility
DULLES, VA
- 7:38 AM
At local FedEx facility
WALDORF, MD
- 8:11 AM
On FedEx vehicle for delivery
WALDORF, MD
- 2:25 PM
Delivery exception
Customer not available or business closed
WALDORF, MD
- 2:26 PM
Delivery updated
WALDORF, MD
- 6:35 PM
At local FedEx facility
WALDORF, MD



- 7:52 AM
At local FedEx facility
WALDORF, MD
- 8:58 AM
On FedEx vehicle for delivery
WALDORF, MD
- 12:57 PM
Delivery exception
Customer not available or business closed
WALDORF, MD
- 12:59 PM
Delivery updated
WALDORF, MD
- 6:42 PM
At local FedEx facility
WALDORF, MD

Saturday, 1/18/25

- 9:32 AM
At local FedEx facility
WALDORF, MD

Monday, 1/20/25

- 9:12 AM
At local FedEx facility
WALDORF, MD
- 9:17 AM
Delivery updated
WALDORF, MD

Tuesday, 1/21/25

- ➔ 9:36 AM
At local FedEx facility
WALDORF, MD

[↑ Back to top](#)

Select a tab*

All (25)



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- FedEx Logistics
- ShopRunner

LANGUAGE

 United States

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EXHIBIT G
Phase II Lawn Care Receipts



phaseilawncare@gmail.com

**Results****Phase II Enterprises...****-\$150**

Sep 19

Money sent

**Phase II Enterprises...****-\$75**

Sep 10

Money sent

**Phase II Enterprises...****-\$75**

Aug 10

Money sent

**Phase II Enterprises...****-\$150**

Jul 27

Money sent

**Phase II Enterprises...****-\$150**

Jun 14

Money sent

**Phase II Enterprises...****-\$150**

May 9

Money sent

**Phase II Enterprises...****-\$150**

Apr 11

Money sent

**Phase II Enterprises...****-\$190**

Mar 9

Money sent



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$190**

Mar 9

Money sent

**Phase II Enterprises...****-\$190**

Feb 23

Money sent

**Phase II Enterprises...****-\$75**

Feb 13

Money sent

**Phase II Enterprises...****-\$75**

Dec 29

Money sent

**Phase II Enterprises...****-\$50**

Dec 21

Money sent

**Phase II Enterprises...****-\$300**

Dec 19

Money sent

**Phase II Enterprises...****-\$150**

Dec 4

Money sent

**Phase II Enterprises...****-\$150**

Nov 7

Money sent

**Phase II Enterprises...****-\$150**



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$150**

Sep 11

Money sent

**Phase II Enterprises...****-\$75**

Aug 14

Money sent

**Phase II Enterprises...****-\$150**

Jul 17

Money sent

**Phase II Enterprises...****-\$150**

Jul 10

Money sent

**Phase II Enterprises...****-\$75**

Jun 16

Money sent

**Phase II Enterprises...****-\$75**

May 17

Money sent

**Phase II Enterprises...****-\$75**

Apr 27

Money sent

**Phase II Enterprises...****-\$500**

Mar 31

Money sent

**Phase II Enterprises...****-\$75**



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$75**

Mar 20

Money sent

**Phase II Enterprises...****-\$75**

Mar 2

Money sent

**Phase II Enterprises...****-\$500**

Feb 6

Money sent

**Phase II Enterprises...****-\$500**

Jan 1

Money sent

**Phase II Enterprises...****-\$75**

Nov 28

Money sent

**Phase II Enterprises...****-\$75**

Nov 1

Money sent

**Phase II Enterprises...****-\$75**

Nov 1

Money sent

**Phase II Enterprises...****-\$200**

Oct 5

Money sent

**Phase II Enterprises...****-\$150**



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$150**

Aug 30

Money sent

**Phase II Enterprises...****-\$75**

Aug 12

Money sent

**Phase II Enterprises...****-\$150**

Jul 25

Money sent

**Phase II Enterprises...****-\$100**

Jul 5

Money sent

**Phase II Enterprises...****-\$150**

Jun 16

Money sent

"Lawn services"

**Phase II Enterprises...****-\$150**

May 28

Money sent

**Phase II Enterprises...****-\$75**

May 2

Money sent

**Phase II Enterprises...****-\$150**

Apr 12

Money sent



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$150**

Jul 25

Money sent

**Phase II Enterprises...****-\$100**

Jul 5

Money sent

**Phase II Enterprises...****-\$150**

Jun 16

Money sent

"Lawn services"

**Phase II Enterprises...****-\$150**

May 28

Money sent

**Phase II Enterprises...****-\$75**

May 2

Money sent

**Phase II Enterprises...****-\$150**

Apr 12

Money sent

**Phase II Enterprises...****-\$425**

Mar 18

Money sent

EXHIBIT H
Affidavit of Attorney's Fees

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

AFFIDAVIT OF ATTORNEY'S FEES

PERSONALLY appeared before me the undersigned attorney, Logan S. Davis, being duly sworn, deposes, and says:

1. I am over the age of eighteen (18) and am testifying as to this information upon my personal knowledge, information, and belief.

2. I am an attorney licensed in the State of South Carolina with the law firm, Graves & Davis, LLC, located at 1730 Central Park Road, Charleston, South Carolina 29412.

3. Graves & Davis, LLC is responsible for the representation of Ms. Danielle C. Brown ("Plaintiff").

4. The above-captioned case is an action in which the Plaintiff is entitled to recover attorneys' fees.

5. As counsel for the Plaintiff in this action, I am familiar with the type of legal fees that are generally awarded.

6. Counsel's fee agreement with Plaintiff is based upon billable hours, pursuant to an engagement letter between Graves & Davis, LLC and Plaintiff.

7. Since the commencement of the engagement agreement on or about December 13, 2023, through the date of this Affidavit, Plaintiff has accumulated a total of \$5,400.00, in attorneys' fees and \$823.34 in other legal costs relating to this matter.

8. Tasks performed to date in connection with this matter include: review of probate and property records relevant to this claim; research as to the whereabouts of the defendant; preparation, filing and service of pleadings, including service by publication; preparation and filing of motion for default; preparation and filing of proposed order of reference, preparation and delivery of notice of hearing; preparation of memorandum in support of partition and exhibits thereto; and other general communications and preparation.

9. Counsel respectfully requests that the Court take notice of additional time and fees that will accrue between the date of this Affidavit and the hearing scheduled for January 29, 2025, and that counsel respectfully notifies the Court that it anticipates presenting a supplementary attorneys' fees affidavit at the hearing.

10. Further, counsel respectfully notifies the Court that additional time and fees will be needed to provide legal guidance to Plaintiff with respect to the sale that will occur following an order of partition and, thus, counsel respectfully notifies the Court that it anticipates future work will be required on this matter so counsel may request additional fees during the post-judgment process.

11. The attorneys' fees and other legal costs requested herein are appropriate under the factors set forth by the South Carolina Supreme Court in *Jackson v. Speed*: (1) the nature, extent, and difficulty of the case; (2) the time necessarily devoted to the case; (3) professional standing of counsel; (4) contingency of compensation; (5) beneficial results obtained; and (6) customary legal fees for similar services. See *Jackson v. Speed*, 326 S.C. 289, 308, 486 S.E.2d 750,760 (1997).

12. This affidavit is being submitted in support of Plaintiff's request for attorneys' fees and other legal costs in accordance with Rule 55(b)(3) of the South Carolina Rules of Civil Procedure.

13. On behalf of the Plaintiff, I request an award for all attorneys' fees and other legal costs to date in addition to the further attorneys' fees and other legal costs anticipated to be performed until final adjudication of this matter (as noted above).

FURTHER AFFIANT SAYETH NOT.


Logan S. Davis, Esq. (S.C. Bar # 104429)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com

SWORN TO AND SUBSCRIBED
Before me this 27th day of January 2025.


NOTARY PUBLIC FOR SOUTH CAROLINA

Printed Name: Stephen Tyler Graves

My commission expires: September 28, 2031



STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**AMENDED MEMORANDUM
IN SUPPORT OF
PARTITION BY SALE**

The Plaintiff, by and through her undersigned counsel, hereby submits for the Court's consideration her Memorandum in Support of Partition by Sale, in advance of the subject Partition Hearing scheduled in this matter for August 25, 2025, at 2:00 P.M.

INTRODUCTION

This matter comes before the Court on Plaintiff's action for partition by sale of that certain residential real property located at 8297 Delhi Road, North Charleston, SC 29406 (the "Property"). The Property is currently owned as tenants in common between Plaintiff Danielle C. Brown and Defendant Crystal Brown Nwaneri, with each holding an undivided fifty percent (50%) interest.

STATEMENT OF FACTS

1. The subject Property was originally owned by George Lee Brown, who died intestate on April 9, 2018.

2. Upon his death, the Property passed to his two children, Plaintiff and Defendant, as his sole heirs at law.

3. Plaintiff was appointed personal representative of her father's estate (Estate No. 2021ES1000886) on September 30, 2021.

4. On May 7, 2022, Plaintiff, in her capacity as personal representative, executed a deed of distribution conveying the Property to herself and Defendant. This deed was recorded on June 2, 2022, in Book 1113, at page 766 of the Charleston County Register of Deeds. A copy of the deed of distribution is attached hereto as Exhibit A.

5. Plaintiff has expressed her desire to sell the Property, but Defendant refuses to cooperate with such sale.

6. The Property is not encumbered by any mortgage.

7. Defendant was properly served but has failed to answer or otherwise appear in this action.

8. The Court has entered default against Defendant pursuant to Rule 55(a), SCRPC on September 17, 2024. *See* Exhibit B.

SERVICE AND NOTICE TO DEFENDANT

The record demonstrates diligent efforts to serve and notify Defendant of these proceedings:

9. After initial attempts at personal service were unsuccessful, Plaintiff proceeded with service by publication in The Post and Courier newspaper.

10. Publication was properly made on May 22, May 29, and June 5, 2024, as evidenced by the Affidavit of Publication sworn to on June 5, 2024. *See* Exhibit C.

11. A hearing was originally scheduled for January 29, 2025, at 3:00 PM, and notices of said hearing were sent to Defendant's last known address at 17293 Oakwood Lodge Lane, Piney Point, MD 20674. *See* Exhibit D.

12. One notice was successfully delivered on January 21, 2025 (FedEx tracking #771449779691). *See* Exhibit E.

13. A second notice requiring signature was attempted multiple times but Defendant refused delivery (FedEx tracking #771449731962, with delivery attempts on January 16, 17, and 21, 2025). *See* Exhibit F.

14. Following receipt of these notices and prior to the January 29, 2025 hearing, the parties agreed to continue said hearing on the condition that Defendant would agree to mediate the dispute. Based on that discussion, the parties submitted a Consent Motion and Order for Continuance, which was reviewed and approved by the Court.

15. However, since that time, Defendant has been uncooperative in scheduling mediation.

16. This matter is now set for hearing on August 25, 2025 at 2:00 PM, and Plaintiff has provided timely and proper notice of this rescheduled hearing through multiple methods to ensure Defendant received notice.

17. Notices of the August 25, 2025 hearing were sent to Defendant's last known address at 17293 Oakwood Lodge Lane, Piney Point, MD 20674 via two separate FedEx deliveries: *See* Exhibit G.

18. One notice was successfully delivered on August 15, 2025 (FedEx tracking #883502622602). *See* Exhibit H.

19. A second notice requiring signature was delivered and signed for on August 15, 2025 (FedEx tracking #883502697920). *See* Exhibit I.

20. Additionally, copies of the hearing notices were provided via email to Defendant at the email address Defendant previously used for communications in this matter. *See* Exhibit J.

21. Further, Plaintiff's counsel also copied Defendant on an email to the Court confirming the hearing would proceed as scheduled on August 25, 2025.

22. These multiple methods of service and notice for both the original and rescheduled hearings demonstrate Plaintiff's thorough efforts to inform Defendant of these proceedings, satisfying both legal requirements and principles of due process.

ARGUMENT

I. PARTITION IS APPROPRIATE AS A MATTER OF LAW

Under South Carolina law, partition is available as a matter of right to any co-tenant. S.C. Code Ann. § 15-61-10. Upon information and belief, the Property is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act. Further, Defendant has been provided the appropriate notice required for the Court to proceed with ordering a partition by sale.

II. REIMBURSEMENT SHOULD BE AWARDED TO PLAINTIFF

When one cotenant pays more than their proportionate share of expenses necessary to preserve the property, they are entitled to contribution from their cotenant. See *Shumaker v. Shumaker*, 234 S.C. 421, 108 S.E.2d 682 (1959). Here, Plaintiff has solely maintained the Property's grounds by paying Phase II Enterprises (aka Phase II Lawn Care) for regular landscaping services from 2019 to present. See Exhibit K. These necessary maintenance expenses total \$6,300.00, of which Defendant's proportionate 50% share is \$3,150.00.

Additionally, South Carolina law explicitly provides for the award of attorney's fees and costs in partition actions. Pursuant to S.C. Code Ann. § 15-61-110, "The court of common pleas may fix attorneys' fees in all partition proceedings and, as may be equitable, assess such fees against any or all of the parties in interest." Given Defendant's default and refusal to cooperate in the sale of the Property, requiring this action, it is equitable that Defendant bear the costs and

attorney's fees incurred in bringing this partition action. Plaintiff submits an Affidavit of Attorney's Fees as Exhibit L.

CONCLUSION

Based on the foregoing, Plaintiff respectfully requests that this Court:

1. Order partition by sale of the Property;
2. Order reimbursement to Plaintiff in the amount of \$3,150.00 from Defendant's share of the sale proceeds for landscaping expenses;
3. Order Defendant to pay all attorney's fees and costs pursuant to S.C. Code Ann. § 15-61-110; and
4. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

1730 Central Park Road

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

August 21, 2025

Charleston, South Carolina

EXHIBIT A
Deed of Distribution

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON
IN THE MATTER OF:
GEORGE LEE BROWN
(Decedent)

) IN THE PROBATE COURT
)
) DEED OF DISTRIBUTION
) (Real Property Only)
) NOT A WARRANTY DEED
) CASE NUMBER: 2021ES1000886



PGS:

4

BP1113766

The undersigned states as follows:

Decedent died on APRIL 9, 2018; and probate of the Estate is being administered in the Probate Court for CHARLESTON County, South Carolina, in File #2021ES1000886.

I/We was/were appointed Personal Representative (s) on SEPTEMBER 30, 2021.

Decedent owned real property described as follows:

Tax Map Number: 514-10-00-138

Street/Property Address: 3RD STREET, CHARLESTON COUNTY, SC

Legal Description: SEE EXHIBIT A

☐ Additional sheet(s) for additional property(ies) is attached (check if applicable)

This transfer is made pursuant to:

- ☐ Decedent's Will
☒ Intestacy Statute: SCPC 62-2-103
☐ Private Family Agreement: SCPC 62-3-912
☐ Disclaimer by: _____
☐ Probate Court Order Issued on _____
☐ Other: _____

PMC Law Firm
504 W. 5TH North Street
Summerville, SC 29483

In accordance with the laws of the State of South Carolina, the Personal Representative(s) does/do hereby release all of the Personal Representative's(s') right, title and interest, including statutory and/or testamentary powers, over the real property described to the beneficiaries named below:

Name: DANIELLE C. BROWN
Address: 1006 KENNINGHALL DR.
SMYRNA, GA 30082

Name: CRYSTAL BROWN NWANERI
Address: 17293 OAKWOOD LODGE LN.
PINEY POINT, MD 20674

Name: _____
Address: _____

Name: _____
Address: _____

☐ Additional sheet(s) for names of additional beneficiaries is attached (check, if applicable)

IN WITNESS WHEREOF the undersigned, as Personal Representative(s) of the above Estate, has executed this Deed of Distribution, on this _____ day of _____, 2022.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF

Witness: _____

Print Name: ROY GREEN

Witness: _____

Print Name: Lazagna Robinson

Estate of: GEORGE LEE BROWN

Signature of Personal
Representative: _____

Print Name: DANIELLE C. BROWN

If applicable,
Signature of Co-Personal
Representative: _____

Print Name: _____

STATE OF Georgia }

ACKNOWLEDGMENT

COUNTY OF Cobb

I, PREMCHAND KODALI

, _____, Notary Public, a notary for the State of South Carolina do hereby certify that DANIELLE C. BROWN, as
Personal Representative(s) of the Estate of GEORGE LEE BROWN, personally appeared before me this day and
acknowledged the due execution of the foregoing Deed of Distribution.

Witness my hand and seal this the 7 day of May, 2022.

Premchand Kodali
(Signature of Notary Public)
PREMCHAND KODALI
(Print name of Notary Public)
Notary Public for State of Georgia
My Commission Expires: 10/18/2022



Note: It is recommended that an attorney prepare this document and determine if a title examination is necessary.

Exhibit A

ALL that lot, of land situate, lying, and being in Christ Church Parish, County of Charleston and State aforesaid known as lot one hundred and ninety-five in Christ Church Parish, Charleston County and State aforesaid being the same lot conveyed to Hardy Green by the Charleston Land Company on the second day of January 1914 and recorded in the Office of the Register of Deeds for Charleston County August 20, 1917 in Book U-28 page three.

Being the same property conveyed to George Lee Brown by deed of Joseph Green dated April 20, 1988 and recorded on June 9, 1989 in the Office of the Register of Deeds for Charleston County in Book A185, Page 433.

