



THE STATE OF SOUTH CAROLINA
In the Court of Appeals
Appellate Case No. 2026-000231

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable Thomas J. Rode, Circuit Court Judge, Berkeley County

Case No. 2014-CP-08-02072

Portfolio Recovery Associates, LLC

Respondent,

v.

Rhonda Chambers,

Appellant.

RESPONDENT'S MOTION TO STRIKE APPELLANT'S DESIGNATION OF MATTER TO
BE INCLUDED IN RECORD ON APPEAL

Pursuant to Rule 240(c)(2)-(3), SCACR, Plaintiff-Respondent Portfolio Recovery Associates, LLC (hereinafter "PRA"), by and through its undersigned counsel, hereby submits this memorandum and the attached affidavit in support of its motion to strike appellant's designation of matter to be included in the record on appeal. For the reasons stated herein, the Court should grant the motion.

BACKGROUND

On November 10, 2025, the Court of Common Pleas entered its Order following a bench trial, heard on September 3 and 4, 2025, finding in favor of PRA and against Chambers on all claims (hereinafter the “Trial Order”). *See* Affidavit of David A. Grassi, Jr. (“Grassi Aff.”), ¶¶ 4-5, Ex. 1-3. Chambers, in her own Rule 59(e) motion, admitted she received written notice of entry of the Trial Order on November 10, 2025. *See* Grassi Aff., ¶ 6, Ex. 4.

On November 21, 2025, Chambers filed and served a motion pursuant to Rule 59(e), SCRCP, seeking to alter or amend the Trial Order (the “Rule 59(e) Motion”). *See* Grassi Aff., ¶¶ 4, 6, Ex. 1, 4-5. Chambers’ initial attempt to file her Rule 59(e) Motion on November 20, 2025, after the close of business, was rejected by the Clerk of Court. *See* Initial Brief of Appellant, p. 5. Counsel for Chambers contends it was rejected for not having a proposed order or request for a hearing attached. *Id.* As a result, the Rule 59(e) Motion was not filed and served until November 21, 2025, at 12:33 p.m., more than ten days after Chambers’ receipt of written notice of entry of the Trial Order. *See* Grassi Aff., ¶¶ 4, 6, Ex. 1, 4-5.

On December 15, 2025, PRA filed its Response in Opposition to Chambers’ Rule 59(e) Motion, arguing, *inter alia*, that the motion was untimely because it was not *served* within ten days of Chambers’ receipt of notice of the Trial Order, as required by Rule 59(e), SCRCP. *See* Grassi Aff., ¶ 7, Ex. 6-7. PRA opposed any reliance by Chambers on any rejected filing, noting that Rule 59(e) requires *service*, not filing, within ten days. *Id.* PRA further argued that the clerk neither made a mistake nor

was there an issue with formatting. *Id.* Similarly, Chambers has also not requested that the service of its untimely motion be granted relief from the court for good cause shown in its filings, *see* Grassi Aff., ¶ 4, Ex. 1, yet now seeks to introduce NEF emails into the court record for the first time. On December 22, 2025, the trial court entered an Order Form 4 denying the Rule 59(e) Motion while “assuming without deciding” that the motion was timely¹. *See* Grassi Aff, ¶ 8, Ex. 8-9. Chambers filed her Notice of Appeal on January 19, 2026.

On May 15, 2026, Chambers filed her Designation which contained Item 16: “NEF emails from Rule 59(e) motion filing.” The Designation does not identify or describe the emails with any particularity. PRA submits that Chambers’ Designation of item sixteen does not clearly delineate or identify what emails she intends to include on the Record on Appeal. Moreover, to the extent this designation includes emails that are not in the Court record, PRA objects to their inclusion in the Record on Appeal, even if identified or otherwise produced. PRA now formally moves to strike Item 16 of Chambers’ Designation for the reasons set forth below.

LAW

The appellate rules are clear: only matter that is presented to the trial court may be included in the record on appeal. *See* Rule 210(c), SCACR (the Record on Appeal “shall include all matter designated to be included by any party under Rule

¹ At the time of trial, PRA had dismissed its claims against Chambers following her bankruptcy discharge, leaving only Chambers’ counterclaims to be tried. This, appearing to PRA, explains why the Court’s Order Form 4 refers to the Rule 59(e) motion as “Plaintiff’s” motion, since the motion was filed by Chambers, not PRA. The motion was denied in this December 22, 2025, Order.

209,” but “shall not . . . include matter which was not presented to the lower court or tribunal.”) A party may move to strike or oppose matter from an opposing party’s designation under Rules 240 and 210, SCACR. “The South Carolina Appellate Court Rules are not mere technicalities but provide the parties and this Court with an orderly mechanism through which to guide appeals in this State.” *Henning v. Kaye*, 307 S.C. 436, 415 S.E.2d 794 (1992).

ARGUMENT

Chambers seeks to include in the record on appeal “NEF emails from Rule 59(e) motion filing.” *See* Appellant’s Designation of Matter to be Included in Record on Appeal. While those emails are not described with specificity, no such emails were included with Chambers’ Rule 59 motion. *See* Grassi Aff., ¶¶ 4, 6, Ex. 1, 4-5. The only item that appears to be of record in the trial court index is the Certificate of Electronic Notification sent in conjunction with the November 21, 2025 filing. *Id.* PRA is informed and believes, however, that the emails referenced in Chambers’ Designation of Matter as Item No. 16 relate to Chambers’ *rejected* filing of the Rule 59 motion and predate the 12:33 p.m., November 21, 2025 filed motion.

Such matter should be stricken from the Designation of Matter and not included in the Record on Appeal because the emails were neither presented to the trial court nor filed with the Court, and they have not been authenticated. *See* Rule 210(c), SCAR; *Argabright v. Argabright*, 398 S.C. 176, 727 S.E.2d 748 (2012). Because the materials listed do not appear to have been filed with the Court, *see* Grassi Aff., ¶¶ 4, 6, Ex. 1, 4-5, they should be stricken from Chambers’ Designation of Matter.

CONCLUSION

For the foregoing reasons, PRA respectfully requests that this Court strike Item No. 16 – “NEF emails from Rule 59(e) motion filing” – from Chambers’ Designation of Matter to Be Included in the Record on Appeal, and order that those materials shall not be included in the Record on Appeal.

Dated: July 15, 2026.

Respectfully submitted,

Frost Echols LLC

/s/ David A. Grassi, Jr.

David A. Grassi, Jr. (SC Bar No. 102525)

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Attorney for Respondent

CERTIFICATE OF SERVICE

I certify that on July 15, 2026, I served a copy of the foregoing **RESPONDENT'S MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO STRIKE** upon all counsel of record in this action by email to the following addresses:

John R. Cantrell, Jr.
johncantrelljr@gmail.com

/s/ David A. Grassi, Jr. _____

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Case No. 2014-CP-08-02072

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v.

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Appellant.

AFFIDAVIT OF DAVID A. GRASSI, JR.

Before me, the undersigned authority, personally appeared David A. Grassi, Jr., who being first duly sworn according to law, deposes and says as follows:

1. This Affidavit is filed in support of *Respondent's Motion to Strike Appellant's Designation of Matter to be Included in Record on Appeal* ("Motion to Strike") in the above-captioned matter. The testimony set forth in this affidavit is based on first-hand knowledge and on the undersigned's review of available public records.

2. I am attorney with Frost Echols, LLC (“Frost Echols”), practicing primarily in the area of civil litigation.

3. I am licensed to practice law in the State of South Carolina and am the attorney of record for Portfolio Recovery Associates, LLC (“PRA”) in this case.

4. On July 15, 2026, I reviewed the South Carolina public index for Berkley County, and specifically for Case No. 2014-CP-08-02072. Attached as Exhibit 1 is a true and accurate copy of the public index for Case No. 2014-CP-08-02072 as it appeared in my review.

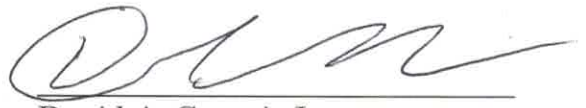
5. The public index shows that the trial court entered and served an order on November 10, 2025. Attached as Exhibit 2 is a true and accurate copy of the order as downloaded from the public index, and attached as Exhibit 3 is a true and accurate copy of the NEF associated with the November 10, 2025 order, as downloaded from the public index.

6. The public index shows Rhonda Chambers filed a “Motion / Alter and/or Amend” on November 21, 2025. Attached as Exhibit 4 is a true and accurate copy of the motion as downloaded from the public index, and attached as Exhibit 5 is a true and accurate copy of the NEF associated with the November 21, 2025 motion, as downloaded from the public index.

7. The public index shows PRA filed its opposition to the Motion to Alter or Amend on December 15, 2026. Attached as Exhibit 6 is a true and accurate copy of the motion as downloaded from the public index, and attached as Exhibit 7 is a true and accurate copy of the NEF associated with the December 15, 2026 opposition, as downloaded from the public index.

8. The public index shows the Court entered an Order From 4 denying the Rule 59(e) motion on December 22, 2025. Attached as Exhibit 8 is a true and accurate copy of the order as downloaded from the public index, and attached as Exhibit 9 is a true and accurate copy of the NEF associated with the December 22, 2025 order, as downloaded from the public index.

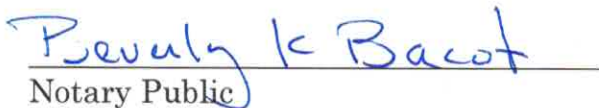
FURTHER AFFIANT SAYETH NOT.



David A. Grassi, Jr.

Sworn to and subscribed before me

this 15th day of July, 2025


Notary Public

My commission expires: 8/20/2031



EXHIBIT 1



Berkeley County 9th Judicial Circuit Public Index



[Berkeley County Home Page](#) [South Carolina Judicial Department Home Page](#) [SC.GOV Home Page](#)

Switch View

Portfolio Recovery Associates, Llc , plaintiff, et al VS Rhonda Chambers

Case Number:	2014CP0802072	Court Agency:	Common Pleas	Filed Date:	09/15/2014
Case Type:	Common Pleas	Case Sub Type:	Debt Collection 110	File Type:	Non-Jury
Status:	Appeal	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:	Removed to Other Court (Fed or District)	Disposition Date:	11/10/2025	Disposition Judge:	Rode, Thomas J.
Original Source Doc:		Original Case #:		Restore Reason:	Reopened Case
Judgment Number:	2014CP0802072	Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Chambers, Rhonda	NEF(01-29-2026 07:44:08 PM) Appeal/Notice of Appeal to C...	Filing		01/30/2026-09:49		
Chambers, Rhonda	Appeal/Notice of Appeal to Court of Appeals	Filing		01/29/2026-19:44		
Portfolio Recovery Associates, Llc	NEF(12-22-2025 01:12:50 PM) Order/Electronic Form 4	Filing		12/22/2025-13:13		
Portfolio Recovery Associates, Llc	Order/Electronic Form 4	Order		12/22/2025-13:12		
Chambers, Rhonda	NEF(12-22-2025 12:47:33 PM) Order/Electronic Form 4	Filing		12/22/2025-12:47		
Chambers, Rhonda	Order/Electronic Form 4	Order		12/22/2025-12:47		
Portfolio Recovery Associates, Llc	NEF(12-15-2025 04:45:30 PM) Response	Filing		12/15/2025-16:56		
Portfolio Recovery Associates, Llc	Response	Filing		12/15/2025-16:45		
Chambers, Rhonda	NEF(11-21-2025 12:33:56 PM) Motion/Alter and/or Amend	Filing		11/21/2025-13:03		
Chambers, Rhonda	Motion/Alter and/or Amend	Motion		11/21/2025-12:33	12/22/2025-12:33	
Chambers, Rhonda	NEF(11-12-2025 05:36:00 PM) Memo/Memo	Filing		11/13/2025-09:17		
Chambers, Rhonda	Memo/Memo	Filing		11/12/2025-17:36		
Portfolio Recovery Associates, Llc	NEF(11-10-2025 01:15:02 PM) Order/Other	Filing		11/10/2025-13:15		
Portfolio Recovery	Order/Other	Order		11/10/2025-13:15		