RECORDER'S PAGE

NOTE: This page **MUST** remain
with the original document



Filed By:

PMC LAW FIRM
504 W 5TH NORTH ST

SUMMERVILLE SC 29483

RECORDED

Date: June 2, 2022

Time: 11:10:56 AM

Book

Page

DocType

1113

766

Deed/Dist

Michael Miller, Register
Charleston County, SC

MAKER:

BROWN GEORGE L EST

RECIPIENT:

BROWN DANIELLE C AL

Note:

of Pages: 4

Recording Fee \$ 15.00

State Fee \$ -

County Fee \$ -

Extra Pages \$ -

Postage \$ -

Chattel \$ -

TOTAL \$ 15.00

Original Book:

Original Page:

AUDITOR STAMP HERE

RECEIVED From ROD

Aug 03, 2022

Peter J. Tecklenburg

Charleston County Auditor

PID VERIFIED BY ASSESSOR

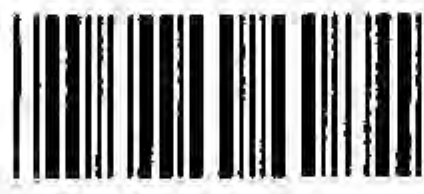
REP JBA

DATE 08/04/2022

DRAWER 8
CLERK ANF



1113
Book



766
Page



06/02/2022
Recorded Date



4
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Original Book



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11:10:56
Recorded Time

EXHIBIT B
Order for Entry of Default

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2024-09-17 09:26:14 page 2 of 2

EXHIBIT C
Affidavit of Publication

Logan Davis Graves & Davis LLC
 125E Wappoo Creek Drive, Suite 102
 CHARLESTON SC 29412

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina

County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of appeared in the issues of said newspaper Post and Courier on the following day(s):
 05/22/24, 05/29/24, 06/05/24

JUN 05 2024

Subscribed and sworn to before me this:

5th day of June, 2024

Conie Poe
 Advertising Clerk

Christina J. Robes-Teasley
 NOTARY PUBLIC, SC
 My commission expires

STATE OF
 SOUTH CAROLINA
 COUNTY OF
 CHARLESTON
 IN THE
 COURT OF
 COMMON PLEAS
 FOR THE
 NINTH JUDICIAL
 CIRCUIT
 C/A No.:
 2023-CP-10-06212
 SUMMONS
 (Non-Jury, Partition)
 DANIELLE C. BROWN,
 Plaintiff,

v.
 CRYSTAL BROWN
 NWANERI,
 Defendant.
 TO THE DEFENDANT
 ABOVE NAMED:
 YOU ARE HEREBY
 SUMMONED and required
 to answer the Complaint in
 this action, a copy of which
 is hereby served upon you,
 and to serve a copy of your
 Answer to said Complaint
 upon Plaintiff or its coun-
 sel, S. Tyler Graves and
 Logan S. Davis, at 125
 Wappoo Creek Drive,
 Building E, Suite 102,
 Charleston, South Carolina
 29412, within thirty (30)
 days after service hereof,
 exclusive of the day of such
 service, and if you fail to
 Answer the Complaint
 within the time aforesaid,
 Plaintiff will apply to the
 Court for the relief
 demanded in the
 Complaint.
 Respectfully submitted,
 GRAVES & DAVIS, LLC
 s/ Logan S. Davis
 Logan S. Davis, Esq.
 (S.C. Bar # 104429)
 S. Tyler Graves, Esq.
 (S.C. Bar # 103173)
 125E Wappoo Creek Dr.,
 Ste. 102
 Charleston, South Carolina
 29412
 P: 843-805-4649 /
 F: 843-620-1047
 ldavis@gravesdavis.com
 tgraves@gravesdavis.com
 Attorneys for Plaintiff
 December 21, 2023
 Charleston, South Carolina
 AD# 2070381

CHRISTINA J. ROBES-TEASLEY
 Notary Public
 State of South Carolina
 My Commission Expires Mar 15, 2032

EXHIBIT D

Notice of Original Hearing FedEx tracking #771449779691

Notice of Original Hearing FedEx tracking #771449731962

ORIGIN ID: RBWA (843) 805-4649
GRAVES DAVIS LLC

SHIP DATE: 15JAN25
ACTWGT: 0.50 LB
CAD: 250649294/NET 4820

1730 CENTRAL PARK ROAD

CHARLESTON, SC 29412

UNITED STATES US

BILL SENDER

TO CRYSTAL BROWN NWANERI

17293 OAKWOOD LODGE LANE

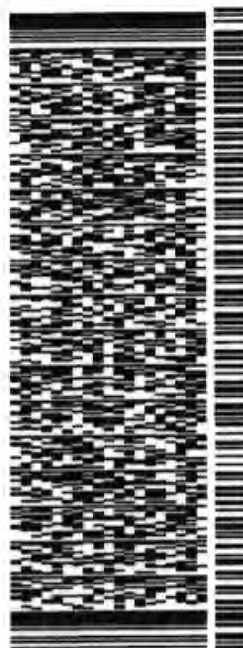
PINEY POINT MD 20674

(843) 805-4649

REF:

PO:

DEPT:



J251924121781uv

58CJ3/EC17/C6C4

TRK# 7714 4973 1962
0201

THU - 16 JAN 5:00P

PRIORITY OVERNIGHT

DSR RES

20674

XS FMEA

MD-US IAD



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



GRAVES & DAVIS

Attorneys at Law

LOCATION
1730 Central Park Road
Charleston, SC 29412

ATTORNEYS
Tyler Graves, *Attorney* (SC)
Logan Davis, *Attorney* (SC)
Harrison Benefield, *Attorney* (SC) (GA)
Lindsay Barton, *Attorney* (SC)
Seth Manaker, *Of Counsel* (SC)

CONTACT
P: (843) 805-4649
F: (843) 620-1047

January 15, 2025

SENT VIA FEDEX

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
Piney Point, MD 20674

Re: Danielle C. Brown v. Crystal Brown Nwaneri
Case No.: 2023-CP-10-06212, Master-in-Equity Court for Charleston County, South Carolina

Dear Ms. Nwaneri:

Pursuant to the South Carolina Rules of Civil Procedure, enclosed please find a Notice of Hearing in the above-referenced matter.

As a courtesy, we are also providing you with copies of all filings of record in this case, which include:

1. Summons and Complaint
2. Notice
3. Lis Pendens
4. Affidavits of Non-Service
5. Order of Publication
6. Motion of Entry of Default and related affidavits
7. Order for Entry of Default
8. Order of Reference

Please review these documents carefully. If you have any questions about your legal rights or obligations, you may wish to consult with an attorney.

Sincerely,


Logan S. Davis, Esq.
1730 Central Park Road
Charleston, SC 29412
Phone: (843) 805-4649
Fax: (843) 620-1047
Ldavis@gravesdavis.com

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

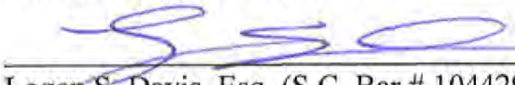
NOTICE OF HEARING

TO: DEFENDANT CRYSTAL BROWN NWANERI

YOU WILL PLEASE TAKE NOTICE that a partition hearing in this matter will be held on January 29, 2025 at 3:00 PM before the Honorable Mikell R. Scarborough, Master-In-Equity/Special Referee for Charleston County, at the Charleston County Judicial Center, 100 Broad Street, Suite 266, Charleston, SC 29401.

Respectfully submitted,

GRAVES & DAVIS, LLC


Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
tgraves@gravesdavis.com
ldavis@gravesdavis.com
Attorneys for Plaintiff

January 15, 2025
Charleston, South Carolina



Charleston County

Court Rosters

Pending Cases Search Clerk of Court Home Return To Roster Selection Jury & Non Jury Trial Roster Clerk of Court Chat

Court Agency	10003	Judge	Scarborough	Roster Description	Master in Equity Docket for January 29, 2025
Roster Type	Master's Hearings	Roster Begin Date	01/29/2025	Roster End Date	01/29/2025
Roster Id	2449	Roster Begin Time	10:00 AM		

Attorney Bar Number		Case #		Filed From		Filed Thru		Search		Print Roster	
#	Scheduled Date	Start Time	Duration Hrs:Mins	Description	Filing Party	Filed Date	Case / Case Caption	Sub Type	Tax Map	Plaintiff Attorney	Defendant
1	01/29/2025	10:00 AM	1:0	Master/Damages Hearing-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kerith L (843) 8E
2	01/29/2025	10:00 AM		Master/Motion to Dismiss-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kerith L (843) 8E
3	01/29/2025	11:00 AM	1:0	Master/Partition Hearing-Jan. 29 at 11:00	Letisha Jackson Adams-PLT	12/31/2024	2024CP1001100 Letisha Jackson Adams VS Lamar D Jackson , defendant, et al	Partition 440	5350400032	J. Christopher Lanning (843) 766-5576	Conrad L. (843) 57 Ittrich, J. J (843) 2C
4	01/29/2025	2:00 PM	1:0	Master/Valuation Hearing-Jan. 29 at 2:00	Ada Bennett-PLT	12/31/2024	2019CP1000395 Ada Bennett , plaintiff, et al VS Edward Meyers , defendant, et al	Real Prop/Other 499	5830000055 5830000065 5830000077	Willie Bruce Heyward (843) 225-8754 John Fulton Knobeloch (843) 884-3670	Kelvin D Mai (843) 57 Thomas B (843) 24 Kyle Var (843) 7E
5	01/29/2025	3:00 PM	1:0	Master/Partition Hearing-Jan. 29 at 3:00	Danielle C Brown-PLT	12/31/2024	2023CP1006212 Danielle C Brown VS Crystal Brown Nwaneri	Partition 440	9850600026	Logan Steele Davis (843) 860-8969 Stephen Tyler Graves (843) 727-5741	

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**SUMMONS
(Non-Jury, Partition)**

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to said Complaint upon Plaintiff or its counsel, S. Tyler Graves and Logan S. Davis, at 125 Wappoo Creek Drive, Building E, Suite 102, Charleston, South Carolina 29412, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to Answer the Complaint within the time aforesaid, Plaintiff will apply to the Court for the relief demanded in the Complaint.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**COMPLAINT
(Non-Jury, Partition)**

Plaintiff, Danielle C. Brown, by and through her undersigned counsel, alleges and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, Danielle C. Brown ("Plaintiff"), is a citizen and resident of Smyrna, Georgia.
2. Defendant, Crystal Brown Nwaneri ("Defendant") is a citizen and resident of Piney Point, Maryland.
3. The real property that is the subject of this action, and which Plaintiff and Defendant own together as tenants in common, is located in Charleston County, South Carolina.
4. This Court has jurisdiction over both the subject matter and parties to this action.
5. Venue in Charleston County, South Carolina is proper.

FACTUAL ALLEGATIONS

6. The preceding paragraphs are repeated as if set forth verbatim herein.
7. The real property subject to this action is located at 8297 Delhi Road, North Charleston, SC 29406 (the "Property").
8. The Property can more fully be described as

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

9. Plaintiff and Defendant are sisters, and the children of George Lee Brown.
10. George Lee Brown died intestate on April 9, 2018.
11. George Lee Brown owned the Property at the time of his death.
12. Plaintiff and Defendant were the sole heirs to the estate of George Lee Brown.
13. Plaintiff was appointed personal representative of the estate of George Lee Brown on September 30, 2021.
14. Plaintiff, in her capacity as personal representative, executed a deed of distribution to Plaintiff and Defendant on May 7, 2022. The deed of distribution was recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.
15. Accordingly, Plaintiff and Defendant each own an undivided fifty percent (50%) interest in the Property.
16. Upon information and belief, there is no mortgage encumbering the Property.
17. Plaintiff wishes to sell the Property.
18. Defendant refuses to sell the Property.

FOR A FIRST CAUSE OF ACTION
(Partition Action)

19. The preceding paragraphs are repeated as if set forth verbatim herein.

20. Pursuant to S.C. Code Ann. §§15-61-10, et. seq., partition of the Property is compellable between the Plaintiff and Defendant as joint tenants, subject to all rights of first refusal, appraisal, and notice as directed by law.

21. The Property does not constitute heirs' property and is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act.

22. Plaintiff is entitled to an order compelling partition of the Property by allotment or by sale as provided by law, with apportionment and division of the new sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests, and affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity commensurate with the parties' respective contributions and improvements towards the Property.

WHEREFORE, Plaintiff prays that this Honorable Court issue its Order:

- A. Compelling partition of the Property by allotment or by sale as provided by law, apportioning and dividing the net sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests and share, affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity as pled herein;
- B. Awarding Plaintiff's attorneys' fees and costs as provided by law; and
- C. All other such relief as may be just and proper.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

NOTICE

(S.C. Code Ann. §15-61-25)

TO THE DEFENDANT ABOVE-NAMED:

As a non-petitioning party/joint tenant/tenant in common in this action, this notice is provided pursuant to Section 15-61-2S, South Carolina Code of Laws. Please review the below and take note of all rights, responsibilities, and timeframes for performance and notices to the Court should you elect to exercise the rights so stated:

SECTION 15-61-25. RIGHT OF FIRST REFUSAL OF JOINT TENANT OR TENANT IN COMMON TO PURCHASE PROPERTY PRIOR TO PARTITION; PROCEDURE.

- (A) For the purposes of this section, "joint tenants and tenants in common" include heirs or devisees. Upon the filing of a petition for partition of real property owned by joint tenants or tenants in common, the court shall provide for the non-petitioning joint tenants or tenants in common who are interested in purchasing the property to notify the court of that interest no later than ten days prior to the date set for the trial of the case. The non-petitioning joint tenants or tenants in common shall be allowed to purchase the interests in the property as provided in this section whether default has been entered against them or not.
- (B) In the circumstances described in subsection (A) of this section, and in the event the parties cannot reach agreement as to the price, the value of the interest or interests to be sold shall be determined by one or more competent real estate appraisers, as the court shall approve, appointed for that purpose by the court. The appraisers appointed pursuant to this section shall make their report in writing to the court within thirty days after their appointment. The costs of the appraisers appointed pursuant to this section shall be taxed as a part of the cost of court to those seeking to purchase the interests of the joint tenants or tenants in common petitioning to sell their interest in the property described in the petition for partition.

- (C) In the event that the petitioning joint tenants or tenants in common object to the value of the interests as determined by the appointed appraisers, those joint tenants or tenants in common shall have ten days from the date of filing of the report to file written notice of objection to the report and request a hearing before the court on the value. An evidentiary hearing limited to the proposed valuation of the interests of the petitioning joint tenants or tenants in common shall be conducted, and an order as to the valuation of the interests of the petitioning joint tenants or tenants in common shall be issued.
- (D) After the valuation of the interest in property is completed as provided in subsection (B) or (C) of this section, the nonpetitioning joint tenants or tenants in common seeking to purchase the interests of those filing the petition shall have forty-five days to pay into the court the price set as the value of those interests to be purchased. Upon the payment and approval of it by the court, the court shall execute and deliver or cause to be executed and delivered the proper instruments transferring title to the purchasers.
- (E) In the event that the nonpetitioning joint tenants or tenants in common fail to pay the purchase price as provided in subsection (D) of this section, the court shall proceed according to its traditional practices in partition sales.

HISTORY: 2006 Act No. 302, Section 1, eff May 25, 2006, applicable to all petitions for partition filed after that date.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023
Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

LIS PENDENS

NOTICE IS HEREBY GIVEN that an action will be commenced and is pending in this Court upon the Complaint of the Plaintiff above-named against the above-named Defendant. Plaintiff seeks equitable partition of the property as provided in Section 15-61-10, et seq., South Carolina Code of Laws, 1976, as amended, together with such incidental relief as may be provided in the statutes and case law of the State of South Carolina.

At the time of filing this notice, the property affected by this action is located in Charleston County, State of South Carolina, and described as follows:

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

Reference to said deed is craved.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

VS:

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF
SUMMONS, COMPLAINT; NOTICE, LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: 17293 Oakwood Lodge Lane, Piney Point, MD 20674 and was unable to effect service for the following reasons:

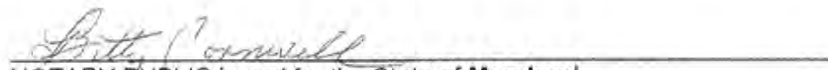
3/4/2024 4:30 PM: Refused to answer the door. I spoke with a neighbor who says subject resides.
3/10/2024 5:01 PM: There was no answer at the address. I spoke with a neighbor who says subject resides.
3/13/2024 5:39 PM: Noise heard inside refused to answer door. I spoke with a neighbor who says subject resides.
3/17/2024 10:08 AM: I spoke with an individual who identified themselves as the resident. I spoke with a neighbor who says subject resides. Refused to open the door

Date:

3-25-24


Timothy Allen

SUBSCRIBED AND SWORN to before me this 25 day of March, 2024


NOTARY PUBLIC in and for the State of Maryland
My commission expires 12-7-2024



IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

vs.

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF:

SUMMONS; COMPLAINT; NOTICE; LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve Crystal Brown Nwaneri at the address of: 17293 Oakwood Lodge Lane, Piney Point, MD 20674 and was unable to effect service for the following reasons:

1/10/2024 5:04 PM: There was no answer at the address.

1/10/2024 6:09 PM: There was no answer at the address.

1/12/2024 9:41 AM: There was no answer at the address. Heard young child say mommy. Waited no one came to the door

1/14/2024 11:18 AM: There was no answer at the address. White Lincoln navigator in driveway Maryland tags 6FA5205. Heard movement and voices. No one answered the door.

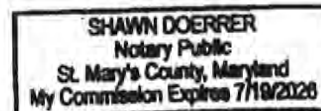
1/16/2024 11:55 AM: There was no answer at the address. Lights on. Vehicles in driveway. Rang door bell, knocked numerous times. No one would answer the door. Pictures uploaded of vehicles.

Date: 1/17/24


Jessica Lada

SUBSCRIBED AND SWORN to before me this 17th day of January, 2024.


Shawn Doerrer
NOTARY PUBLIC in and for the State of Maryland
My commission expires 07/19/2026



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION AND ORDER FOR
SERVICE BY PUBLICATION**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, Danielle C. Brown (hereinafter referred to as the "Plaintiff"), by and through her undersigned counsel for purpose effectuating service upon the above-captioned Defendant (hereinafter referred to as "Defendant") move before this Honorable Court, for an Order authorizing service by publication of the above referenced matter, on the basis that the Defendant still has not been personally served. The Plaintiff has not been able to effectuate service pursuant to ordinary means: personal service or substituted service, and upon information and belief, the Defendant is aware of this matter, has made no attempt to provide her whereabouts to any other parties and is actively endeavoring to evade service.

FACTS

1. On or about December 21, 2023, Plaintiff initiated the subject partition action by filing a Summons and Complaint in this Court.
2. Plaintiff obtained Defendant's address from prior knowledge, current legal proceedings, and other public records.
3. Plaintiff hired ABC Legal, a company engaged in the business of performing skip-traces and serving legal documents, to serve the Summons and Complaint on Defendant.

4. ABC Legal attempted service on Defendant on January 10, 2024, January 12, 2024, January 14, 2024, and January 16, 2024. However, these attempts were unsuccessful.
5. ABC Legal returned a signed proof of non-service document which has been filed with this Court.
6. In an attempt to further investigate the location of Defendant, ABC Legal ran a skip trace on Defendant, which confirmed Defendant resides at the location where ABC Legal had attempted service of process on Defendant.
7. Further, ABC Legal or its representatives have spoke with the neighboring property owner(s) and confirmed Defendant lives at the location where ABC Legal had attempted service of process on Defendant.
8. ABC Legal again attempted to serve Defendant following the skip trace on March 4, 2024, March 10, 2024, March 13, 2024, and March 17, 2024.
9. On March 17, 2024, Timothy Allen, a representative of ABC Legal, spoke with an unknown individual who identified themselves as the resident of the location; however, the person refused to open the door.
10. ABC Legal returned a second signed proof of non-service document which has been filed with this Court.
11. To date the Defendant has not attempted to contact Plaintiff's attorney or process server.

APPLICABLE LAW

S.C. Code Ann. § 15-9-710 authorizes service of the summons be made by publication when, after due diligence, the person to be served cannot be found within the State and that fact appears by affidavit to the satisfaction of the court...and it in like manner appears that the cause of action exists against the defendant in respect to whom the service is to be made or that he is a

proper party to an action relating to real property in this state...when the subject of the action is real or personal property in this State and the defendant has or claims a lien or interest, actual or contingent, therein or the relief demanded consists wholly or partly in excluding the defendant from any interest or lien therein.

CONCLUSION OF LAW

Based on this Motion and the affidavits of non-service filed with this Court, which are incorporated herein by reference, I find that the Plaintiff is entitled to effectuate service by publication regarding Defendant.

WHEREFORE, Plaintiff moves this Court for an order of service by publication.

IT IS THEREFORE ORDERED, that Plaintiff is granted leave to effectuate service by publication pursuant to S.C. Code § 15-9-740 in the Post & Courier, a newspaper of common circulation in Charleston County.

_____, 2024.

Presiding Judge for Charleston County

I SO MOVE:

s/Logan S. Davis
Logan S. Davis, Esq.
Graves & Davis, LLC
125 Wappoo Creek Dr.
Bldg. E, Suite 102
Charleston, SC 29412
Phone: 843-805-4649
Facsimile: 843-620-1047
Ldavis@gravesdavis.com
Attorney for the Plaintiffs

Date: April 16, 2024



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Publication

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Logan Davis Graves & Davis LLC
125E Wappoo Creek Drive, Suite 102
CHARLESTON SC 29412

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina

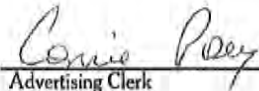
County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of appeared in the issues of said newspaper Post and Courier on the following day(s):
05/22/24, 05/29/24, 06/05/24

JUN 05 2024

Subscribed and sworn to before me this:

5th day of June, 2024


Advertising Clerk


NOTARY PUBLIC, SC
My commission expires

CHRISTINA J. ROBES-TEASLEY
Notary Public
State of South Carolina
My Commission Expires Mar 15, 2032

STATE OF
SOUTH CAROLINA
COUNTY OF
CHARLESTON
IN THE
COURT OF
COMMON PLEAS
FOR THE
NINTH JUDICIAL
CIRCUIT
C/A No.:
2023-CP-10-06212
SUMMONS
(Non-Jury, Partition)
DANIELLE C. BROWN,
Plaintiff,

v.
CRYSTAL BROWN
NWANERI, Defendant.
TO THE DEFENDANT
ABOVE NAMED:
YOU ARE HEREBY
SUMMONED and required
to answer the Complaint in
this action, a copy of which
is hereby served upon you,
and to serve a copy of your
Answer to said Complaint
upon Plaintiff or its counsel,
S. Tyler Graves and
Logan S. Davis, at 125
Wappoo Creek Drive,
Building E, Suite 102,
Charleston, South Carolina
29412, within thirty (30)
days after service hereof,
exclusive of the day of such
service, and if you fail to
Answer the Complaint
within the time aforesaid,
Plaintiff will apply to the
Court for the relief
demanded in the
Complaint.
Respectfully submitted,
GRAVES & DAVIS, LLC
s/ Logan S. Davis
Logan S. Davis, Esq.
(S.C. Bar # 104429)
S. Tyler Graves, Esq.
(S.C. Bar # 103173)
125E Wappoo Creek Dr.,
Ste. 102
Charleston, South Carolina
29412
P: 843-805-4649 /
F: 843-620-1047
ldavis@gravesdavis.com
tgraves@gravesdavis.com
Attorneys for Plaintiff
December 21, 2023
Charleston, South Carolina
ADA# 2070381

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT
CRYSTAL BROWN NWANERI**

The Plaintiff, by and through her undersigned counsel, hereby requests the Honorable Clerk of Court for an Entry of Default against Defendant Crystal Brown Nwaneri, pursuant to Rule 55(a) of the South Carolina Rules of Civil Procedure.

The basis of this Motion is that the Defendant Crystal Brown Nwaneri was served with the Lis Pendens, Summons and Complaint on June 5, 2024 and has failed to file an Answer or other responsive pleading.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 16, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

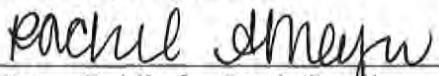
**AFFIDAVIT OF
NON-MILITARY SERVICE**

PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is familiar with the provisions of 50 USC.A App. §520, Soldiers' and Sailors' Civil Relief Act of 1940, and to induce the Court to enter a default judgment against Defendant Crystal Brown Nwaneri represents to this Court, that from review of the file in this matter, the said Defendant does not appear to be in the Military Service of the United States and is not entitled to protection of the Soldiers' and Sailors' Civil Relief Act of 1940 nor any amendments thereof.



Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.



Notary Public for South Carolina

My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

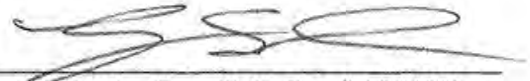
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

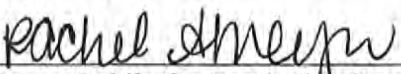
AFFIDAVIT OF DEFAULT

PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is an attorney at law, and represents the Plaintiff herein; that the Lis Pendens, Summons and Complaint in this action were duly served on the Defendant Crystal Brown Nwaneri, on June 5, as it appears from the proof of the same on record with the Clerk of Court; that more than thirty (30) days have elapsed since the completion of said service upon the Defendant, and that the Defendant is now in default, no answer having been served by Defendant, nor her attorney. Plaintiff requests an Entry of Default against Defendant Crystal Brown Nwaneri.



Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.


Notary Public for South Carolina
My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION FOR REFERENCE TO THE
MASTER-IN-EQUITY**

Plaintiff commenced this action in equity to partition by sale certain real property located in Charleston County, South Carolina. Plaintiff hereby moves this Court to issue an Order of Reference, pursuant to Rule 53(b), SCRCF, referring this equitable proceeding to the Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, for the purpose of receiving evidence and with all appeals to be made directly to the South Carolina Court of Appeals.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 17, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER OF REFERENCE TO
THE MASTER-IN-EQUITY**

UPON reading the Plaintiff's Motion for Reference to the Master-in-Equity, and upon consideration of same, and it being made to appear to my satisfaction that this matter involves a partition action to real property.

THEREFORE, IT IS ORDERED, ADJUDGED and DECREED that this case be, and the same is hereby, referred pursuant to SCRCP Rule 53 to The Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, to take testimony and issue a Final Decree, with any appeal from the Master to be directly to the South Carolina Supreme Court or the Court of Appeals.

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Master-in-Equity is given authority to hear any and all post-trial motions, including, but not limited to, motions under Rules 52, 59 and 60, SCRCP.

AND IT IS SO ORDERED!

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Referred to Master or Special Referee

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

ORIGIN ID: RMA
GRAVES DAVIS LLC
(843) 805-4649

SHIP DATE: 15 JAN 25
ACTWGHT: 0.50 LB
CAD: 256649294INET4820

1730 CENTRAL PARK ROAD

CHARLESTON, SC 29412

UNITED STATES US

BILL SENDER

TO CRYSTAL BROWN NWANERI

17293 OAKWOOD LODGE LANE

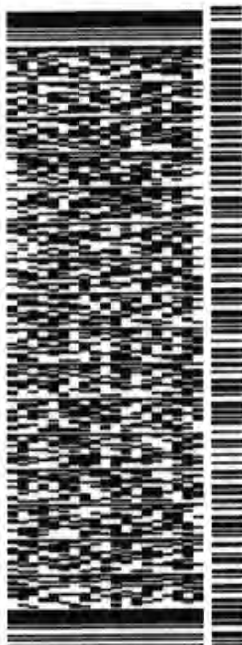
PINEY POINT MD 20674

(843) 805-4649

REF:

PO:

DEPT:



J251824121781uv

5BCJ3/EC17/C6C4

TRK# 7714 4977 9691
0201

THU - 16 JAN 5:00P

PRIORITY OVERNIGHT

RES

20674

XS FMEA

MD-US IAD



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GRAVES & DAVIS

Attorneys at Law

LOCATION
1730 Central Park Road
Charleston, SC 29412

ATTORNEYS
Tyler Graves, *Attorney* (SC)
Logan Davis, *Attorney* (SC)
Harrison Benefield, *Attorney* (SC) (GA)
Lindsay Barton, *Attorney* (SC)
Seth Manaker, *Of Counsel* (SC)

CONTACT
P: (843) 805-4649
F: (843) 620-1047

January 15, 2025

SENT VIA FEDEX

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
Piney Point, MD 20674

Re: Danielle C. Brown v. Crystal Brown Nwaneri
Case No.: 2023-CP-10-06212, Master-in-Equity Court for Charleston County, South Carolina

Dear Ms. Nwaneri:

Pursuant to the South Carolina Rules of Civil Procedure, enclosed please find a Notice of Hearing in the above-referenced matter.

As a courtesy, we are also providing you with copies of all filings of record in this case, which include:

1. Summons and Complaint
2. Notice
3. Lis Pendens
4. Affidavits of Non-Service
5. Order of Publication
6. Motion of Entry of Default and related affidavits
7. Order for Entry of Default
8. Order of Reference

Please review these documents carefully. If you have any questions about your legal rights or obligations, you may wish to consult with an attorney.

Sincerely,


Logan S. Davis, Esq.
1730 Central Park Road
Charleston, SC 29412
Phone: (843) 805-4649
Fax: (843) 620-1047
Ldavis@gravesdavis.com

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

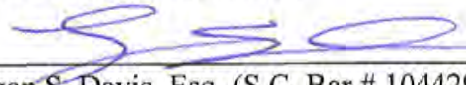
NOTICE OF HEARING

TO: DEFENDANT CRYSTAL BROWN NWANERI

YOU WILL PLEASE TAKE NOTICE that a partition hearing in this matter will be held on January 29, 2025 at 3:00 PM before the Honorable Mikell R. Scarborough, Master-In-Equity/Special Referee for Charleston County, at the Charleston County Judicial Center, 100 Broad Street, Suite 266, Charleston, SC 29401.

Respectfully submitted,

GRAVES & DAVIS, LLC


Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
tgraves@gravesdavis.com
ldavis@gravesdavis.com
Attorneys for Plaintiff

January 15, 2025
Charleston, South Carolina



Charleston County
Court Rosters

Pending Cases Search Clerk of Court Home Return To Roster Selection Jury & Non Jury Trial Roster Clerk of Court Chat

Court Agency	10003	Judge	Scarborough	Roster Description	Master in Equity Docket for January 29, 2025
Roster Type	Master's Hearings	Roster Begin Date	01/29/2025	Roster End Date	01/29/2025
Roster Id	2449	Roster Begin Time	10:00 AM		

Attorney Bar Number	Case #	Filed From	Filed Thru								
#	Scheduled Date	Start Time	Duration Hrs:Mins	Description	Filing Party	Filed Date	Case / Case Caption	Sub Type	Tax Map	Plaintiff Attorney	Defendant
1	01/29/2025	10:00 AM	1:0	Master/Damages Hearing-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kenneth L (843) 8E
2	01/29/2025	10:00 AM		Master/Motion to Dismiss-Jan. 29 at 10:00	Willtown Outpost Lic-PLT	12/31/2024	2023CP1004533 Willtown Outpost Lic VS Freeman Quick Stop Lic , defendant, et al	Breach of Cont 140		William King Kalivas (843) 760-0220	Kenneth L (843) 8E
3	01/29/2025	11:00 AM	1:0	Master/Partition Hearing-Jan. 29 at 11:00	Letisha Jackson Adams-PLT	12/31/2024	2024CP1001100 Letisha Jackson Adams VS Lamar D Jackson , defendant, et al	Partition 440	5350400032	J. Christopher Lanning (843) 766-5576	Conrad L. (843) 57 Ittrich, J. J (843) 2C
4	01/29/2025	2:00 PM	1:0	Master/Valuation Hearing-Jan. 29 at 2:00	Ada Bennett-PLT	12/31/2024	2019CP1000395 Ada Bennett , plaintiff, et al VS Edward Meyers , defendant, et al	Real Prop/Other 499	5830000055 5830000065 5830000077	Willie Bruce Heyward (843) 225-8754 John Fulton Knobloch (843) 884-3670	Kelvin Ma (843) 57 Thomas B (843) 24 Kyle Var (843) 76
5	01/29/2025	3:00 PM	1:0	Master/Partition Hearing-Jan. 29 at 3:00	Danielle C Brown-PLT	12/31/2024	2023CP1006212 Danielle C Brown VS Crystal Brown Nwaneri	Partition 440	9850600026	Logan Steele Davis (843) 860-8969 Stephen Tyler Graves (843) 727-5741	

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**SUMMONS
(Non-Jury, Partition)**

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to said Complaint upon Plaintiff or its counsel, S. Tyler Graves and Logan S. Davis, at 125 Wappoo Creek Drive, Building E, Suite 102, Charleston, South Carolina 29412, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to Answer the Complaint within the time aforesaid, Plaintiff will apply to the Court for the relief demanded in the Complaint.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

**COMPLAINT
(Non-Jury, Partition)**

Plaintiff, Danielle C. Brown, by and through her undersigned counsel, alleges and states as follows:

PARTIES AND JURISDICTION

1. Plaintiff, Danielle C. Brown ("Plaintiff"), is a citizen and resident of Smyrna, Georgia.
2. Defendant, Crystal Brown Nwaneri ("Defendant") is a citizen and resident of Piney Point, Maryland.
3. The real property that is the subject of this action, and which Plaintiff and Defendant own together as tenants in common, is located in Charleston County, South Carolina.
4. This Court has jurisdiction over both the subject matter and parties to this action.
5. Venue in Charleston County, South Carolina is proper.

FACTUAL ALLEGATIONS

6. The preceding paragraphs are repeated as if set forth verbatim herein.
7. The real property subject to this action is located at 8297 Delhi Road, North Charleston, SC 29406 (the "Property").
8. The Property can more fully be described as

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

9. Plaintiff and Defendant are sisters, and the children of George Lee Brown.
10. George Lee Brown died intestate on April 9, 2018.
11. George Lee Brown owned the Property at the time of his death.
12. Plaintiff and Defendant were the sole heirs to the estate of George Lee Brown.
13. Plaintiff was appointed personal representative of the estate of George Lee Brown on September 30, 2021.
14. Plaintiff, in her capacity as personal representative, executed a deed of distribution to Plaintiff and Defendant on May 7, 2022. The deed of distribution was recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.
15. Accordingly, Plaintiff and Defendant each own an undivided fifty percent (50%) interest in the Property.
16. Upon information and belief, there is no mortgage encumbering the Property.
17. Plaintiff wishes to sell the Property.
18. Defendant refuses to sell the Property.

FOR A FIRST CAUSE OF ACTION
(Partition Action)

19. The preceding paragraphs are repeated as if set forth verbatim herein.

20. Pursuant to S.C. Code Ann. §§15-61-10, et. seq., partition of the Property is compellable between the Plaintiff and Defendant as joint tenants, subject to all rights of first refusal, appraisal, and notice as directed by law.

21. The Property does not constitute heirs' property and is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act.

22. Plaintiff is entitled to an order compelling partition of the Property by allotment or by sale as provided by law, with apportionment and division of the new sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests, and affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity commensurate with the parties' respective contributions and improvements towards the Property.

WHEREFORE, Plaintiff prays that this Honorable Court issue its Order:

- A. Compelling partition of the Property by allotment or by sale as provided by law, apportioning and dividing the net sales proceeds between the Plaintiff and Defendant following an accounting by the parties of their respective interests and share, affording unto each of them any required setoffs and reimbursements that are due and owing at law or in equity as pled herein;
- B. Awarding Plaintiff's attorneys' fees and costs as provided by law; and
- C. All other such relief as may be just and proper.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

NOTICE

(S.C. Code Ann. §15-61-25)

TO THE DEFENDANT ABOVE-NAMED:

As a non-petitioning party/joint tenant/tenant in common in this action, this notice is provided pursuant to Section 15-61-25, South Carolina Code of Laws. Please review the below and take note of all rights, responsibilities, and timeframes for performance and notices to the Court should you elect to exercise the rights so stated:

SECTION 15-61-25. RIGHT OF FIRST REFUSAL OF JOINT TENANT OR TENANT IN COMMON TO PURCHASE PROPERTY PRIOR TO PARTITION; PROCEDURE.

- (A) For the purposes of this section, "joint tenants and tenants in common" include heirs or devisees. Upon the filing of a petition for partition of real property owned by joint tenants or tenants in common, the court shall provide for the non-petitioning joint tenants or tenants in common who are interested in purchasing the property to notify the court of that interest no later than ten days prior to the date set for the trial of the case. The non-petitioning joint tenants or tenants in common shall be allowed to purchase the interests in the property as provided in this section whether default has been entered against them or not.
- (B) In the circumstances described in subsection (A) of this section, and in the event the parties cannot reach agreement as to the price, the value of the interest or interests to be sold shall be determined by one or more competent real estate appraisers, as the court shall approve, appointed for that purpose by the court. The appraisers appointed pursuant to this section shall make their report in writing to the court within thirty days after their appointment. The costs of the appraisers appointed pursuant to this section shall be taxed as a part of the cost of court to those seeking to purchase the interests of the joint tenants or tenants in common petitioning to sell their interest in the property described in the petition for partition.