Associates, Llc						
Portfolio Recovery Associates, Llc	NEF(11-07-2025 05:02:57 PM) Memo/Memo in Opposition	Filing		11/10/2025-09:34	11/10/2025-09:34	
Portfolio Recovery Associates, Llc	Memo/Memo in Opposition	Filing		11/07/2025-17:02	11/10/2025-17:02	
James, Sharonda	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		11/04/2025-09:32	11/10/2025-09:32	
Tillman, Jesse M. III	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		11/04/2025-09:32	11/10/2025-09:32	
Grassi, David Anthony Jr.	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		11/04/2025-09:32	11/10/2025-09:32	
Cantrell, John R Jr.	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		11/04/2025-09:32	11/10/2025-09:32	
Grassi, David Anthony Jr.	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		10/24/2025-13:39	11/10/2025-13:39	
Cantrell, John R Jr.	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		10/24/2025-13:39	11/10/2025-13:39	
Tillman, Jesse M. III	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		10/24/2025-13:39	11/10/2025-13:39	
James, Sharonda	11/10/2025_MOTHEA_Roster/Notice of Motions Roster Publicatio	Action		10/24/2025-13:39	11/10/2025-13:39	
Chambers, Rhonda	NEF(10-03-2025 02:21:11 PM) Letter/Letter	Filing		10/03/2025-14:32	11/10/2025-14:32	
Chambers, Rhonda	Letter/Letter	Filing		10/03/2025-14:21	11/10/2025-14:21	  
Chambers, Rhonda	NEF(10-03-2025 01:56:14 PM) Motion/Sanctions	Filing		10/03/2025-14:13	11/10/2025-14:13	
Chambers, Rhonda	Motion/Sanctions	Motion		10/03/2025-13:56	11/13/2025-13:56	
Portfolio Recovery Associates, Llc	Exhibit/Exhibit List	Filing		09/04/2025-14:04	11/10/2025-14:04	
Portfolio Recovery Associates, Llc	NEF(09-02-2025 07:00:13 PM) Reply/Reply to Counterclaim	Filing		09/03/2025-09:34	11/10/2025-09:34	
Portfolio Recovery Associates, Llc	NEF(09-02-2025 06:58:17 PM) Response	Filing		09/03/2025-09:21	11/10/2025-09:21	
Portfolio Recovery Associates, Llc	Reply/Reply to Counterclaim	Filing		09/02/2025-19:00	11/10/2025-19:00	
Portfolio Recovery Associates, Llc	Response	Filing		09/02/2025-18:58	11/10/2025-18:58	
Chambers, Rhonda	NEF(08-29-2025 12:13:37 PM) Motion/Summary Judgment	Filing		08/29/2025-12:17	11/10/2025-12:17	
Chambers, Rhonda	Motion/Summary Judgment	Motion		08/29/2025-12:13	11/10/2025-12:13	   
Chambers, Rhonda	NEF(08-28-2025 09:29:10 PM) Motion/Leave to Amend	Filing		08/29/2025-09:38	11/10/2025-09:38	
Chambers, Rhonda	Motion/Leave to Amend	Motion		08/28/2025-21:29	11/10/2025-21:29	   
Portfolio Recovery Associates, Llc	NEF(08-27-2025 10:19:43 AM) Response	Filing		08/27/2025-10:35	11/10/2025-10:35	
Portfolio Recovery	Response	Filing		08/27/2025-10:19	11/10/2025-10:19	   

Associates, Llc						
Chambers, Rhonda	NEF(08-22-2025 09:01:38 PM) Motion/Restore Case	Filing		08/25/2025-10:20	11/10/2025-10:20	
Chambers, Rhonda	Motion/Restore Case	Motion		08/22/2025-21:01	11/10/2025-21:01	  
Portfolio Recovery Associates, Llc	NEF(08-21-2025 03:08:20 PM) Order/Electronic Form 4	Filing		08/21/2025-15:08	06/17/2025-15:08	
Portfolio Recovery Associates, Llc	Order/Electronic Form 4/Continue	Order		08/21/2025-15:08	06/17/2025-15:08	
Chambers, Rhonda	NEF(08-13-2025 11:58:29 PM) Memo/Memo in Opposition	Filing		08/14/2025-09:28	06/17/2025-09:28	
Portfolio Recovery Associates, Llc	NEF(08-13-2025 10:56:29 PM) Memo/Memo in Support	Filing		08/14/2025-09:21	06/17/2025-09:21	
Chambers, Rhonda	Memo/Memo in Opposition	Filing		08/13/2025-23:58	06/17/2025-23:58	
Portfolio Recovery Associates, Llc	Memo/Memo in Support	Filing		08/13/2025-22:56	06/17/2025-22:56	
Portfolio Recovery Associates, Llc	NEF(08-08-2025 10:32:05 AM) Order/Order Cover Sheet \$25....	Filing		08/08/2025-10:58	06/17/2025-10:58	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		08/08/2025-10:32	06/17/2025-10:32	
James, Sharonda	8/18/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		08/04/2025-14:49	06/17/2025-14:49	
Tillman, Jesse M. III	8/18/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		08/04/2025-14:49	06/17/2025-14:49	
Grassi, David Anthony Jr.	8/18/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		08/04/2025-14:49	06/17/2025-14:49	
Cantrell, John R Jr.	8/18/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		08/04/2025-14:49	06/17/2025-14:49	
Tillman, Jesse M. III	9/3/2025_NJT_Roster/Notice of Case Roster Publication Sent	Action		08/01/2025-12:21	06/17/2025-12:21	
James, Sharonda	9/3/2025_NJT_Roster/Notice of Case Roster Publication Sent	Action		08/01/2025-12:21	06/17/2025-12:21	
Cantrell, John R Jr.	9/3/2025_NJT_Roster/Notice of Case Roster Publication Sent	Action		08/01/2025-12:21	06/17/2025-12:21	
Grassi, David Anthony Jr.	9/3/2025_NJT_Roster/Notice of Case Roster Publication Sent	Action		08/01/2025-12:21	06/17/2025-12:21	
Portfolio Recovery Associates, Llc	NEF(07-15-2025 06:10:13 PM) Motion/Leave to Amend	Filing		07/16/2025-09:16	06/17/2025-09:16	
Portfolio Recovery Associates, Llc	*Amended* Motion/Leave to Amend	Motion		07/15/2025-18:10	06/17/2025-18:10	
Portfolio Recovery Associates, Llc	NEF(07-15-2025 02:07:56 PM) Motion/Leave to Amend	Filing		07/15/2025-14:33	06/17/2025-14:33	
Portfolio Recovery Associates, Llc	Motion/Leave to Amend	Motion		07/15/2025-14:07	07/15/2025-14:07	
Chambers, Rhonda	Order of Bankruptcy Discharge	Order		07/07/2025-14:31	06/17/2025-14:31	