- (C) In the event that the petitioning joint tenants or tenants in common object to the value of the interests as determined by the appointed appraisers, those joint tenants or tenants in common shall have ten days from the date of filing of the report to file written notice of objection to the report and request a hearing before the court on the value. An evidentiary hearing limited to the proposed valuation of the interests of the petitioning joint tenants or tenants in common shall be conducted, and an order as to the valuation of the interests of the petitioning joint tenants or tenants in common shall be issued.
- (D) After the valuation of the interest in property is completed as provided in subsection (B) or (C) of this section, the nonpetitioning joint tenants or tenants in common seeking to purchase the interests of those filing the petition shall have forty-five days to pay into the court the price set as the value of those interests to be purchased. Upon the payment and approval of it by the court, the court shall execute and deliver or cause to be executed and delivered the proper instruments transferring title to the purchasers.
- (E) In the event that the nonpetitioning joint tenants or tenants in common fail to pay the purchase price as provided in subsection (D) of this section, the court shall proceed according to its traditional practices in partition sales.

HISTORY: 2006 Act No. 302, Section 1, eff May 25, 2006, applicable to all petitions for partition filed after that date.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023
Charleston, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: _____

LIS PENDENS

NOTICE IS HEREBY GIVEN that an action will be commenced and is pending in this Court upon the Complaint of the Plaintiff above-named against the above-named Defendant. Plaintiff seeks equitable partition of the property as provided in Section 15-61-10, et seq., South Carolina Code of Laws, 1976, as amended, together with such incidental relief as may be provided in the statutes and case law of the State of South Carolina.

At the time of filing this notice, the property affected by this action is located in Charleston County, State of South Carolina, and described as follows:

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon, situate, lying and being in Charleston County, South Carolina, known and designated as Lot 8, Block CC, on a plat of Northwood Estates Subdivision, made by Sigma Engineers, Inc., dated February 8, 1971, and recorded in the Office of the Register of Deeds for Charleston County in Plat Book AA, at page 36, the said plat being entitled "Plat of Northwood Estates, Section 3, North Charleston (unincorporated), Charleston County, South Carolina," said lot having such size, shape and dimensions, more or less, as are shown on the said plat.

BEING the same property conveyed to Danielle C. Brown and Crystal Brown Nwaneri by deed of distribution from the Estate of George Lee Brown (Estate No. 2021ES1000886) dated May 7, 2022 and recorded on June 2, 2022 in the Office of the Register of Deeds for Charleston County in Book 1113, at page 766.

TMS No. 985-06-00-026

Reference to said deed is craved.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/ Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

December 21, 2023

Charleston, South Carolina

IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

VS.

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF:
SUMMONS, COMPLAINT, NOTICE, LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: **17293 Oakwood Lodge Lane, Piney Point, MD 20674** and was unable to effect service for the following reasons:

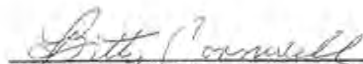
3/4/2024 4:30 PM: Refused to answer the door. I spoke with a neighbor who says subject resides.
3/10/2024 5:01 PM: There was no answer at the address. I spoke with a neighbor who says subject resides.
3/13/2024 5:39 PM: Noise heard inside refused to answer door. I spoke with a neighbor who says subject resides.
3/17/2024 10:08 AM: I spoke with an individual who identified themselves as the resident. I spoke with a neighbor who says subject resides. Refused to open the door

Date:

3-25-24


Timothy Allen

SUBSCRIBED AND SWORN to before me this 25 day of March, 2024


NOTARY PUBLIC in and for the State of Maryland

My commission expires 12-7-2024



IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR CHARLESTON COUNTY

DANIELLE C BROWN

Plaintiff/Petitioner

DOCKET NO: 2023CP1006212

FILING DATE: 12/21/2023

vs.

CRYSTAL BROWN NWANERI

Defendant/Respondent

AFFIDAVIT OF NON-SERVICE OF:
SUMMONS; COMPLAINT; NOTICE; LIS PENDENS

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

Affiant states s(he) attempted to serve **Crystal Brown Nwaneri** at the address of: **17293 Oakwood Lodge Lane, Piney Point, MD 20674** and was unable to effect service for the following reasons:

1/10/2024 5:04 PM: There was no answer at the address.

1/10/2024 6:09 PM: There was no answer at the address.

1/12/2024 9:41 AM: There was no answer at the address. Heard young child say mommy. Waited no one came to the door

1/14/2024 11:18 AM: There was no answer at the address. White Lincoln navigator in driveway Maryland tags 6FA5205. Heard movement and voices. No one answered the door.

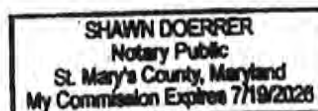
1/16/2024 11:55 AM: There was no answer at the address. Lights on. Vehicles in driveway. Rang door bell, knocked numerous times. No one would answer the door. Pictures uploaded of vehicles.

Date: 1/17/24

Jessica Lada
Jessica Lada

SUBSCRIBED AND SWORN to before me this 17th day of January, 2024.

Shawn Doerrer
NOTARY PUBLIC in and for the State of Maryland
My commission expires 07/19/2026



STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION AND ORDER FOR
SERVICE BY PUBLICATION**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, Danielle C. Brown (hereinafter referred to as the "Plaintiff"), by and through her undersigned counsel for purpose effectuating service upon the above-captioned Defendant (hereinafter referred to as "Defendant") move before this Honorable Court, for an Order authorizing service by publication of the above referenced matter, on the basis that the Defendant still has not been personally served. The Plaintiff has not been able to effectuate service pursuant to ordinary means: personal service or substituted service, and upon information and belief, the Defendant is aware of this matter, has made no attempt to provide her whereabouts to any other parties and is actively endeavoring to evade service.

FACTS

1. On or about December 21, 2023, Plaintiff initiated the subject partition action by filing a Summons and Complaint in this Court.
2. Plaintiff obtained Defendant's address from prior knowledge, current legal proceedings, and other public records.
3. Plaintiff hired ABC Legal, a company engaged in the business of performing skip-traces and serving legal documents, to serve the Summons and Complaint on Defendant.

4. ABC Legal attempted service on Defendant on January 10, 2024, January 12, 2024, January 14, 2024, and January 16, 2024. However, these attempts were unsuccessful.
5. ABC Legal returned a signed proof of non-service document which has been filed with this Court.
6. In an attempt to further investigate the location of Defendant, ABC Legal ran a skip trace on Defendant, which confirmed Defendant resides at the location where ABC Legal had attempted service of process on Defendant.
7. Further, ABC Legal or its representatives have spoke with the neighboring property owner(s) and confirmed Defendant lives at the location where ABC Legal had attempted service of process on Defendant.
8. ABC Legal again attempted to serve Defendant following the skip trace on March 4, 2024, March 10, 2024, March 13, 2024, and March 17, 2024.
9. On March 17, 2024, Timothy Allen, a representative of ABC Legal, spoke with an unknown individual who identified themselves as the resident of the location; however, the person refused to open the door.
10. ABC Legal returned a second signed proof of non-service document which has been filed with this Court.
11. To date the Defendant has not attempted to contact Plaintiff's attorney or process server.

APPLICABLE LAW

S.C. Code Ann. § 15-9-710 authorizes service of the summons be made by publication when, after due diligence, the person to be served cannot be found within the State and that fact appears by affidavit to the satisfaction of the court...and it in like manner appears that the cause of action exists against the defendant in respect to whom the service is to be made or that he is a

proper party to an action relating to real property in this state...when the subject of the action is real or personal property in this State and the defendant has or claims a lien or interest, actual or contingent, therein or the relief demanded consists wholly or partly in excluding the defendant from any interest or lien therein.

CONCLUSION OF LAW

Based on this Motion and the affidavits of non-service filed with this Court, which are incorporated herein by reference, I find that the Plaintiff is entitled to effectuate service by publication regarding Defendant.

WHEREFORE, Plaintiff moves this Court for an order of service by publication.

IT IS THEREFORE ORDERED, that Plaintiff is granted leave to effectuate service by publication pursuant to S.C. Code § 15-9-740 in the Post & Courier, a newspaper of common circulation in Charleston County.

_____, 2024.

Presiding Judge for Charleston County

I SO MOVE:

s/Logan S. Davis
Logan S. Davis, Esq.
Graves & Davis, LLC
125 Wappoo Creek Dr.
Bldg. E, Suite 102
Charleston, SC 29412
Phone: 843-805-4649
Facsimile: 843-620-1047
Ldavis@gravesdavis.com
Attorney for the Plaintiffs

Date: April 16, 2024



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Publication

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Logan Davis Graves & Davis LLC
125E Wappoo Creek Drive, Suite 102
CHARLESTON SC 29412

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina

County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of appeared in the issues of said newspaper Post and Courier on the following day(s):
05/22/24, 05/29/24, 06/05/24

JUN 05 2024

Subscribed and sworn to before me this:

5th day of June, 2024


Advertising Clerk


NOTARY PUBLIC, SC
My commission expires

CHRISTINA J. ROBES-TEASLEY
Notary Public
State of South Carolina
My Commission Expires Mar 15, 2032

STATE OF
SOUTH CAROLINA
COUNTY OF
CHARLESTON
IN THE
COURT OF
COMMON PLEAS
FOR THE
NINTH JUDICIAL
CIRCUIT
C/A No.:
2023-CP-10-06212
SUMMONS
(Non-Jury, Partition)
DANIELLE C. BROWN,
Plaintiff,
v.
CRYSTAL BROWN
NWANERI,
Defendant.
TO THE DEFENDANT
ABOVE NAMED:
YOU ARE HEREBY
SUMMONED and required
to answer the Complaint in
this action, a copy of which
is hereby served upon you,
and to serve a copy of your
Answer to said Complaint
upon Plaintiff or its counsel,
S. Tyler Graves and
Logan S. Davis, at 125
Wappoo Creek Drive,
Building E, Suite 102,
Charleston, South Carolina
29412, within thirty (30)
days after service hereof,
exclusive of the day of such
service, and if you fail to
Answer the Complaint
within the time aforesaid,
Plaintiff will apply to the
Court for the relief
demanded in the
Complaint.
Respectfully submitted,
GRAVES & DAVIS, LLC
s/ Logan S. Davis
Logan S. Davis, Esq.
(S.C. Bar # 104429)
S. Tyler Graves, Esq.
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P: 843-805-4649 /
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tgraves@gravesdavis.com
Attorneys for Plaintiff
December 21, 2023
Charleston, South Carolina
ADR# 2070381

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**NOTICE OF MOTION AND
MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT
CRYSTAL BROWN NWANERI**

The Plaintiff, by and through her undersigned counsel, hereby requests the Honorable Clerk of Court for an Entry of Default against Defendant Crystal Brown Nwaneri, pursuant to Rule 55(a) of the South Carolina Rules of Civil Procedure.

The basis of this Motion is that the Defendant Crystal Brown Nwaneri was served with the Lis Pendens, Summons and Complaint on June 5, 2024 and has failed to file an Answer or other responsive pleading.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 16, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

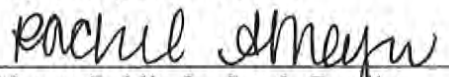
**AFFIDAVIT OF
NON-MILITARY SERVICE**

PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is familiar with the provisions of 50 USC.A App. §520, Soldiers' and Sailors' Civil Relief Act of 1940, and to induce the Court to enter a default judgment against Defendant Crystal Brown Nwaneri represents to this Court, that from review of the file in this matter, the said Defendant does not appear to be in the Military Service of the United States and is not entitled to protection of the Soldiers' and Sailors' Civil Relief Act of 1940 nor any amendments thereof.



Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 14
day of September, 2024.


Notary Public for South Carolina
My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

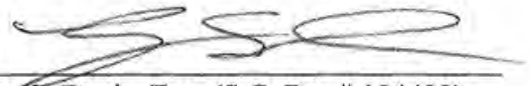
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

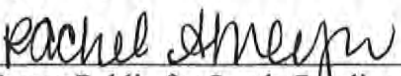
AFFIDAVIT OF DEFAULT

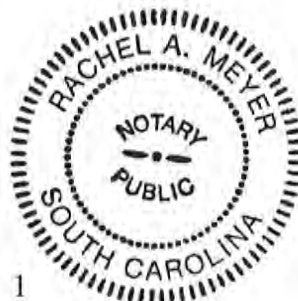
PERSONALLY APPEARED before me the undersigned, who being duly sworn, says that he is an attorney at law, and represents the Plaintiff herein; that the Lis Pends, Summons and Complaint in this action were duly served on the Defendant Crystal Brown Nwaneri, on June 5, as it appears from the proof of the same on record with the Clerk of Court; that more than thirty (30) days have elapsed since the completion of said service upon the Defendant, and that the Defendant is now in default, no answer having been served by Defendant, nor her attorney. Plaintiff requests an Entry of Default against Defendant Crystal Brown Nwaneri.



Logan S. Davis, Esq. (S.C. Bar # 104429)
125E Wappoo Creek Dr., Ste. 102
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com
Attorney for Plaintiff

Sworn to before me this 16
day of September, 2024.


Notary Public for South Carolina
My commission Expires: 01-27-2031



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby,

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a), SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION FOR REFERENCE TO THE
MASTER-IN-EQUITY**

Plaintiff commenced this action in equity to partition by sale certain real property located in Charleston County, South Carolina. Plaintiff hereby moves this Court to issue an Order of Reference, pursuant to Rule 53(b), SCRCF, referring this equitable proceeding to the Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, for the purpose of receiving evidence and with all appeals to be made directly to the South Carolina Court of Appeals.

Respectfully submitted,

GRAVES & DAVIS, LLC

s/Logan S. Davis

Logan S. Davis, Esq. (S.C. Bar # 104429)

S. Tyler Graves, Esq. (S.C. Bar # 103173)

Graves & Davis, LLC

125E Wappoo Creek Dr., Ste. 102

Charleston, South Carolina 29412

P: 843-805-4649 / F: 843-620-1047

ldavis@gravesdavis.com

tgraves@gravesdavis.com

Attorneys for Plaintiff

September 17, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER OF REFERENCE TO
THE MASTER-IN-EQUITY**

UPON reading the Plaintiff's Motion for Reference to the Master-in-Equity, and upon consideration of same, and it being made to appear to my satisfaction that this matter involves a partition action to real property.

THEREFORE, IT IS ORDERED, ADJUDGED and DECREED that this case be, and the same is hereby, referred pursuant to SCRCP Rule 53 to The Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, to take testimony and issue a Final Decree, with any appeal from the Master to be directly to the South Carolina Supreme Court or the Court of Appeals.

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Master-in-Equity is given authority to hear any and all post-trial motions, including, but not limited to, motions under Rules 52, 59 and 60, SCRCP.

AND IT IS SO ORDERED!

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri
Case Number: 2023CP1006212
Type: Order/Referred to Master or Special Referee

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

EXHIBIT E
Successful FedEx Delivery – Signature Not Required
(Notice of Original Hearing)



January 21, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 771449779691

Delivery Information:

Status:	Delivered	Delivered To:	Residence
Signed for by:	Signature not required	Delivery Location:	17293 OAKWOOD LODGE LN
Service type:	FedEx Priority Overnight		
Special Handling:	Deliver Weekday; Residential Delivery		PINEY POINT, MD, 20674
		Delivery date:	Jan 16, 2025 14:24

Shipping Information:

Tracking number:	771449779691	Ship Date:	Jan 15, 2025
		Weight:	0.5 LB/0.23 KG

Recipient: Crystal Brown Nwaneri, 17293 Oakwood Lodge Lane PINEY POINT, MD, US, 20674	Shipper: Graves Davis LLC, 1730 Central Park Road Charleston, SC, US, 29412
---	---

Proof-of-delivery details appear below; however, no signature is available for this FedEx Express shipment because a signature was not required.

Thank you for choosing FedEx

EXHIBIT F
Unsuccessful FedEx Delivery – Signature Required
(Notice of Original Hearing)



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Today

Before 5:00 PM

Your package is at our facility. We'll let you know when it moves again.

DELIVERY STATUS

We tried to deliver



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admin@gravesdavis.com

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MORE OPTIONS

TRACKING ID

771449731962

FROM

Graves Davis LLC
1730 Central Park Road
Charleston, SC US 29412
8438054649

Label Created

ELECTRONICALLY FILED - 2023 Aug 21 2:46 PM - CHARLESTON - COMMON PLEAS - CASE#2023CP1006212



NORTH CHARLESTON, SC
1/15/25 5:42 PM

WE TRIED TO DELIVER

WALDORF, MD
1/21/25 9:36 AM

OUT FOR DELIVERY

WALDORF, MD
1/17/25 8:58 AM

TO

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
PINEY POINT, MD US 20674
8438054649

Scheduled Delivery Date

Today

Before 5:00 PM

↓ [View travel history](#)

Manage delivery

📍 [Hold at location](#)

↶ [Return to shipper](#)



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Shipment facts



Shipment overview

TRACKING NUMBER 771449731962

DOOR TAG NUMBER DT107044594232, DT107106334781



STANDARD TRANSIT [?](#) 1/16/25 before 5:00 PM

SCHEDULED DELIVERY DATE 1/21/25 before 5:00 PM



Services

SERVICE FedEx Priority Overnight

DELIVERY ATTEMPTS 2

TERMS Shipper

SPECIAL HANDLING SECTION Deliver Weekday, Residential Delivery, Direct Signature Required

SIGNATURE SERVICES [?](#) Direct signature required



Package details

WEIGHT 0.5 lbs / 0.23 kgs

TOTAL PIECES 1

TOTAL SHIPMENT WEIGHT 0.5 lbs / 0.23 kgs

PACKAGING FedEx Envelope

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Travel history

SORT BY DATE/TIME

Ascending

Time zone

Local Scan Time

- 10:07 AM
Shipment information sent to FedEx
- 5:42 PM
Picked up
NORTH CHARLESTON, SC
- 5:45 PM
Shipment arriving On-Time
NORTH CHARLESTON, SC
- 7:53 PM
Left FedEx origin facility
NORTH CHARLESTON, SC
- 10:57 PM
Arrived at FedEx hub
MEMPHIS, TN

Thursday, 1/16/25

- 2:47 AM
Departed FedEx hub
MEMPHIS, TN
- 5:21 AM
At destination sort facility
DULLES, VA
- 7:38 AM
At local FedEx facility
WALDORF, MD
- 8:11 AM
On FedEx vehicle for delivery
WALDORF, MD
- 2:25 PM
Delivery exception
Customer not available or business closed
WALDORF, MD
- 2:26 PM
Delivery updated
WALDORF, MD
- 6:35 PM
At local FedEx facility
WALDORF, MD

- 7:52 AM
At local FedEx facility
WALDORF, MD
- 8:58 AM
On FedEx vehicle for delivery
WALDORF, MD
- 12:57 PM
Delivery exception
Customer not available or business closed
WALDORF, MD
- 12:59 PM
Delivery updated
WALDORF, MD
- 6:42 PM
At local FedEx facility
WALDORF, MD

Saturday, 1/18/25

- 9:32 AM
At local FedEx facility
WALDORF, MD

Monday, 1/20/25

- 9:12 AM
At local FedEx facility
WALDORF, MD
- 9:17 AM
Delivery updated
WALDORF, MD

Tuesday, 1/21/25

- ⌚ 9:36 AM
At local FedEx facility
WALDORF, MD

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EXHIBIT G

Notice of August 25, 2025 Hearing

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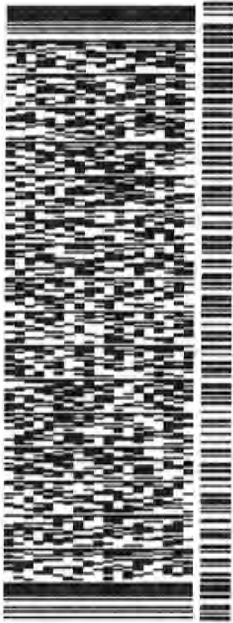
and

Notice of August 25, 2025 Hearing

FedEx tracking #883502697920

8/12/25, 9:20 AM

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BILL SENDER		
TO CRYSTAL BROWN NWANERI		
17293 OAKWOOD LODGE LANE		
PINEY POINT MD 20674		
PO	REF: (843) 805-4649	DEPT:
		
		
TRK# 0201	8835 0269 7920	THU - 14 AUG 5:00P
		** 2DAY **
SP FMEA		ASR 20674
MD-US IAD		
		

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GRAVES & DAVIS
Attorneys at Law

1730 Central Park Road
Charleston, SC 29412
P: (843) 805-4649
F: (843) 620-1047

August 12, 2025

SENT VIA FEDEX

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
Piney Point, MD 20674

Re: Danielle C. Brown v. Crystal Brown Nwaneri
Case No.: 2023-CP-10-06212, Master-in-Equity Court for Charleston County, South Carolina

Dear Ms. Nwaneri:

Pursuant to the South Carolina Rules of Civil Procedure, enclosed please find a Notice of Hearing in the above-referenced matter.

If you have any questions about your legal rights or obligations, you may wish to consult with an attorney.

Sincerely,

Logan S. Davis, Esq.
Graves & Davis, LLC
1730 Central Park Road
Charleston, SC 29412
Phone: (843) 805-4649
Fax: (843) 620-1047
Ldavis@gravesdavis.com

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023CP1006212

NOTICE OF HEARING

TO: DEFENDANT CRYSTAL BROWN NWANERI

YOU WILL PLEASE TAKE NOTICE that a partition hearing in this matter will be held on August 25, 2025 at 2:00 PM before the Honorable Mikell R. Scarborough, Master-In-Equity/Special Referee for Charleston County, at the Charleston County Judicial Center, 100 Broad Street, Suite 266, Charleston, SC 29401.

Respectfully submitted,

GRAVES & DAVIS, LLC



Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047

tgraves@gravesdavis.com

ldavis@gravesdavis.com

Attorneys for Plaintiff

August 12, 2025
Charleston, South Carolina

8/12/25, 9:06 AM

Court Roster Details



Charleston County

Court Rosters

Pending Cases Search Clerk of Court Home Return To Roster Selection Jury & Non Jury Trial Roster Clerk of Court Chat

Court Agency	10003	Judge	Scarborough	Roster Description	Master in Equity Docket for Monday, August 25, 2025
Roster Type	Master's Hearings	Roster Begin Date	08/25/2025	Roster End Date	08/25/2025
Roster Id	2553	Roster Begin Time	10:00 AM		

Attorney Bar Number		Case #		Filed From		Filed Thru		View Notes				
#	Scheduled Date	Start Time	Duration Hrs:Mins	Description	Filing Party	Filed Date	Case / Case Caption	Sub Type	Tax Map	Plaintiff Attorney	Defendant Attorney	Notes
1	08/25/2025	10:00 AM	0:30	Master/Quiet Title Hearing-August 25 at 10:00	Torrika Devine-PLT	07/18/2025	2024CP1005369 Torrika Devine VS Deann Smith , defendant, et al	Partition 440		Karen Marie DeJong (843) 216-6161	Kelley Yarborough Woody (803) 787-9678	
2	08/25/2025	10:30 AM	1:0	Master/Contested Foreclosure Hearing-Aug. 25 at 10:30	Waterford Horizontal Property Regime Inc Of Charleston-PLT	07/18/2025	2024CP1003745 Waterford Horizontal Property Regime Inc Of Charleston VS Leroy Patton , defendant, et al	Real Prop/Other 499	5350000185	John Joseph Dadds III (843) 881-6530	Matthew M. Billingsley (843) 266-2174 Audrey Maple Snipes	
3	08/25/2025	11:30 AM	1:0	Master/Contested Foreclosure Hearing-Aug. 25 at 11:30	Parkdale Villas Horizontal Property Regime-PLT	07/18/2025	2024CP1004228 Parkdale Villas Horizontal Property Regime VS James L Daniel	Foreclosure 420	3101100056	Dylan Ross Glick (803) 724-1821	Robert Alan Bernstein (843) 529-1111	
4	08/25/2025	2:00 PM	1:0	Master/Partition Hearing-Aug. 25 at 2:00	Danielle C Brown-PLT	07/18/2025	2023CP1005212 Danielle C Brown VS Crystal Brown Nwaneri	Partition 440	9850600026	Logan Steels Davis (843) 860-8969 Stephen Tyler Graves (843) 727-5741		
5	08/25/2025	3:00 PM	1:0	Master/Valuation Hearing-Aug. 25 at 3:00	Cassandra Infinger-PLT	07/18/2025	2024CP1004112 Cassandra Infinger , plaintiff, et al VS Everett Brockington	Partition 440	4640100018 4640100084	Christopher Lanning (843) 766-5576	Everett Brockington	

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UNITED STATES US

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ACTWGT: 0.20LB
CAD: 256649294/NET4870
BILL SENDER

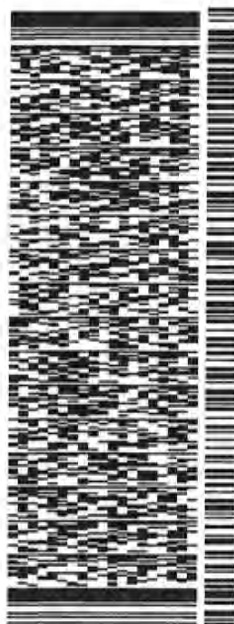
TO CRYSTAL BROWN NWANERI

17293 OAKWOOD LODGE LANE

PINEY POINT MD 20674

(843) 805-4649
REF
PO

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** 2DAY **

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GRAVES & DAVIS
Attorneys at Law

1730 Central Park Road
Charleston, SC 29412
P: (843) 805-4649
F: (843) 620-1047

August 12, 2025

SENT VIA FEDEX

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
Piney Point, MD 20674

Re: Danielle C. Brown v. Crystal Brown Nwaneri
Case No.: 2023-CP-10-06212, Master-in-Equity Court for Charleston County, South Carolina

Dear Ms. Nwaneri:

Pursuant to the South Carolina Rules of Civil Procedure, enclosed please find a Notice of Hearing in the above-referenced matter.

If you have any questions about your legal rights or obligations, you may wish to consult with an attorney.

Sincerely,

Logan S. Davis, Esq.
Graves & Davis, LLC
1730 Central Park Road
Charleston, SC 29412
Phone: (843) 805-4649
Fax: (843) 620-1047
Ldavis@gravesdavis.com

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023CP1006212

NOTICE OF HEARING

TO: DEFENDANT CRYSTAL BROWN NWANERI

YOU WILL PLEASE TAKE NOTICE that a partition hearing in this matter will be held on August 25, 2025 at 2:00 PM before the Honorable Mikell R. Scarborough, Master-In-Equity/Special Referee for Charleston County, at the Charleston County Judicial Center, 100 Broad Street, Suite 266, Charleston, SC 29401.

Respectfully submitted,

GRAVES & DAVIS, LLC



Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047

tgraves@gravesdavis.com

ldavis@gravesdavis.com

Attorneys for Plaintiff

August 12, 2025
Charleston, South Carolina

8/12/25, 9:06 AM

Court Roster Details



Charleston County

Court Rosters

Pending Cases Search Clerk of Court Home Return To Roster Selection Jury & Non Jury Trial Roster Clerk of Court Chat

Court Agency	10003	Judge	Scarborough	Roster Description	Master in Equity Docket for Monday, August 25, 2025
Roster Type	Master's Hearings	Roster Begin Date	08/25/2025	Roster End Date	08/25/2025
Roster Id	2553	Roster Begin Time	10:00 AM		

Attorney Bar Number

Case #

Filed From

Filed Thru

Sub Type

Tax Map

Plaintiff Attorney

Defendant Attorney

Notes

#	Scheduled Date	Start Time	Duration Hrs:Mins	Description	Filing Party	Filed Date	Case / Case Caption	Sub Type	Tax Map	Plaintiff Attorney	Defendant Attorney	Notes
1	08/25/2025	10:00 AM	0:30	Master/Quiet Title Hearing-August 25 at 10:00	Torrika Devine-PLT	07/18/2025	2024CP1005369 Torrika Devine VS Deann Smith , defendant, et al	Partition 440		Karen Marie DeJong (843) 216-6161	Kelley Yarborough Woody (803) 787-9678	
2	08/25/2025	10:30 AM	1:0	Master/Contested Foreclosure Hearing-Aug. 25 at 10:30	Waterford Horizontal Property Regime Inc Of Charleston-PLT	07/18/2025	2024CP1003745 Waterford Horizontal Property Regime Inc Of Charleston VS Leroy Patton , defendant, et al	Real Prop/Other 499	5350000185	John Joseph Dodds III (843) 881-6530	Matthew M. Billingsley (843) 266-2174 Audrey Maple Snipes	
3	08/25/2025	11:30 AM	1:0	Master/Contested Foreclosure Hearing-Aug. 25 at 11:30	Parkdale Villas Horizontal Property Regime-PLT	07/18/2025	2024CP1004228 Parkdale Villas Horizontal Property Regime VS James L Daniel	Foreclosure 420	3101100056	Dylan Ross Glick (803) 724-1821	Robert Alan Bernstein (843) 529-1111	
4	08/25/2025	2:00 PM	1:0	Master/Partition Hearing-Aug. 25 at 2:00	Danielle C Brown-PLT	07/18/2025	2023CP1006242 Danielle C Brown VS Crystal Brown Nwaneri	Partition 440	9850600026	Logan Steele Davis (843) 860-8969 Stephen Tyler Graves (843) 727-5741		
5	08/25/2025	3:00 PM	1:0	Master/Valuation Hearing-Aug. 25 at 3:00	Cassandra Infinger-PLT	07/18/2025	2024CP1004112 Cassandra Infinger , plaintiff, et al VS Everett Brockington	Partition 440	4640100018 4640100084	Christopher Lanning (843) 766-5576	Everett Brockington	

CHSWeb 6.2 to 2023 South Carolina Judicial Department * All rights reserved

EXHIBIT H
Successful FedEx Delivery – Signature Not Required
(Notice of August 25, 2025 Hearing)



August 21, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 883502622602

Delivery Information:

Status:	Delivered	Delivered To:	Residence
Signed for by:	Signature not required	Delivery Location:	17293 OAKWOOD LODGE LN
Service type:	FedEx 2Day		
Special Handling:	Deliver Weekday; Residential Delivery		PINEY POINT, MD, 20674
		Delivery date:	Aug 15, 2025 16:44

Shipping Information:

Tracking number:	883502622602	Ship Date:	Aug 13, 2025
		Weight:	0.5 LB/0.23 KG

Recipient: Crystal Brown Nwaneri, 17293 Oakwood Lodge Lane PINEY POINT, MD, US, 20674	Shipper: Graves Davis LLC, 1730 Central Park Road Charleston, SC, US, 29412
---	---

Proof-of-delivery details appear below; however, no signature is available for this FedEx Express shipment because a signature was not required.

Thank you for choosing FedEx

EXHIBIT I
Successful FedEx Delivery – Signature Required
(Notice of August 25, 2025 Hearing)



August 21, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 883502697920

Delivery Information:

Status:	Delivered	Delivered To:	Residence
Signed for by:	C.Brownwarnei	Delivery Location:	17293 OAKWOOD LODGE LN
Service type:	FedEx 2Day		
Special Handling:	Deliver Weekday; Residential Delivery; Adult Signature Required		PINEY POINT, MD, 20674
		Delivery date:	Aug 15, 2025 16:45

Shipping Information:

Tracking number:	883502697920	Ship Date:	Aug 13, 2025
		Weight:	0.5 LB/0.23 KG

Recipient:	Shipper:
Crystal Brown Nwaneri, 17293 Oakwood Lodge Lane PINEY POINT, MD, US, 20674	Graves Davis LLC, 1730 Central Park Road Charleston, SC, US, 29412

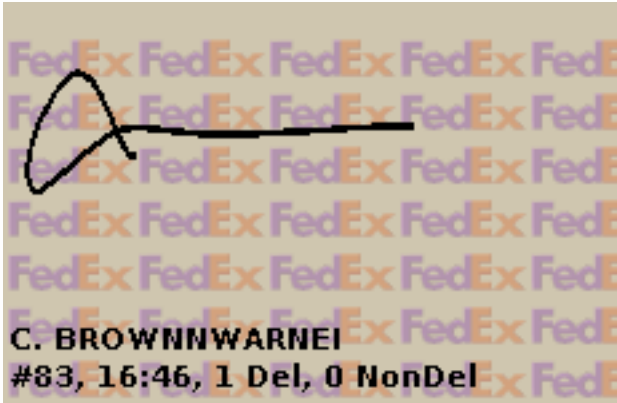


EXHIBIT J
Additional Notice Provided by Email

Subject: Notice of Hearing on 8/25/2025
Date: Tuesday, August 12, 2025 at 9:37:39 AM Eastern Daylight Time
From: Lindsay Barton
To: crystal.brown@gmail.com
CC: Logan Davis, Tyler Graves
Attachments: doc00852720250812082456.pdf, doc00852620250812082442.pdf

Good morning,

Please find attached hereto a Notice of Hearing, which is also being sent to you via FedEx today for service.

Please ensure you receive and review all documentation carefully. If you have any questions regarding the hearing procedures or requirements, please consult with legal counsel or contact the court clerk's office.

Your timely appearance at the scheduled hearing is required.

Respectfully,

Lindsay E. Barton, Esq.
Attorney at Law
Graves & Davis, LLC
1730 Central Park Road
Charleston, SC 29412
Main Phone: (843) 805-4649
Fax: (843) 620-1047
www.gravesdavis.com

EXHIBIT K
Phase II Lawn Care Receipts



phaseilawncare@gmail.com

**Results****Phase II Enterprises...****-\$150**

Sep 19

Money sent

**Phase II Enterprises...****-\$75**

Sep 10

Money sent

**Phase II Enterprises...****-\$75**

Aug 10

Money sent

**Phase II Enterprises...****-\$150**

Jul 27

Money sent

**Phase II Enterprises...****-\$150**

Jun 14

Money sent

**Phase II Enterprises...****-\$150**

May 9

Money sent

**Phase II Enterprises...****-\$150**

Apr 11

Money sent

**Phase II Enterprises...****-\$190**

Mar 9

Money sent



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$190**

Mar 9

Money sent

**Phase II Enterprises...****-\$190**

Feb 23

Money sent

**Phase II Enterprises...****-\$75**

Feb 13

Money sent

**Phase II Enterprises...****-\$75**

Dec 29

Money sent

**Phase II Enterprises...****-\$50**

Dec 21

Money sent

**Phase II Enterprises...****-\$300**

Dec 19

Money sent

**Phase II Enterprises...****-\$150**

Dec 4

Money sent

**Phase II Enterprises...****-\$150**

Nov 7

Money sent

**Phase II Enterprises...****-\$150**



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$150**

Sep 11

Money sent

**Phase II Enterprises...****-\$75**

Aug 14

Money sent

**Phase II Enterprises...****-\$150**

Jul 17

Money sent

**Phase II Enterprises...****-\$150**

Jul 10

Money sent

**Phase II Enterprises...****-\$75**

Jun 16

Money sent

**Phase II Enterprises...****-\$75**

May 17

Money sent

**Phase II Enterprises...****-\$75**

Apr 27

Money sent

**Phase II Enterprises...****-\$500**

Mar 31

Money sent

**Phase II Enterprises...****-\$75**



phaseilawncare@gmail.com



- | | | |
|---|--|---------------|
|  | Phase II Enterprises...
Mar 20
Money sent | -\$75 |
|  | Phase II Enterprises...
Mar 2
Money sent | -\$75 |
|  | Phase II Enterprises...
Feb 6
Money sent | -\$500 |
|  | Phase II Enterprises...
Jan 1
Money sent | -\$500 |
|  | Phase II Enterprises...
Nov 28
Money sent | -\$75 |
|  | Phase II Enterprises...
Nov 1
Money sent | -\$75 |
|  | Phase II Enterprises...
Nov 1
Money sent | -\$75 |
|  | Phase II Enterprises...
Oct 5
Money sent | -\$200 |
|  | Phase II Enterprises... | -\$150 |



phaseilawncare@gmail.com



- | | | |
|---|---|---------------|
|  | Phase II Enterprises...
Aug 30
Money sent | -\$150 |
|  | Phase II Enterprises...
Aug 12
Money sent | -\$75 |
|  | Phase II Enterprises...
Jul 25
Money sent | -\$150 |
|  | Phase II Enterprises...
Jul 5
Money sent | -\$100 |
|  | Phase II Enterprises...
Jun 16
Money sent
"Lawn services" | -\$150 |
|  | Phase II Enterprises...
May 28
Money sent | -\$150 |
|  | Phase II Enterprises...
May 2
Money sent | -\$75 |
|  | Phase II Enterprises...
Apr 12
Money sent | -\$150 |



phaseilawncare@gmail.com

**Phase II Enterprises...****-\$150**

Jul 25

Money sent

**Phase II Enterprises...****-\$100**

Jul 5

Money sent

**Phase II Enterprises...****-\$150**

Jun 16

Money sent

"Lawn services"

**Phase II Enterprises...****-\$150**

May 28

Money sent

**Phase II Enterprises...****-\$75**

May 2

Money sent

**Phase II Enterprises...****-\$150**

Apr 12

Money sent

**Phase II Enterprises...****-\$425**

Mar 18

Money sent

EXHIBIT L
Affidavit of Attorneys' Fees

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,
Plaintiff,

v.