Portfolio Recovery Associates, Llc	NEF(07-07-2025 02:16:40 PM) Stipulation Of Dismissal	Filing		07/07/2025-14:29	06/17/2025-14:29	
Portfolio Recovery Associates, Llc	Stipulation Of Dismissal	Filing		07/07/2025-14:16	06/17/2025-14:16	
Cantrell, John R Jr.	7/21/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/07/2025-10:14	06/17/2025-10:14	
Grassi, David Anthony Jr.	7/21/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/07/2025-10:14	06/17/2025-10:14	
Tillman, Jesse M. III	7/21/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/07/2025-10:14	06/17/2025-10:14	
James, Sharonda	7/21/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/07/2025-10:14	06/17/2025-10:14	
Portfolio Recovery Associates, Llc	Decline to Sign:Order/Other	Filing		07/02/2025-16:55	06/17/2025-16:55	
Portfolio Recovery Associates, Llc	NEF(06-26-2025 03:39:45 PM) Motion/Other	Filing		06/26/2025-16:20	06/17/2025-16:20	
Portfolio Recovery Associates, Llc	Motion/Other/ Set aside Notice of Dismissal	Motion		06/26/2025-15:39	07/23/2025-15:39	
Chambers, Rhonda	NEF(06-23-2025 05:00:51 PM) Response	Filing		06/24/2025-12:41	06/17/2025-12:41	
Chambers, Rhonda	Response	Filing		06/23/2025-17:00	06/17/2025-17:00	
Portfolio Recovery Associates, Llc	NEF(06-20-2025 04:11:04 PM) Letter/Letter	Filing		06/20/2025-16:17	04/10/2025-16:17	
Portfolio Recovery Associates, Llc	Letter/Letter	Filing		06/20/2025-16:11	04/10/2025-16:11	
Portfolio Recovery Associates, Llc	NEF(06-17-2025 07:23:23 AM) Voluntary Dismissal Of	Filing		06/17/2025-09:16	04/10/2025-09:16	
Portfolio Recovery Associates, Llc	Notice/Notice of Appearance	Filing		06/17/2025-07:23	04/10/2025-07:23	
Portfolio Recovery Associates, Llc	Voluntary Dismissal Of	Filing		06/17/2025-07:23	04/10/2025-07:23	
Portfolio Recovery Associates, Llc	NEF(04-24-2025 12:19:26 PM) Judgment/Satisfaction of Jud...	Filing		04/24/2025-12:32	04/10/2025-12:32	
Portfolio Recovery Associates, Llc	Judgment/Satisfaction of Judgment	Filing		04/24/2025-12:19	04/10/2025-12:19	
Portfolio Recovery Associates, Llc	NEF(04-18-2025 01:38:47 PM) Judgment/Satisfaction of Jud...	Filing		04/21/2025-10:38	04/10/2025-10:38	
Portfolio Recovery Associates, Llc	Judgment/Satisfaction of Judgment	Filing		04/18/2025-13:38	04/10/2025-13:38	
Portfolio Recovery	NEF(04-10-2025 04:25:03 PM) Order/Sanctions	Filing		04/10/2025-16:25	04/10/2025-16:25	

Associates, Llc						
Portfolio Recovery Associates, Llc	Order/Sanctions/Judgment	Order		04/10/2025-16:25	04/10/2025-16:25	
Cantrell, John R Jr.	Judgment/Judgment	Judgment		04/10/2025-11:41	04/10/2025-11:41	
Portfolio Recovery Associates, Llc	Judgment/Judgment	Judgment		04/10/2025-11:41	04/10/2025-11:41	
Portfolio Recovery Associates, Llc	Notice of Bankruptcy	Filing		04/04/2025-16:00	04/10/2025-16:00	
Portfolio Recovery Associates, Llc	NEF(03-28-2025 04:48:19 PM) Order/Electronic Form 4	Filing		03/28/2025-16:48	04/10/2025-16:48	
Portfolio Recovery Associates, Llc	Order/Electronic Form 4/Non-Jury Trial Roster	Order		03/28/2025-16:48	04/10/2025-16:48	
Portfolio Recovery Associates, Llc	NEF(03-28-2025 10:28:38 AM) Order/Electronic Form 4	Filing		03/28/2025-10:28	04/10/2025-10:28	
Portfolio Recovery Associates, Llc	Order/Electronic Form 4/Non-Jury Trial	Order		03/28/2025-10:28	04/10/2025-10:28	
Chambers, Rhonda	NEF(03-18-2025 05:20:37 PM) Memo/Memo in Opposition	Filing		03/19/2025-09:22	04/10/2025-09:22	
Chambers, Rhonda	Memo/Memo in Opposition	Filing		03/18/2025-17:20	04/10/2025-17:20	   
Tillman, Jesse M. III	3/17/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		03/04/2025-09:36	04/10/2025-09:36	
Grassi, David Anthony Jr.	3/17/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		03/04/2025-09:36	04/10/2025-09:36	
Cantrell, John R Jr.	3/17/2025_MOTHEA_Roster/Notice of Motions Roster Publication	Action		03/04/2025-09:36	04/10/2025-09:36	
Portfolio Recovery Associates, Llc	NEF(02-06-2025 02:18:24 PM) Motion/Other	Filing		02/06/2025-14:55	04/10/2025-14:55	
Portfolio Recovery Associates, Llc	Motion/Other	Motion		02/06/2025-14:18	04/10/2025-14:18	
Portfolio Recovery Associates, Llc	NEF(01-16-2025 10:35:59 AM) Order/Order Cover Sheet \$25....	Filing		01/16/2025-11:32	04/10/2025-11:32	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		01/16/2025-10:35	04/10/2025-10:35	
Portfolio Recovery Associates, Llc	NEF(01-16-2025 10:31:47 AM) Affidavit/Affidavit of Costs	Filing		01/16/2025-10:35	04/10/2025-10:35	
Portfolio Recovery Associates, Llc	Affidavit/Affidavit of Costs	Filing		01/16/2025-10:31	04/10/2025-10:31	
Portfolio Recovery Associates, Llc	NEF(01-10-2025 01:54:10 PM) Order/Sanctions	Filing		01/10/2025-13:54	04/10/2025-13:54	

Portfolio Recovery Associates, Llc	Order/Sanctions	Order		01/10/2025-13:54	04/10/2025-13:54	
Portfolio Recovery Associates, Llc	NEF(01-10-2025 01:53:18 PM) Order/Summary Judgment	Filing		01/10/2025-13:53	04/10/2025-13:53	
Portfolio Recovery Associates, Llc	Order/Summary Judgment	Order		01/10/2025-13:53	04/10/2025-13:53	
Tillman, Jesse M. III	2/3/2025_NJT_Roster/Notice of Case Roster Publication Sent	Action		01/03/2025-15:10	04/10/2025-15:10	
Grassi, David Anthony Jr.	2/3/2025_NJT_Roster/Notice of Case Roster Publication Sent	Action		01/03/2025-15:10	04/10/2025-15:10	
Cantrell, John R Jr.	2/3/2025_NJT_Roster/Notice of Case Roster Publication Sent	Action		01/03/2025-15:10	04/10/2025-15:10	
Chambers, Rhonda	NEF(10-25-2024 11:59:11 PM) Proposed Order/Summary Judgm...	Filing		10/28/2024-09:29	04/10/2025-09:29	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		10/25/2024-23:59	04/10/2025-23:59	
Portfolio Recovery Associates, Llc	NEF(10-25-2024 04:28:04 PM) Order/Order Cover Sheet \$25....	Filing		10/25/2024-16:37	04/10/2025-16:37	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		10/25/2024-16:28	04/10/2025-16:28	
Chambers, Rhonda	NEF(10-25-2024 03:30:23 PM) Waiver/Waiver	Filing		10/25/2024-15:59	04/10/2025-15:59	
Chambers, Rhonda	Waiver/Waiver	Filing		10/25/2024-15:30	04/10/2025-15:30	
Portfolio Recovery Associates, Llc	NEF(10-24-2024 12:53:19 PM) Order/Consent Order	Filing		10/24/2024-12:53	04/10/2025-12:53	
Portfolio Recovery Associates, Llc	Order/Consent Order	Order		10/24/2024-12:53	04/10/2025-12:53	
Portfolio Recovery Associates, Llc	NEF(10-23-2024 03:24:10 PM) Order/Order Cover Sheet \$25....	Filing		10/23/2024-15:47	04/10/2025-15:47	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		10/23/2024-15:24	04/10/2025-15:24	
Portfolio Recovery Associates, Llc	NEF(10-22-2024 05:01:01 PM) Notice/Other	Filing		10/23/2024-09:21	04/10/2025-09:21	
Portfolio Recovery Associates, Llc	Notice/Other	Filing		10/22/2024-17:01	04/10/2025-17:01	
Portfolio Recovery Associates, Llc	NEF(10-21-2024 06:01:02 PM) Motion/Other	Filing		10/22/2024-09:13	04/10/2025-09:13	
Portfolio Recovery Associates, Llc	Motion/Other/Allow witness to appear via alternative means	Motion		10/21/2024-18:01	03/19/2025-18:01	
Portfolio Recovery Associates, Llc	NEF(10-04-2024 04:42:50 PM) Order/Order Cover Sheet \$25....	Filing		10/04/2024-16:49	04/10/2025-16:49	

Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		10/04/2024-16:42	04/10/2025-16:42	
Portfolio Recovery Associates, Llc	NEF(10-04-2024 12:56:21 PM) Memo/Memo in Opposition	Filing		10/04/2024-13:12	04/10/2025-13:12	
Portfolio Recovery Associates, Llc	Memo/Memo in Opposition	Filing		10/04/2024-12:56	04/10/2025-12:56	  
Portfolio Recovery Associates, Llc	NEF(10-03-2024 12:09:30 PM) Memo/Memo in Opposition	Filing		10/03/2024-12:11	04/10/2025-12:11	
Portfolio Recovery Associates, Llc	Memo/Memo in Opposition	Filing		10/03/2024-12:09	04/10/2025-12:09	 
Grassi, David Anthony Jr.	10/28/2024_JT_Roster/Notice of Case Roster Publication Sent	Action		09/26/2024-16:58	04/10/2025-16:58	
Tillman, Jesse M. III	10/28/2024_JT_Roster/Notice of Case Roster Publication Sent	Action		09/26/2024-16:58	04/10/2025-16:58	
Cantrell, John R Jr.	10/28/2024_JT_Roster/Notice of Case Roster Publication Sent	Action		09/26/2024-16:58	04/10/2025-16:58	
Portfolio Recovery Associates, Llc	NEF(09-24-2024 10:36:31 AM) Order/Electronic Form 4	Filing		09/24/2024-10:36	04/10/2025-10:36	
Portfolio Recovery Associates, Llc	Order/Electronic Form 4/Motion for Discovery (GRANTED)	Order		09/24/2024-10:36	04/10/2025-10:36	
Cantrell, John R Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Cantrell, John R Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Cantrell, John R Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Cantrell, John R Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Grassi, David Anthony Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Grassi, David Anthony Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Grassi, David Anthony Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Grassi, David Anthony Jr.	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Tillman, Jesse M. III	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Tillman, Jesse M. III	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Tillman, Jesse M. III	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Tillman, Jesse M. III	9/16/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		09/04/2024-10:11	04/10/2025-10:11	
Portfolio Recovery Associates, Llc	NEF(08-23-2024 01:33:29 PM) Motion/Sanctions	Filing		08/23/2024-14:11	04/10/2025-14:11	
Portfolio Recovery Associates, Llc	Motion/Sanctions	Motion		08/23/2024-13:33	09/17/2024-13:33	   
Portfolio Recovery	NEF(08-05-2024 02:51:24 PM) Order/Other	Filing		08/05/2024-14:51	04/10/2025-14:51	