CRYSTAL BROWN NWANERI,
Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

AFFIDAVIT OF ATTORNEY'S FEES

PERSONALLY appeared before me the undersigned attorney, Logan S. Davis, being duly sworn, deposes, and says:

1. I am over the age of eighteen (18) and am testifying as to this information upon my personal knowledge, information, and belief.

2. I am an attorney licensed in the State of South Carolina with the law firm, Graves & Davis, LLC, located at 1730 Central Park Road, Charleston, South Carolina 29412.

3. Graves & Davis, LLC is responsible for the representation of Ms. Danielle C. Brown ("Plaintiff").

4. The above-captioned case is an action in which the Plaintiff is entitled to recover attorneys' fees.

5. As counsel for the Plaintiff in this action, I am familiar with the type of legal fees that are generally awarded.

6. Counsel's fee agreement with Plaintiff is based upon billable hours, pursuant to an engagement letter between Graves & Davis, LLC and Plaintiff.

7. Since the commencement of the engagement agreement on or about December 13, 2023, through the date of this Affidavit, Plaintiff has accumulated a total of \$5,950.00, in attorneys' fees and \$881.02 in other legal costs relating to this matter.

8. Tasks performed to date in connection with this matter include: review of probate and property records relevant to this claim; research as to the whereabouts of the defendant; preparation, filing and service of pleadings, including service by publication; preparation and filing of motion for default; preparation and filing of proposed order of reference, preparation and delivery of notice of hearing; preparation of memorandum in support of partition and exhibits thereto; preparation of amended memorandum in support of partition and exhibits thereto; and other general communications and preparation.

9. Counsel respectfully requests that the Court take notice of additional time and fees that will accrue between the date of this Affidavit and the hearing scheduled for August 25, 2025, and that counsel respectfully notifies the Court that it anticipates presenting a supplementary attorneys' fees affidavit at the hearing.

10. Further, counsel respectfully notifies the Court that additional time and fees will be needed to provide legal guidance to Plaintiff with respect to the sale that will occur following an order of partition and, thus, counsel respectfully notifies the Court that it anticipates future work will be required on this matter so counsel may request additional fees during the post-judgment process.

11. The attorneys' fees and other legal costs requested herein are appropriate under the factors set forth by the South Carolina Supreme Court in *Jackson v. Speed*: (1) the nature, extent, and difficulty of the case; (2) the time necessarily devoted to the case; (3) professional standing of counsel; (4) contingency of compensation; (5) beneficial results obtained; and (6) customary legal

fees for similar services. See *Jackson v. Speed*, 326 S.C. 289, 308, 486 S.E.2d 750,760 (1997).

12. This affidavit is being submitted in support of Plaintiff's request for attorneys' fees and other legal costs in accordance with Rule 55(b)(3) of the South Carolina Rules of Civil Procedure.

13. On behalf of the Plaintiff, I request an award for all attorneys' fees and other legal costs to date in addition to the further attorneys' fees and other legal costs anticipated to be performed until final adjudication of this matter (as noted above).

FURTHER AFFIANT SAYETH NOT.


Logan S. Davis, Esq. (S.C. Bar # 104429)
1730 Central Park Road
Charleston, South Carolina 29412
P: 843-805-4649 / F: 843-620-1047
ldavis@gravesdavis.com

SWORN TO AND SUBSCRIBED
Before me this 21st day of August, 2025.


NOTARY PUBLIC FOR SOUTH CAROLINA

Printed Name: Rachel A. Meyer

My commission expires: 01-27-2031



Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 08-21-2025 02:46:49 PM.

Logan Davis - Notification transmitted on 08-21-2025 02:46:48 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 08-21-2025 02:46:35 PM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Document(s) Submitted: Memo/Memo in Support

- Exhibit/Filing of Exhibits

Filed by or on behalf of: Logan Steele Davis

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
(Master-in-Equity Division – Charleston County)

Danielle C. Brown, Plaintiff,

v.

Crystal Brown Nwaneri, Defendant.

Civil Action No.: 2023-CP-10-06212

DEFENDANT’S OBJECTION TO SHORT NOTICE OF HEARING AND LATE-FILED “AMENDED MEMORANDUM OF LAW”

Defendant, Crystal Brown Nwaneri, pro se, respectfully objects to the hearing presently scheduled for August 25, 2025, at 2:00 p.m. before the Master-in-Equity, and Plaintiff’s last-minute “Amended Memorandum in Support of Partition by Sale,” electronically filed on August 21, 2025, as untimely and untrue, among other things.

I. Plaintiff Failed to Provide Adequate Notice of Hearing Under Rule 6

1. Rule 6(d), SCRPC, requires at least ten (10) days’ notice of a hearing.
2. Rule 6(e), SCRPC, provides that when service is made by mail, three (3) additional days shall be added to the prescribed period. Courts have applied this rule strictly. *Miller v. Miller*, 375 S.C. 443, 652 S.E.2d 754 (Ct. App. 2007).
3. Thus, for a hearing on August 25, 2025, notice had to be served no later than August 12, 2025, so that Defendant received it by August 14, 2025 at the latest.
4. Instead:
 - Plaintiff’s counsel did not give the FedEx package containing the Notice of Hearing to FedEx until August 13, 2025—already one day after the deadline for mailing under Rule 6(e).
 - FedEx did not attempt delivery until August 15, 2025, when Defendant immediately signed for the package. A duplicative package without signature requirement was also left the same day. See Exhibit A (tracking receipts for FedEx packages 883502622602 and 883502697920, both sent by “FedEx 2day”

on Aug. 13, 2025 and delivered to Defendant’s residence in Maryland on Aug. 15, 2025—FedEx’s first delivery attempt).

5. By **opposing counsel’s own choice to delay mailing and to use two-day FedEx service** rather than overnight, the Notice was not received until five business days before the hearing, far short of the 13 days required under Rule 6(c) and (e).
-

II. Substantial Prejudice to Defendant

6. The late notice severely prejudices Defendant. Defendant resides in Maryland, hundreds of miles away, and is the primary caregiver of three young children in elementary school. With the school year just beginning, arranging travel, childcare, and adequate preparation on five business days’ notice is impossible without significant prejudice.
 7. The notice defect is not merely technical. It deprived Defendant of the very opportunity Rule 6 is designed to guarantee: a meaningful chance to prepare and be heard.
-

III. Plaintiff’s August 20 “Confirmation Email” Does Not Cure the Deficient Notice

8. On August 20, 2025—five days after the late FedEx package—Plaintiff’s counsel emailed Defendant and copied the Master-in-Equity’s law clerk to “confirm” the hearing date.
 9. This does not cure the Rule 6 violation:
 - Service by email is not authorized under Rule 5, SCRCP, absent consent, which Defendant has not given.
 - The email was sent five days later than even the already deficient FedEx notice, and appears to be a post hoc attempt to paper over known defects.
-

IV. Plaintiff’s August 21 Amended Memorandum Is Untimely and Prejudicial

10. Plaintiff electronically filed an “Amended Memorandum in Support of Partition by Sale” on August 21, 2025, only four days before the hearing.

This filing is improper and prejudicial, as it was filed so close to the hearing that Defendant cannot meaningfully review or respond in time for the hearing.

11. Among other untruths and mischaracterizations, Plaintiff’s memorandum attempts to reshape the record and portray Defendant as “in default” or “uncooperative” despite her active participation and objections. It contains false and misleading statements, consistent with Plaintiff’s pattern of misrepresentations to the Court—for example, that Defendant “refused delivery” of prior notices, when in fact FedEx records show

Defendant immediately accepted and signed for the package at first attempt on August 15. See Ex. A.

The memorandum is plainly a last-minute attempt to bolster Plaintiff's position after the obvious violation of Rule 6.

V. Relief Requested

For the foregoing reasons, Defendant respectfully requests that the Court:

1. Sustain Defendant's objection and find that Plaintiff failed to comply with Rule 6, SCRCF;
 2. Continue or strike the hearing scheduled for August 25, 2025, and reset it only upon proper notice in full compliance with the Rules of Civil Procedure; and
 3. Grant such other and further relief as the Court deems just and proper.
-

Dated: August 21, 2025

Respectfully submitted,



Crystal Brown Nwaneri, Pro Se
17293 Oakwood Lodge Lane
Piney Point, MD 20674
(917) 651-8546

DELIVERED

Friday

8/15/25 at 4:45 PM

Signed for by: C.Brownwarnei

[↓ Obtain proof of delivery](#)

DELIVERY STATUS

Delivered 

[📄 Report missing package](#)

ADD YOUR EMAIL TO STAY UPDATED ON THIS SHIPMENT

GET UPDATES

MORE OPTIONS

TRACKING ID

883502697920 [✎](#) [☆](#)

FROM

Charleston, SC US

Label Created

8/12/25 8:20 AM

WE HAVE YOUR PACKAGE

LADSON, SC

8/13/25 5:57 PM

ON THE WAY

WALDORF, MD

8/15/25 8:41 AM

OUT FOR DELIVERY

WALDORF, MD

8/15/25 8:47 AM

DELIVERED

PINEY POINT, MD US

Delivered

Shipment facts



Shipment overview

TRACKING NUMBER	883502697920
DELIVERED TO	Residence
SHIP DATE ?	8/13/25
STANDARD TRANSIT ?	8/15/25 before 8:00 PM
DELIVERED	8/15/25 at 4:45 PM



Services

SERVICE	FedEx 2Day
TERMS	Shipper
SPECIAL HANDLING SECTION	Deliver Weekday, Residential Delivery, Adult Signature Required
SIGNATURE SERVICES ?	Adult Signature Required



Package details

WEIGHT	0.5 lbs / 0.23 kgs
TOTAL PIECES	1
TOTAL SHIPMENT WEIGHT	0.5 lbs / 0.23 kgs
PACKAGING	FedEx Envelope

[↑ Back to top](#)

Travel history

SORT BY DATE/TIME

Time zone

Ascending



Local Scan Time



Tuesday, 8/12/25

8:20 AM

• Shipment information sent to FedEx

Wednesday, 8/13/25	5:57 PM	• Shipment arriving On-Time	LADSON, SC
	5:57 PM	• Picked up	LADSON, SC
	9:28 PM	• Left FedEx origin facility	LADSON, SC
Thursday, 8/14/25	7:01 AM	• Arrived at FedEx hub	MEMPHIS, TN
	3:56 PM	• On the way	MEMPHIS, TN
Friday, 8/15/25	2:57 AM	• Departed FedEx hub	MEMPHIS, TN
	8:41 AM	• At local FedEx facility	WALDORF, MD
	8:47 AM	• On FedEx vehicle for delivery	WALDORF, MD
	4:45 PM	✓ Delivered	PINEY POINT, MD

[↑ Back to top](#)

DELIVERED

Friday

8/15/25 at 4:44 PM

Signed for by: Signature not required

[↓ Obtain proof of delivery](#)

DELIVERY STATUS

Delivered 



[🔍 Report missing package](#)

ADD YOUR EMAIL TO STAY UPDATED ON THIS SHIPMENT

GET UPDATES

MORE OPTIONS

TRACKING ID

883502622602 [✎](#) [★](#)

FROM

Charleston, SC US

Label Created

8/12/25 8:18 AM

WE HAVE YOUR PACKAGE

LADSON, SC

8/13/25 5:57 PM

ON THE WAY

WALDORF, MD

8/15/25 8:41 AM

OUT FOR DELIVERY

WALDORF, MD
8/15/25 8:47 AM

DELIVERED
PINEY POINT, MD US

Delivered
8/15/25 at 4:44 PM

↓ [View travel history](#)

Shipment facts

 Shipment overview

TRACKING NUMBER	883502622602
DELIVERED TO	Residence
SHIP DATE 	8/13/25
STANDARD TRANSIT 	8/15/25 before 8:00 PM
DELIVERED	8/15/25 at 4:44 PM

 Services

SERVICE	FedEx 2Day
TERMS	Shipper
SPECIAL HANDLING SECTION	Deliver Weekday, Residential Delivery

 Package details

WEIGHT	0.5 lbs / 0.23 kgs
TOTAL PIECES	1
TOTAL SHIPMENT WEIGHT	0.5 lbs / 0.23 kgs
PACKAGING	FedEx Envelope

↑ [Back to top](#)

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON FOR THE NINTH JUDICIAL CIRCUIT
CASE NO. 2023-CP-10-6212

Danielle Brown,

Plaintiff,

vs.

Crystal Brown Nwaneri,

Defendant.

Hearing before the Honorable Mikell R. Scarborough, reported by Josie Allen Boehm, Registered Professional Reporter and Notary Public, at 100 Broad Street, Courtroom 2A, Charleston, South Carolina, August 25th, 2025 commencing at 1:59 p.m.

APPEARANCES

For the Plaintiff:

Logan Steele Davis, Attorney at Law

Graves & Davis, LLC

1730 Central Park Road

Charleston, SC 29412

Office: (843) 805-4649

ldavis@gravesdavis.com

Stephen Tyler Graves, Attorney at Law

tgraves@gravesdavis.com

EXAMINATION INDEX

Brown, Danielle (sworn)

15

1 THE COURT: Y'all are here in the Danielle
2 Brown versus Crystal Brown Nwaneri case, and that's
3 2023-CP-10-6212. Ms. Nwaneri has been very active
4 with her e-mails today and just late last week.
5 However, I did not find where she had ever filed any
6 type of responsive pleading and, in fact, she had been
7 found to be in default; is that correct?

8 MR. DAVIS: That's right, Your Honor.

9 THE COURT: Okay. So she sent something. I
10 think this morning I got greeted by a flurry of
11 e-mails and she wanted to continue this matter.

12 I had already continued it from January as my
13 record reflected. And apparently, based on y'all's
14 presentation, she's done nothing to move the ball
15 forward in the last, I guess, eight months. I think
16 it was late January we were due in here.

17 And so she claims to not -- that the her due
18 process is being violated because she only had 10 days
19 notice to get here, which is certainly sufficient
20 notice to appear. But like I said, she doesn't seem
21 to have done anything.

22 I will let you make a record of your efforts
23 to do that, which I think you have already done. So I
24 told her this morning that we were going forward
25 regardless. And she wanted to appear by phone, and

1 she did that last time, and I don't think that was
2 very productive.

3 So if she can't be here today in person, I'm
4 not going to entertain her by phone. So this is a
5 partition action anyway, correct?

6 MR. DAVIS: Yes, Your Honor.

7 THE COURT: And I assume, Mr. Davis, you're
8 well aware that in a partition action in which the
9 plaintiff seeks to sell the property, the defendant,
10 even if they are in default, they get the right of
11 first refusal?

12 MR. DAVIS: Yes, sir.

13 THE COURT: I agree with you in your
14 pleadings. This is not a Pinckney statute case, but
15 it does fit under the old statute. So 15-61-25 will
16 apply, and we'll apply that today.

17 And I have got a copy of my standing order on
18 all partition actions, and I'm going to give that to
19 you, and we'll include that language when we serve her
20 for the next hearing, which unfortunately we will
21 probably need to have, but let's work through that
22 process today.

23 Okay. So I don't know what she wants to do,
24 because all she wants to do is delay it, and that
25 doesn't get us anywhere. The statute provides her

1 with the right of first refusal. She's supposed to do
2 that 10 days prior to the hearing. I have gotten
3 nothing along those lines, but I don't know to what
4 extent -- if she's only got the notice 10 days at a
5 time then it probably wasn't enough time for her to do
6 that.

7 So what I want to do -- I think that's where
8 this came from. So I'm going to give you a new date,
9 but I do want to -- I will take some testimony from
10 you.

11 Do you have an appraisal of this property in
12 hand or what have you done to value the property?

13 MR. DAVIS: No, Your Honor. What we were
14 going to ask the Court is if it was possible to work
15 through a Carolina One or something of that nature to
16 have a broker in charge appoint somebody in that
17 physical area to come up with their broker price
18 opinion and list the property.

19 But in the event the Court required an
20 appraiser, we were going to ask that Mr. Mark Flower
21 be appointed as the Court deems it necessary.

22 THE COURT: Okay. Have y'all gotten anywhere
23 with your -- she's your sister, correct?

24 MS. BROWN: Yes, sir.

25 THE COURT: Have you communicated at all?

1 MS. BROWN: No, sir.

2 THE COURT: I have seen the history of the
3 thing, and it's just not going anywhere slow is what I
4 see happening.

5 And so this is an unfortunately --

6 MR. DAVIS: And, Your Honor, we were trying
7 to -- the last hearing, we had not heard any response
8 from her. She didn't file anything, and we actually
9 heard from her the morning of the hearing that day, I
10 believe it was, and so we wanted to work with her. We
11 would rather work it out.

12 And what we did is we talked about mediating
13 the case, not that we had to at that point, but we
14 asked her if she would be open to mediating.

15 She said would be up to mediating in the next
16 month or two, and we could never get her to coordinate
17 that, so here we are.

18 THE COURT: So eight months later, no
19 mediation and no offer has been made?

20 MR. DAVIS: No offer has been made.

21 THE COURT: Do you have a feel for what the
22 property is worth or are you relying on the market?

23 MS. BROWN: We're relying on the market
24 because it's just sitting there rotting, you know.

25 THE COURT: What's the condition of the

1 property? Is it falling apart?

2 MS. BROWN: Yes.

3 THE COURT: All right.

4 MS. BROWN: I was told by the landscaper that
5 the roof needed to be repaired like four years ago. I
6 repaired my own roof in Atlanta so I couldn't afford
7 to repair that.

8 So that was sold four years ago. We've been
9 through two storms here.

10 THE COURT: My second bad roof of the day.

11 MS. BROWN: And also you see the brick is
12 coming apart. You can see the insulation on the side,
13 so it needs foundation.

14 MR. DAVIS: And, Your Honor, on that note,
15 the last time we looked at this, this was back in
16 January. And I want to say the value that we came up
17 with from looking at comps on like Zillow and things
18 like that was around 350,000.

19 The market has -- I don't know what the
20 market is doing right now. But the last assessment or
21 notice of reassessment that was received showed that,
22 not counting in the 15 percent cap, the County has it
23 marked at 266,400.

24 So we think that it would likely go somewhere
25 between the 266,400 and 350 and somewhere in there.

1 THE COURT: Yeah. And what's the property
2 address?

3 MR. DAVIS: Property address is 8297 Delhi
4 Road, DELHI, North Charleston, 29496.

5 THE COURT: All right. Yeah, under the
6 Pinckney statute, I pretty much require an appraisal.

7 Here's what we do, and I will be glad to take
8 some testimony from Ms. Brown in a second, but I want
9 to give you some background and let's make a record.
10 I don't know what Ms. Nwaneri is going to do.

11 Under 15-16-25(a), and that's the language of
12 the document I just gave you, I think I actually gave
13 you that in like 2007, and it got amended in '17 with
14 the Pinckney statute.

15 "The Court is to provide the nonpetitioning
16 tenants who are interested in purchasing the property"
17 -- well, I don't even know if she wants to purchase
18 the property. All I know is she's been delaying the
19 process.

20 "To notify the Court of that interest no
21 later than 10 days prior to the date set for the trial
22 of the case."

23 And so I believe that obligates me to set
24 another hearing. Okay? But we're going to work
25 through that.

1 "The nonpetitioning tenants shall be allowed
2 to purchase the interest of the property as provided
3 in the section whether default has been entered
4 against them or not."

5 So that's where default doesn't matter. They
6 still have the right of first refusal. And so I've
7 got to, I think, procedurally provide her with that
8 right.

9 The statute then goes on in section B, "In
10 the circumstances described above, in the event the
11 parties cannot reach an agreement" -- well, that's
12 what I don't know, because I don't have any agreement
13 whatsoever -- "as to price, the value shall be
14 determined by one or more competent real estate
15 appraisers as the court shall approve appointed for
16 that purpose."

17 Okay. So the cost of the appraisers is to be
18 taxed as part of the cost of the court, and we go from
19 there. In the event the petitioning tenants -- that's
20 the plaintiffs -- object to the value as determined by
21 the appraisers, then y'all can go out and get another
22 one, which is one of the reasons why I think it's in
23 your best interest probably to get an appraisal. I
24 know it costs money, and/or you can try and get the
25 property under -- you know, get a realtor involved.

1 But I've got to give the defendant, even
2 though she's in default, the right of first refusal
3 because she has to exercise that right 10 days prior
4 to the hearing, and then she's got 45 days in which to
5 comply.

6 And so what I would like to do is get this
7 case set up such that I give y'all time to either get
8 an appraisal or some sort of value so that when she
9 makes that offer -- and that sounds reasonable to me,
10 somewhere between 265 and 365 sounds like a reasonable
11 price for the property even in its condition.

12 But I don't know what the condition is
13 because I haven't seen it, but that's what an
14 appraisal will also tell me. Okay?

15 BPO, a broker's opinion of value, and they
16 have some interest in what the market is going to
17 bear, but there's a lot of self-dealing that goes on
18 in that realm, too, so that's what gives me some
19 concern.

20 So what I am looking to do is I'm going to
21 put the ball back in your court because you are the
22 moving party, but I got to give Ms. Nwaneri her due
23 process. She's entitled to her due process, which she
24 is demanding, but I will make a specific finding of
25 fact that because she was served 10 days prior to the

1 hearing, she's had sufficient process, not
2 withstanding the fact that we agreed to continue this
3 case once before, and I generally give a party a
4 one-time continuance.

5 She's had her one continuance, and that
6 turned in to an eight-month delay, so we need to move
7 the ball forward.

8 So based upon that, I have asked my staff to
9 find a court date that's 60 days out because it
10 sometimes takes that long to get an appraisal in hand
11 if you haven't already gotten one.

12 And then provided that it's sufficient time
13 that if she does, in fact, act, she would have 45
14 days, and I would want that done by the end of the
15 year.

16 So the date they've given me, check your
17 calendar, but November 3 at 11 a.m. is the date.

18 MR. DAVIS: Your Honor, I'll actually be
19 potentially in an arbitration in Oregon that day.

20 THE COURT: That's a Monday, November 3.

21 MR. DAVIS: Yes, Your Honor.

22 THE COURT: All right. Under the old
23 statute, you're not as limited with what you are with
24 the Pinckney statute.

25 Go back to the following week.

1 MR. DAVIS: Your Honor, we can probably get
2 an appraisal in the next two weeks.

3 THE COURT: Have y'all talked to Walt Flowers
4 about this?

5 MR. DAVIS: I haven't talked to Walt a while,
6 back in January. But we might end up using --

7 MR. GRAVES: We have another appraiser. We
8 have a whole real estate transaction department at our
9 office, and we have access to some other appraisers.

10 And we have one that is typically -- if we
11 ask a favor, can help us out. And I was just
12 mentioning to Logan, we have another hearing with you
13 on the 17th of October. I don't know if that would
14 make sense.

15 THE COURT: That's a supplemental proceeding?

16 MR. GRAVES: Yes, Your Honor.

17 THE COURT: I don't like to mix those two.

18 I've got October 20th is a Monday, and I
19 think October the 6th, I could get you in that day as
20 well.

21 MR. DAVIS: October 6th. Let's see. That's
22 sooner.

23 THE COURT: I mean, that's six weeks as
24 opposed to 60 days. And if we set that one, then she
25 would need to be noticed.

1 MR. DAVIS: Let's go with the 6th, then.

2 THE COURT: Okay. Let's move it to 1:00 on
3 Monday, October 6th, okay.

4 And so here's what I need you to do. I'm
5 going to take some testimony from Ms. Brown now so she
6 can give the background for what's going on here, and
7 then I'm going to need you to send me an order.

8 And in that order, I'm going to include the
9 language in that standing order. You're going to
10 attach that language in that standing order to my
11 order, and it's going to provide that Ms. Nwaneri has
12 10 days prior to that -- let's count those days off.
13 We'll get a notice out this week. 26th.

14 So by Friday, September 26th, she's going to
15 notify us of her desire to purchase the property and,
16 if so, for how much. Okay. And then when we come
17 back here on the 6th, if she's met your number, she's
18 going to get 45 days. And if she hasn't met your
19 number, you're going to say this is what I want. So
20 we'll set it for October 6 at 1:00 p.m.

21 All right. Mr. Davis, anything further?

22 MR. DAVIS: Is there any guidance from the
23 Court on us providing her a copy of the appraisal,
24 some timely --

25 THE COURT: If you get it in hand and you've

1 got it, under the new statute, you got to. Okay?
2 Under the old statute, doesn't say that.

3 What was the language they used? "In the
4 event the parties cannot reach an agreement as to
5 price." Okay? And if you say this is your price,
6 that's what it's going to be.

7 And then if she doesn't do that, we're going
8 to put it on the market and see what the market bears.

9 All right. You want to call Ms. Brown and
10 let her tell me about how much fun she's been having?

11 MR. GRAVES: Judge, just to clarify, on the
12 appraisal, she has 10 days, so the 26th before the
13 October 6th hearing.

14 If we get her the appraisal by the 26th, is
15 that appropriate or do we need to get her -- like
16 we're going to try and do it as quick as we can.

17 I just worry that we start running up on
18 dates, is she going to start sending more e-mails
19 saying I didn't net enough notice.

20 THE COURT: Of course she is. And I don't
21 think you're required to provide them with the
22 appraisal. I'm asking you to have that in here
23 because if she comes in and says, well, I'll buy you
24 out for the price of \$200,000 and y'all say, hey, we
25 think it's worth 300,000 and here is our appraisal

1 that says that, then I know you don't have an
2 agreement on price.

3 MR. GRAVES: Got it. Thank you.

4 THE COURT: And then she's racking up these
5 extra expenses that y'all are asking her to pay. She
6 needs to understand that.

7 DANIELLE BROWN, having been duly sworn to
8 tell the truth, the whole truth, and nothing but the
9 truth, was examined and testified as follows:

10 THE COURT: All right. Give me your full
11 name and address, please.

12 WITNESS: Danielle Celeste Brown. My address
13 is 106 Kenninghall Drive, and that's in Smyrna,
14 Georgia.

15 THE COURT: Ms. Brown, give me a little
16 background. Tell me about your sister.

17 And I understand this is an estate case. Did
18 you run the estate as well?

19 WITNESS: Yes, sir. So my dad died in 2018,
20 April, without a will. And the law in South Carolina
21 requires however many heirs you have to agree who's
22 going to be the personal representative.

23 I could never get Crystal to agree. I had to
24 sue her. I had to take her to court to get the
25 probate started.

1 And she's been upset ever since, and this is
2 her way of trying to -- I don't even know what she
3 wants to do with the house.

4 It's her way of trying to do whatever the
5 opposite of what I want.

6 THE COURT: Did y'all have problems before
7 your father died?

8 WITNESS: Well, my mom had cancer, and my mom
9 died 2014. So we had a little hiccup then because I
10 felt like she wasn't coming down enough to help me
11 with my mom, but we got over that.

12 My mom died in 2014. And my dad -- we were
13 okay until my dad died. Even after he died, we were
14 okay.

15 But he died in April, and I was trying to
16 wait for her to clean up the house and get this thing
17 started.

18 And come November, 2018, I clean up the
19 house. She didn't like that. And I had to sue her to
20 start the probate, so we haven't spoken since.

21 THE COURT: Y'all have not spoken at all?

22 WITNESS: Not at all. We have a cousin group
23 text, and she says pretty much mean things about me on
24 there, but not directly. No communication.

25 THE COURT: Well, I am familiar with family.

1 I got it myself.

2 WITNESS: Exactly.

3 THE COURT: Okay. So you're not expecting
4 any type of agreement whatsoever; is what I hear you
5 saying?

6 WITNESS: No.

7 THE COURT: And have not had any help since
8 your dad died in 2018?

9 WITNESS: No, sir.

10 THE COURT: And you did a deed of
11 distribution, and y'all each got a half interest; is
12 that right?

13 WITNESS: Yes, sir.

14 THE COURT: And that was in '22?

15 WITNESS: Yes. That's how long it took. And
16 there's another property in Mount Pleasant that we're
17 trying to -- I have a quiet title going on with that.
18 Because we couldn't find the deed to it, so we had to
19 get somebody to do the work on that. And she's also
20 contesting that.

21 THE COURT: Okay. That's a separate case?

22 WITNESS: Yes, sir.

23 THE COURT: Okay. This is 23-6212, and
24 you've got 23-4783.

25 And that property is in Mount Pleasant, you

1 said?

2 WITNESS: Yes, sir.

3 THE COURT: All right. Your father was
4 George Lee Brown, right?

5 WITNESS: Yes, sir.

6 THE COURT: This property is North
7 Charleston, right?

8 MS. BROWN: Yes, sir. This property is our
9 childhood home.

10 THE COURT: Where y'all grew up?

11 WITNESS: Yes, sir.

12 THE COURT: Your sister older or younger?

13 WITNESS: She's younger. Six years.

14 THE COURT: Okay. All right.

15 What is it that you want out of this
16 arrangement? You want the property sold, proceeds
17 divided in half? Is that ultimately what you're
18 seeking?

19 WITNESS: Yes, sir.

20 THE COURT: You would be happy to buy her out
21 if she was willing to pay the fair market value for
22 it?

23 WITNESS: Yes, sir.

24 THE COURT: All right. Very good. And
25 sitting here today, do you have an opinion as to what

1 you believe the value of the property to be?

2 WITNESS: No. I wish I could. I have no
3 idea.

4 I did a few years ago, but I can agree with
5 what someone here said.

6 THE COURT: Somewhere between 265 and 365?

7 WITNESS: Yes.

8 THE COURT: Okay. And in the meanwhile, the
9 property -- who is maintaining the property? Who is
10 paying the taxes and all of that?

11 WITNESS: We're paying it year by year. And
12 it's my year to pay, so I'm going -- I have to pay it.

13 THE COURT: Okay. So y'all do have an
14 arrangement there?

15 WITNESS: Yes, sir. There was one year --
16 because we have tax on both properties. One year that
17 she didn't pay one of the properties, but we've been
18 doing it year by year. Every other year.

19 THE COURT: All right. There was something
20 else in here that I had a question on.

21 You had some expenses in here. Y'all had
22 expenses on lawn maintenance. That's right. Lawn
23 maintenance like 6,000 bucks? This is North
24 Charleston?

25 WITNESS: Yes.

1 THE COURT: You don't cut the grass, the City
2 will cut it for you and charge you a bunch of money.

3 WITNESS: Yes.

4 THE COURT: Okay. And then, of course, you
5 got attorneys' fees, which she's not having.

6 Typically, you know, both sides do that. But
7 if y'all could reach an agreement then you wouldn't
8 have to go through that trouble.

9 But you've got that on two properties?

10 WITNESS: Yes, sir.

11 THE COURT: Okay. All right. And I got
12 handed a note just as we were getting started. We
13 need to correct the TMS number on this property.

14 The lis pendens had something wrong, but
15 check on that. Clerk says it's 4850600026. Says 985.
16 Nine will be up in North Charleston. That's just a
17 typo.

18 There's a house there, right?

19 WITNESS: There is a house there, yes, sir.

20 THE COURT: Okay. Just not in good shape?
21 Okay.

22 Your friends at Zillow think it's worth a
23 little less than 300,000. Okay. But they assume it's
24 not leaking.

25 Okay. Very good. Thank you for coming today

1 and thank you for pushing the ball, and I'm sorry to
2 have to push it back another time.

3 WITNESS: Thank you for going ahead with the
4 hearing. This is the second time I've come up here,
5 so I was hoping that something could be resolved.

6 THE COURT: Well, probably is a little
7 victory if you don't have to come to court. That's
8 why -- in case something happens, I already got your
9 testimony.

10 All right. You can step down. Any questions
11 for her that I didn't ask?

12 MR. DAVIS: I don't think so, Your Honor, and
13 I think you just answered a question I was going to
14 ask you. I appreciate that.

15 THE COURT: Very good. All right. Very
16 good.

17 So I just wanted that background for the
18 record, and I'm sorry you're having to go through
19 this. Not too unusual with families.

20 WITNESS: Yes. I've heard.

21 THE COURT: So we've taken that testimony. I
22 do find that she's in default. I do find that she's
23 been properly served with notice of the hearing, but
24 she is entitled to due process of a chance to purchase
25 the property, and she may pursue that at or prior to

1 October 6, 2025, and therefore, if you want to put
2 that date in there, September 26th, 2025 because I
3 have learned that just because they're lawyers don't
4 mean they know how to read or do math, and especially
5 math.

6 So put that in there. She needs to let this
7 Court know by Friday of her desire to purchase the
8 property, and I need that in writing, and it should be
9 copied to counsel as well.

10 And if she doesn't do that, then the hearing
11 on October 6th, things should move very smoothly.

12 All right.

13 WITNESS: Thank you so much.

14 THE COURT: You're quite welcome. Thank you
15 for coming in.

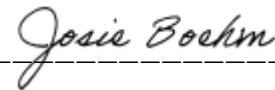
16 (Off the record at 2:51 p.m. on August 25th,
17 2025.)

1 COURT REPORTER'S CERTIFICATE

2
3 I DO HEREBY CERTIFY THAT THE TESTIMONY
4 CONTAINED IN SAID HEARING WAS, BY ME, REDUCED TO
5 WRITING IN THE PRESENCE OF SAID WITNESS BY MEANS OF A
6 COMPUTERIZED TRANSCRIPTION. THE SAID HEARING IS A
7 TRUE AND ACCURATE TRANSCRIPT OF THE WHOLE OF THE
8 TESTIMONY GIVEN BY SAID WITNESS, AS AFORESAID.

9 I DO FURTHER CERTIFY THAT I AM NOT CONNECTED
10 BY BLOOD OR MARRIAGE WITH ANY OF THE PARTIES OR THEIR
11 ATTORNEYS OR AGENTS, AND THAT I AM NOT AN EMPLOYEE OF
12 EITHER OF THEM, NOR INTERESTED DIRECTLY OR INDIRECTLY
13 IN THE MATTER OF CONTROVERSY EITHER AS COUNSEL,
14 ATTORNEY, AGENT, OR OTHERWISE.

15 SIGNED THIS THE 7th DAY OF OCTOBER 2025.

16 

17 JOSIE ALLEN BOEHM

18 My Commission Expires 10/18/32
19
20
21
22
23
24
25

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 08-28-2025 03:11:07 PM.

Logan Davis - Notification transmitted on 08-28-2025 03:11:07 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 08-28-2025 03:10:06 PM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Event(s):

Order/Order Cover Sheet \$25.00

Document(s) Submitted: Proposed Master/Order/Other

- Exhibit/Filing of Exhibits

Filed by or on behalf of: Logan Steele Davis

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

Certificate of Electronic Notification

Recipients

Stephen Graves - Notification transmitted on 09-03-2025 04:28:50 PM.