Associates, Llc						
Portfolio Recovery Associates, Llc	Order/Other/Deposition/Hearing	Order		08/05/2024-14:51	04/10/2025-14:51	
Portfolio Recovery Associates, Llc	NEF(07-25-2024 05:23:29 PM) Order/Order Cover Sheet \$25....	Filing		07/26/2024-09:40	04/10/2025-09:40	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		07/25/2024-17:23	04/10/2025-17:23	
Chambers, Rhonda	NEF(07-23-2024 01:09:30 PM) Memo/Memo in Support	Filing		07/23/2024-14:04	04/10/2025-14:04	
Chambers, Rhonda	Memo/Memo in Support	Filing		07/23/2024-13:09	04/10/2025-13:09	 
Chambers, Rhonda	NEF(07-23-2024 07:31:21 AM) Memo/Memo in Opposition	Filing		07/23/2024-10:18	04/10/2025-10:18	
Chambers, Rhonda	Memo/Memo in Opposition	Filing		07/23/2024-07:31	04/10/2025-07:31	  
Portfolio Recovery Associates, Llc	NEF(07-19-2024 04:16:13 PM) Memo/Memo in Opposition	Filing		07/19/2024-16:20	04/10/2025-16:20	
Portfolio Recovery Associates, Llc	Memo/Memo in Opposition	Filing		07/19/2024-16:16	04/10/2025-16:16	
Tillman, Jesse M. III	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Tillman, Jesse M. III	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Tillman, Jesse M. III	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Tillman, Jesse M. III	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Cantrell, John R Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Cantrell, John R Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Cantrell, John R Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Cantrell, John R Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Grassi, David Anthony Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Grassi, David Anthony Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Grassi, David Anthony Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Grassi, David Anthony Jr.	7/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		07/08/2024-14:45	04/10/2025-14:45	
Chambers, Rhonda	NEF(06-18-2024 11:50:53 AM) Order/Protection from Court ...	Filing		06/18/2024-11:51	04/10/2025-11:51	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		06/18/2024-11:50	04/10/2025-11:50	
Chambers, Rhonda	NEF(06-17-2024 09:06:26 PM) Proposed Order/Protection fr...	Filing		06/18/2024-09:14	04/10/2025-09:14	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		06/17/2024-21:06	04/10/2025-21:06	
Chambers, Rhonda	NEF(05-14-2024 04:10:35 PM) Order/Continuance	Filing		05/14/2024-16:10	04/10/2025-16:10	
Chambers, Rhonda	Order/Continuance	Order		05/14/2024-16:10	04/10/2025-16:10	
Chambers, Rhonda	NEF(05-13-2024 04:05:58 PM) Motion/Continuance	Filing		05/13/2024-16:17	04/10/2025-16:17	

Chambers, Rhonda	Motion/Continuance	Motion		05/13/2024-16:05	04/10/2025-16:05	
Portfolio Recovery Associates, Llc	NEF(05-10-2024 05:09:19 PM) Memo/Memo in Support	Filing		05/13/2024-09:45	04/10/2025-09:45	
Portfolio Recovery Associates, Llc	NEF(05-10-2024 04:57:25 PM) Motion/Summary Judgment	Filing		05/13/2024-09:15	04/10/2025-09:15	
Portfolio Recovery Associates, Llc	Memo/Memo in Support	Filing		05/10/2024-17:09	04/10/2025-17:09	   
Portfolio Recovery Associates, Llc	Motion/Summary Judgment	Motion		05/10/2024-16:57	09/17/2024-16:57	
Grassi, David Anthony Jr.	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Grassi, David Anthony Jr.	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Grassi, David Anthony Jr.	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Cantrell, John R Jr.	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Cantrell, John R Jr.	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Cantrell, John R Jr.	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Tillman, Jesse M. III	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Tillman, Jesse M. III	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Tillman, Jesse M. III	5/20/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/07/2024-15:04	04/10/2025-15:04	
Portfolio Recovery Associates, Llc	NEF(03-20-2024 03:57:41 PM) Order/Continuance	Filing		03/20/2024-15:57	04/10/2025-15:57	
Portfolio Recovery Associates, Llc	Order/Continuance	Order		03/20/2024-15:57	04/10/2025-15:57	
Portfolio Recovery Associates, Llc	NEF(03-20-2024 03:55:30 PM) Order/Substitution Of Counse...	Filing		03/20/2024-15:55	04/10/2025-15:55	
Portfolio Recovery Associates, Llc	Order/Substitution Of Counsel	Order		03/20/2024-15:55	04/10/2025-15:55	
Portfolio Recovery Associates, Llc	NEF(03-18-2024 09:59:42 PM) Motion/Continuance	Filing		03/19/2024-09:31	04/10/2025-09:31	
Portfolio Recovery Associates, Llc	NEF(03-18-2024 09:48:20 PM) Motion/Substitute Counsel by...	Filing		03/19/2024-09:27	04/10/2025-09:27	
Portfolio Recovery Associates, Llc	Motion/Continuance	Motion		03/18/2024-21:59	04/10/2025-21:59	
Portfolio Recovery Associates, Llc	Motion/Substitute Counsel by Consent	Motion		03/18/2024-21:48	03/20/2024-21:48	
Portfolio Recovery	Decline to Sign:Order/Substitution Of Counsel	Filing		03/18/2024-13:22	04/10/2025-13:22	