Logan Davis - Notification transmitted on 09-03-2025 04:28:50 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2023CP1006212

Official File Stamp: 09-03-2025 04:28:42 PM

Court: CIRCUIT COURT

Common Pleas

Charleston

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Document(s) Submitted: Master/Order/Partition Hearing

Master/Order/Other

- Exhibit/Filing of Exhibits Exhibit/Filing of Exhibits

Filed by or on behalf of: Mikell Scarborough

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Stephen Tyler Graves for Danielle C Brown

Logan Steele Davis for Danielle C Brown

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Crystal Brown Nwaneri

**STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
CHARLESTON COUNTY**

Case No. 2023-CP-6212

Danielle Brown,

Plaintiff,

v.

Crystal Brown Nwaneri,

Defendant.

2025 OCT -1 AM 10:37
CLERK OF COURT

20

NOTICE OF APPEAL

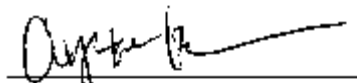
NOTICE IS HEREBY GIVEN that the Defendant, appearing *pro se*, hereby appeals to the South Carolina Court of Appeals from the orders entered in this matter by the Honorable Jennifer B. McCoy, Charleston County Clerk of Court Julie J. Armstrong, and Master-in-Equity Mikell R. Scarborough, including the September 3, 2025 order and all related orders dated April 18, 2024, September 17, 2024, September 19, 2024, and August 25, 2025.

This appeal is taken pursuant to Rule 203 of the South Carolina Appellate Court Rules.

The Plaintiff first sent written notice of the September 3, 2025 order on September 17, 2025, which was delivered on September 22, 2025 via FedEx Saver (Federal Express tracking number 884446967013).

True and correct copies of the orders being appealed are attached hereto collectively as Exhibits A, B, C, D, and E.

Respectfully submitted,



Crystal Brown Nwaneri, *pro se* Defendant
17293 Oakwood Lodge Lane
Piney Point, MD 20674
Phone: (917) 651-8546

Date: September 27, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Notice of Appeal on counsel for the Plaintiff by U.S. Mail, with delivery confirmation, addressed as follows:

Logan S. Davis, Esq.
Graves & Davis, LLC
1730 Central Park Road
Charleston, SC 29412
Phone: (843) 805-4649

This the 27th day of September, 2025.


Crystal Brown Nwaneri, *pro se* Defendant
17293 Oakwood Lodge Lane
Piney Point, MD 20674
Phone: (917) 651-8546

2025 OCT -1 AM 10:37
U.S. District Court
District of Columbia

(B)

EXHIBIT A

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE MASTER-IN-EQUITY COURT
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER
ON PARTITION HEARING**

This matter came before the Court on August 25, 2025, at 2:00 P.M., for a hearing on Plaintiff's action for partition by sale of real property located at 8297 Delhi Road, North Charleston, SC 29406. Present at the hearing were Plaintiff Danielle C. Brown ("Plaintiff") and her counsel, Logan S. Davis, Esq. and S. Tyler Graves, Esq. of Graves & Davis, LLC. Defendant Crystal Brown Nwaneri ("Defendant") was not present at the hearing.

PROCEDURAL HISTORY AND SERVICE

The Court finds that appropriate notice was provided to Defendant to appear at the hearing. The record reflects that Plaintiff's counsel filed extensive exhibits along with its Amended Memorandum in Support of Partition by Sale to establish appropriate notice, including:

1. Service by publication in *The Post and Courier* newspaper on May 22, May 29, and June 5, 2024;
2. Multiple attempts at notice to Defendant's last known address at 17293 Oakwood Lodge Lane, Piney Point, MD 20674;

3. For the January 29, 2025 hearing: successful delivery on January 21, 2025 (FedEx tracking #771449779691) and attempted delivery requiring signature (FedEx tracking #771449731962);
4. For the August 25, 2025 hearing: successful delivery on August 15, 2025 (FedEx tracking #883502622602) and successful signed delivery on August 15, 2025 (FedEx tracking #883502697920);
5. Email notice to Defendant at the email address previously used for communications in this matter.

The Court confirmed that Defendant is in default pursuant to Rule 55(a), SCRPC, having been entered on September 17, 2024, and has failed to make an appearance in this case.

FINDINGS OF FACT

Based on the testimony and evidence presented at the hearing, the Court makes the following findings of fact:

1. Plaintiff and Defendant each own a fifty percent (50%) undivided interest, as tenants-in-common, in the subject property located at 8297 Delbi Road, North Charleston, SC 29406, TMS No.: 485-06-00-026 (the "Property");
2. The Property is not encumbered by any mortgage.
3. The subject Property is the Plaintiff and Defendant's childhood home;
4. Plaintiff made attempts to discuss the disposition of the subject Property with Defendant, but has never received a clear answer regarding Defendant's intentions;
5. Plaintiff is agreeable to selling her interest to Defendant at fair market value;
6. Plaintiff wishes the Property to be sold in the event Defendant does not wish to purchase Plaintiff's interest;

7. Plaintiff has incurred costs and expenses related to the ownership of the Property, including landscaping expenses totaling \$6,300.00 from 2019 to present;
8. Plaintiff has incurred attorney's fees and costs related to this partition action;
9. Plaintiff will obtain an appraisal to determine fair market value of the Property.

CONCLUSIONS OF LAW

1. This Court has jurisdiction over the subject matter and the parties to this action;
2. Partition is available as a matter of right to any co-tenant under S.C. Code Ann. § 15-61-10;
3. The Property is not subject to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act;
4. Defendant has been provided appropriate notice as required for the Court to proceed with ordering partition proceedings;
5. Defendant is in default pursuant to Rule 55(a), SCRPC, having been entered on September 17, 2024, and has failed to make an appearance in this case.
6. Due process requires that Defendant be afforded an opportunity to purchase Plaintiff's interest before the Property is sold to third parties.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. Standing Order Application: The Standing Order in All Partition Actions dated December 20, 2007, is applicable to this case in order to protect the due process rights of Defendant regardless of her default status. A copy of the Court's Standing Order is incorporated herein as Exhibit A and made a part of this Order.

2. Election to Purchase: Defendant shall be granted an opportunity to elect to purchase Plaintiff's fifty percent (50%) interest in the Property, pursuant to the December 20, 2007 Standing Order.
3. Deadline for Election: Defendant shall have until September 26, 2025, to notify the Court and Plaintiff's counsel in writing of Defendant's decision to purchase Plaintiff's interest and the proposed terms of such purchase, if Defendant decides to do so.
4. Method of Notice: Any notice from Defendant shall be filed with the Court and served upon Plaintiff's counsel at the address of 1730 Central Park Road, Charleston, SC 29412.
5. Hearing on Election: A hearing is scheduled for October 6, 2025, at 1:00 P.M., at which time the Court will determine whether Defendant has elected to purchase the Property and, if so, will address the terms of such purchase.
6. Notice of Hearing: Plaintiff's counsel shall provide notice of the October 6, 2025 hearing to Defendant using the same methods of service as were used for the August 25, 2025 hearing.
7. Determination of Value: Plaintiff will obtain an appraisal to determine fair market value of the Property.
8. Preservation of Rights: This Order preserves Plaintiff's rights to seek partition by sale, reimbursement for expenses, and attorney's fees and costs.

[MASTER-IN-EQUITY'S SIGNATURE PAGE TO FOLLOW.]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Master/Order/Other

So Ordered

s/Mikell R. Scarborough 3062

Electronically signed on 2025-09-03 15:33:50 page 5 of 5

EXHIBIT A
Standing Order In All
Partition Actions

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE MASTER IN EQUITY COURT
FOR CHARLESTON COUNTY

STANDING ORDER IN ALL PARTITION ACTIONS

This court is now regularly seeing partition actions in which the purpose of the action is the contemplated sale of the real estate contained therein. Therefore, pursuant to Section 15-61-25, 1976 SC Code of Laws, as Amended, (2007 Supp.), this court shall require Notice of the requirements of this statute to be served upon all parties in the action and upon all joint tenants or tenants in common. This statute states:

"The Court shall provide for the non-petitioning joint tenants or tenants in common who are interested in purchasing the property to notify the Court of that interest no later than ten (10) days prior to the date set for the trial of the case. The non-petitioning joint tenants or tenants in common shall be allowed to purchase the interests in the property as provided in this section whether default has been entered against them or not." 1976 SC Code of Laws, Section 15-61-25 (A).

This notice shall be served upon all parties and the required tenants in common at the time the Notice of Hearing is served herein. Proof of service of the Notice of Hearing and this Order providing Notice to the tenants of their rights in the property shall be required at the time of the hearing.

IT IS SO ORDERED!

December 20, 2007
Charleston, South Carolina

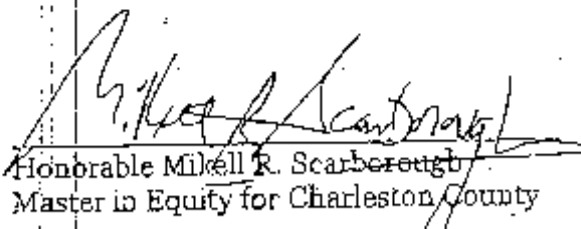

Honorable Mikell R. Scarborough
Master in Equity for Charleston County

EXHIBIT B



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Publication

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Electronically signed on 2024-04-18 12:46:55 page 4 of 4

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**MOTION AND ORDER FOR
SERVICE BY PUBLICATION**

YOU WILL PLEASE TAKE NOTICE that Plaintiff, Danielle C. Brown (hereinafter referred to as the "Plaintiff"), by and through her undersigned counsel for purpose effectuating service upon the above-captioned Defendant (hereinafter referred to as "Defendant") move before this Honorable Court, for an Order authorizing service by publication of the above referenced matter, on the basis that the Defendant still has not been personally served. The Plaintiff has not been able to effectuate service pursuant to ordinary means: personal service or substituted service, and upon information and belief, the Defendant is aware of this matter, has made no attempt to provide her whereabouts to any other parties and is actively endeavoring to evade service.

FACTS

1. On or about December 21, 2023, Plaintiff initiated the subject partition action by filing a Summons and Complaint in this Court.
2. Plaintiff obtained Defendant's address from prior knowledge, current legal proceedings, and other public records.
3. Plaintiff hired ABC Legal, a company engaged in the business of performing skip-traces and serving legal documents, to serve the Summons and Complaint on Defendant.

4. ABC Legal attempted service on Defendant on January 10, 2024, January 12, 2024, January 14, 2024, and January 16, 2024. However, these attempts were unsuccessful.
5. ABC Legal returned a signed proof of non-service document which has been filed with this Court.
6. In an attempt to further investigate the location of Defendant, ABC Legal ran a skip trace on Defendant, which confirmed Defendant resides at the location where ABC Legal had attempted service of process on Defendant.
7. Further, ABC Legal or its representatives have spoke with the neighboring property owner(s) and confirmed Defendant lives at the location where ABC Legal had attempted service of process on Defendant.
8. ABC Legal again attempted to serve Defendant following the skip trace on March 4, 2024, March 10, 2024, March 13, 2024, and March 17, 2024.
9. On March 17, 2024, Timothy Allen, a representative of ABC Legal, spoke with an unknown individual who identified themselves as the resident of the location; however, the person refused to open the door.
10. ABC Legal returned a second signed proof of non-service document which has been filed with this Court.
11. To date the Defendant has not attempted to contact Plaintiff's attorney or process server.

APPLICABLE LAW

S.C. Code Ann. § 15-9-710 authorizes service of the summons be made by publication when, after due diligence, the person to be served cannot be found within the State and that fact appears by affidavit to the satisfaction of the court...and it in like manner appears that the cause of action exists against the defendant in respect to whom the service is to be made or that he is a

proper party to an action relating to real property in this state...when the subject of the action is real or personal property in this State and the defendant has or claims a lien or interest, actual or contingent, therein or the relief demanded consists wholly or partly in excluding the defendant from any interest or lien therein.

CONCLUSION OF LAW

Based on this Motion and the affidavits of non-service filed with this Court, which are incorporated herein by reference, I find that the Plaintiff is entitled to effectuate service by publication regarding Defendant.

WHEREFORE, Plaintiff moves this Court for an order of service by publication.

IT IS THEREFORE ORDERED, that Plaintiff is granted leave to effectuate service by publication pursuant to S.C. Code § 15-9-740 in the Post & Courier, a newspaper of common circulation in Charleston County.

_____, 2024.

Presiding Judge for Charleston County

I SO MOVE:

s/Logan S. Davis
Logan S. Davis, Esq.
Graves & Davis, LLC
125 Wappoo Creek Dr.
Bldg. E, Suite 102
Charleston, SC 29412
Phone: 843-805-4649
Facsimile: 843-620-1047
Ldavis@gravesdavis.com
Attorney for the Plaintiff's

Date: April 16, 2024

EXHIBIT C

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

ORDER FOR ENTRY OF DEFAULT

UPON reading and consideration of the Motion for Entry of Default, the Affidavit of Default, the Affidavit of Service of Defendant Crystal Brown Nwaneri, it is hereby.

ORDERED, ADJUDGED, AND DECREED that Defendant Crystal Brown Nwaneri is in default herein; it is further

ORDERED, ADJUDGED, AND DECREED that the Clerk enter default upon the record pursuant to Rule 55(a). SCRCP for Defendant Crystal Brown Nwaneri.

IT IS SO ORDERED

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Entry of Default

So Ordered

s/Jennifer B. McCoy #2764

Electronically signed on 2024-09-17 09:26:14 page 2 of 2

EXHIBIT D

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

C/A No.: 2023-CP-10-06212

**ORDER OF REFERENCE TO
THE MASTER-IN-EQUITY**

UPON reading the Plaintiff's Motion for Reference to the Master-in-Equity, and upon consideration of same, and it being made to appear to my satisfaction that this matter involves a partition action to real property.

THEREFORE, IT IS ORDERED, ADJUDGED and DECREED that this case be, and the same is hereby, referred pursuant to SCRPC Rule 53 to The Honorable Mikell R. Scarborough, Master-in-Equity for Charleston County, to take testimony and issue a Final Decree, with any appeal from the Master to be directly to the South Carolina Supreme Court or the Court of Appeals.

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Master-in-Equity is given authority to hear any and all post-trial motions, including, but not limited to, motions under Rules 52, 59 and 60, SCRPC.

AND IT IS SO ORDERED!

[ELECTRONIC SIGNATURE PAGE TO FOLLOW]



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Order/Referred to Master or Special Referee

So Ordered

s/Julie J. Armstrong, Charleston County Clerk of
Court, by BLC

Electronically signed on 2024-09-19 11:25:09 page 2 of 2

EXHIBIT E

----- Forwarded message -----

From: MIELawClerk <MIELawClerk@charlestoncounty.org>
Date: Mon, Aug 25, 2025 at 11:17 AM
Subject: RE: Clarification re: Hearing Scheduled for August 25, 2025
To: Crystal Brown <crystal.brown@gmail.com>, ldavis@gravesdavis.com <ldavis@gravesdavis.com>
Cc: Martha S. Dennis <MDennis@charlestoncounty.org>, Tyler Graves <tgraves@gravesdavis.com>

Good morning,

Upon review of the communications and filings in this case, Judge Scarborough has determined that the Defendant did receive proper notice of the hearing and will proceed with the in-person hearing scheduled today for 2:00 p.m. The Court will not allow for the virtual or telephone participation by either party. Additionally, this Court notes that this hearing was continued from the January 29, 2025 date and that the Defendant was found to be in default in September 2024. Thus, the partition hearing set for 2:00 p.m. today will proceed as previously scheduled.

Thank you very much.

Lillian P. Wilkerson, Esq.
Judicial Law Clerk
Charleston County Master In Equity
100 Broad Street, Suite 266
Charleston, SC 29401
Ph: (843) 958-5075
MIELawClerk@charlestoncounty.org

From: Crystal Brown <crystal.brown@gmail.com>
Sent: Monday, August 25, 2025 10:25 AM
To: ldavis@gravesdavis.com
Cc: MIELawClerk <MIELawClerk@charlestoncounty.org>; Martha S. Dennis <MDennis@charlestoncounty.org>; Tyler Graves <tgraves@gravesdavis.com>
Subject: Clarification re: Hearing Scheduled for August 25, 2025

CAUTION: This email originated outside of Charleston County. Do not click links or open attachments from unknown senders or suspicious emails. If you are not sure, please contact IT helpdesk.

Dear Ms. Wilkerson and Honorable Court:

I write to clarify the record regarding today's scheduled hearing. Contrary to Plaintiff's representations below, I have not consented to, nor requested, that the hearing proceed by WebEx or any other virtual platform. Plaintiff's counsel's offer of a WebEx link is procedurally immaterial unless and until the Court orders such an appearance.

My request remains exactly as stated in my prior correspondence: if the Court nevertheless elects to proceed with the hearing over my timely objections, I respectfully request leave to participate by telephone in order to mitigate the prejudice resulting from insufficient and defective notice. This conditional request in no way constitutes a waiver of my objections or consent to the proceeding.

I do so preserve my objection to Plaintiff's memorandum in support, which was filed the business day before the hearing, among other improper filings. That submission was untimely and prejudicial and should be stricken from the record.

In light of the hearing scheduled for 2:00 p.m. today, I respectfully request that the Court advise of its position at the earliest possible time so that I may make the necessary logistical arrangements.

Respectfully,

Crystal Brown Nwaneri

Defendant, Pro Se

On Mon, Aug 25, 2025 at 10:11 AM Logan Davis <ldavis@gravesdavis.com> wrote:

Ms. Wilkerson,

While we stand firm that notice has been effectuated, in an effort to go forward with this hearing, we are open to a virtual hearing. However, if the Court is willing to accommodate Defendant's request to have a virtual hearing, we would respectfully request it to be conducted via WebEx. Of course, we still plan on appearing at Court today unless the Court instructs otherwise.

Further, I wanted to note that Plaintiff also lives out of state; however, she has made accommodations to be here for the hearing.

Thank you all for your time and attention to this matter.

Sincerely,

Logan S. Davis, Esq.
Partner/Attorney
Graves & Davis, LLC