Associates, Llc						
Portfolio Recovery Associates, Llc	Decline to Sign:Order/Continuance	Filing		03/18/2024-13:19	04/10/2025-13:19	
Portfolio Recovery Associates, Llc	NEF(03-15-2024 07:34:19 PM) Motion/Summary Judgment	Filing		03/18/2024-10:34	04/10/2025-10:34	
Chambers, Rhonda	NEF(03-15-2024 09:54:17 PM) Motion/Summary Judgment	Filing		03/18/2024-10:11	04/10/2025-10:11	
Chambers, Rhonda	Motion/Summary Judgment	Motion		03/15/2024-21:54	09/17/2024-21:54	   
Portfolio Recovery Associates, Llc	Motion/Summary Judgment	Motion		03/15/2024-19:34	07/23/2024-19:34	
Portfolio Recovery Associates, Llc	Memo/Memo in Support	Filing		03/15/2024-19:34	04/10/2025-19:34	   
Portfolio Recovery Associates, Llc	NEF(03-15-2024 10:35:42 AM) Motion/Continuance	Filing		03/15/2024-10:42	04/10/2025-10:42	
Portfolio Recovery Associates, Llc	NEF(03-15-2024 10:30:31 AM) Motion/Substitution of Couns...	Filing		03/15/2024-10:40	04/10/2025-10:40	
Portfolio Recovery Associates, Llc	Motion/Continuance	Motion		03/15/2024-10:35	04/10/2025-10:35	
Portfolio Recovery Associates, Llc	Motion/Substitution of Counsel	Motion		03/15/2024-10:30	03/20/2024-10:30	
Portfolio Recovery Associates, Llc	NEF(03-13-2024 06:08:42 PM) Notice/Notice of Appearance	Filing		03/13/2024-18:09	04/10/2025-18:09	
Portfolio Recovery Associates, Llc	Notice/Notice of Appearance	Filing		03/13/2024-18:08	04/10/2025-18:08	
Portfolio Recovery Associates, Llc	NEF(03-12-2024 02:25:26 PM) Motion/Relieve As Counsel	Filing		03/12/2024-14:38	04/10/2025-14:38	
Portfolio Recovery Associates, Llc	Motion/Relieve As Counsel	Motion		03/12/2024-14:25	04/30/2024-14:25	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		03/12/2024-14:25	04/10/2025-14:25	
Cantrell, John R Jr.	3/25/2024_JT_Roster/Notice of Case Roster Publication Sent	Action		02/23/2024-15:02	04/10/2025-15:02	
Brown, Joseph Ernest	3/25/2024_JT_Roster/Notice of Case Roster Publication Sent	Action		02/23/2024-15:02	04/10/2025-15:02	
Portfolio Recovery Associates, Llc	NEF(02-22-2024 01:13:30 PM) Response	Filing		02/22/2024-13:19	04/10/2025-13:19	
Portfolio Recovery	Response	Filing		02/22/2024-13:13	04/10/2025-13:13	

Associates, Llc						
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		02/22/2024-13:13	04/10/2025-13:13	
Chambers, Rhonda	NEF(02-09-2024 11:58:38 PM) Motion/Sanctions	Filing		02/12/2024-09:29	04/10/2025-09:29	
Chambers, Rhonda	Motion/Sanctions	Motion		02/09/2024-23:58	07/24/2024-23:58	
Portfolio Recovery Associates, Llc	NEF(01-30-2024 02:52:32 PM) Order/Electronic Form 4	Filing		01/30/2024-14:52	04/10/2025-14:52	
Portfolio Recovery Associates, Llc	Order/Electronic Form 4/Motion to Stay (DENIED)	Order		01/30/2024-14:52	04/10/2025-14:52	
Brown, Joseph Ernest	1/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		01/08/2024-15:43	04/10/2025-15:43	
Cantrell, John R Jr.	1/22/2024_MOTHEA_Roster/Notice of Motions Roster Publication	Action		01/08/2024-15:43	04/10/2025-15:43	
Chambers, Rhonda	NEF(11-14-2023 10:24:41 AM) Order/Protection from Court ...	Filing		11/14/2023-10:24	04/10/2025-10:24	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		11/14/2023-10:24	04/10/2025-10:24	
Chambers, Rhonda	NEF(11-13-2023 05:16:12 PM) Proposed Order/Protection fr...	Filing		11/14/2023-09:12	04/10/2025-09:12	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		11/13/2023-17:16	04/10/2025-17:16	
Portfolio Recovery Associates, Llc	NEF(10-27-2023 04:00:22 PM) Motion/Stay	Filing		10/27/2023-16:21	04/10/2025-16:21	
Portfolio Recovery Associates, Llc	Motion/Stay	Motion		10/27/2023-16:00	10/27/2023-16:00	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		10/27/2023-16:00	04/10/2025-16:00	
Portfolio Recovery Associates, Llc	Decline to Sign:Order/Stay	Filing		10/27/2023-15:46	04/10/2025-15:46	
Portfolio Recovery Associates, Llc	NEF(10-27-2023 12:05:40 PM) Motion/Stay	Filing		10/27/2023-12:47	04/10/2025-12:47	
Portfolio Recovery Associates, Llc	Motion/Stay	Motion		10/27/2023-12:05	01/30/2024-12:05	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		10/27/2023-12:05	04/10/2025-12:05	
Portfolio Recovery Associates, Llc	NEF(07-25-2023 11:23:57 AM) Order/Protection from Court ...	Filing		07/25/2023-11:24	04/10/2025-11:24	
Portfolio Recovery Associates, Llc	Order/Protection from Court Appearance	Order		07/25/2023-11:23	04/10/2025-11:23	
Portfolio Recovery	NEF(07-25-2023 09:36:13 AM) Order/Order Cover Sheet \$25...	Filing		07/25/2023-09:48	04/10/2025-09:48	

Associates, Llc						
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		07/25/2023-09:36	04/10/2025-09:36	
Chambers, Rhonda	NEF(06-15-2023 10:57:11 AM) Order/Sanctions	Filing		06/15/2023-10:57	04/10/2025-10:57	
Chambers, Rhonda	Order/Sanctions (DENIED)/Pay filing fee (GRANTED)	Order		06/15/2023-10:57	04/10/2025-10:57	
Chambers, Rhonda	NEF(05-24-2023 01:06:26 PM) Order/Electronic Form 4	Filing		05/24/2023-13:06	04/10/2025-13:06	
Chambers, Rhonda	Order/Electronic Form 4/Motion Summary Judgment (DENIED)	Order		05/24/2023-13:06	04/10/2025-13:06	
Portfolio Recovery Associates, Llc	NEF(05-22-2023 11:52:31 AM) Response	Filing		05/22/2023-11:54	04/10/2025-11:54	
Portfolio Recovery Associates, Llc	Response	Filing		05/22/2023-11:52	04/10/2025-11:52	 
Chambers, Rhonda	NEF(05-19-2023 11:58:26 AM) Memo/Memo in Support	Filing		05/19/2023-12:05	04/10/2025-12:05	
Chambers, Rhonda	Memo/Memo in Support	Filing		05/19/2023-11:58	04/10/2025-11:58	
Brown, Joseph Ernest	5/22/2023_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/12/2023-15:51	04/10/2025-15:51	
Cantrell, John R Jr.	5/22/2023_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/12/2023-15:51	04/10/2025-15:51	
Portfolio Recovery Associates, Llc	NEF(04-24-2023 11:09:33 AM) Service/Certificate Of Servi...	Filing		04/24/2023-11:29	04/10/2025-11:29	
Portfolio Recovery Associates, Llc	Memo/Memo in Opposition	Filing		04/24/2023-11:09	04/10/2025-11:09	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		04/24/2023-11:09	04/10/2025-11:09	
Chambers, Rhonda	NEF(04-24-2023 09:32:07 AM) Memo/Memo in Support	Filing		04/24/2023-10:02	04/10/2025-10:02	
Chambers, Rhonda	Memo/Memo in Support	Filing		04/24/2023-09:32	04/10/2025-09:32	  
Portfolio Recovery Associates, Llc	NEF(04-13-2023 10:27:57 AM) Letter/Letter	Filing		04/13/2023-10:53	04/10/2025-10:53	
Portfolio Recovery Associates, Llc	Letter/Letter	Filing		04/13/2023-10:27	04/10/2025-10:27	
Boyd, Wesley Evander	4/24/2023_MOTHEA_Roster/Notice of Motions Roster Publication	Action		04/12/2023-15:33	04/10/2025-15:33	
Brown, Joseph Ernest	4/24/2023_MOTHEA_Roster/Notice of Motions Roster Publication	Action		04/12/2023-15:33	04/10/2025-15:33	
Cantrell, John R Jr.	4/24/2023_MOTHEA_Roster/Notice of Motions Roster Publication	Action		04/12/2023-15:33	04/10/2025-15:33	
Portfolio Recovery Associates, Llc	NEF(12-16-2022 10:01:56 AM) Response	Filing		12/16/2022-10:11	04/10/2025-10:11	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		12/16/2022-10:01	04/10/2025-10:01	

Portfolio Recovery Associates, Llc	Response	Filing		12/16/2022-10:01	04/10/2025-10:01	
Chambers, Rhonda	NEF(12-09-2022 03:52:04 PM) Motion/Sanctions	Filing		12/09/2022-15:58	04/10/2025-15:58	
Chambers, Rhonda	Motion/Sanctions	Motion		12/09/2022-15:52	05/24/2023-15:52	
Chambers, Rhonda	NEF(12-06-2022 12:33:03 PM) Order/Continuance	Filing		12/06/2022-12:33	04/10/2025-12:33	
Chambers, Rhonda	Order/Continuance	Order		12/06/2022-12:33	04/10/2025-12:33	
Chambers, Rhonda	NEF(12-06-2022 12:23:13 PM) Order/Protection from Court ...	Filing		12/06/2022-12:23	04/10/2025-12:23	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		12/06/2022-12:23	04/10/2025-12:23	
Chambers, Rhonda	NEF(12-01-2022 12:19:13 PM) Motion/Continuance	Filing		12/01/2022-15:13	04/10/2025-15:13	
Chambers, Rhonda	Motion/Continuance	Motion		12/01/2022-12:19	12/06/2022-12:19	
Chambers, Rhonda	NEF(11-30-2022 06:53:15 PM) Proposed Order/Protection fr...	Filing		12/01/2022-09:24	04/10/2025-09:24	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		11/30/2022-18:53	04/10/2025-18:53	
Portfolio Recovery Associates, Llc	NEF(11-30-2022 02:39:50 PM) Response	Filing		11/30/2022-15:08	04/10/2025-15:08	
Portfolio Recovery Associates, Llc	Response	Filing		11/30/2022-14:39	04/10/2025-14:39	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		11/30/2022-14:39	04/10/2025-14:39	
Chambers, Rhonda	NEF(11-23-2022 04:31:49 PM) Motion/Summary Judgment	Filing		11/23/2022-16:36	04/10/2025-16:36	
Chambers, Rhonda	Motion/Summary Judgment	Motion		11/23/2022-16:31	05/24/2023-16:31	
Cantrell, John R Jr.	12/5/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		11/18/2022-16:53	04/10/2025-16:53	
Brown, Joseph Ernest	12/5/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		11/18/2022-16:53	04/10/2025-16:53	
Boyd, Wesley Evander	12/5/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		11/18/2022-16:53	04/10/2025-16:53	
Chambers, Rhonda	Decline to Sign:Order/Continuance	Filing		11/08/2022-08:28	04/10/2025-08:28	
Chambers, Rhonda	NEF(11-07-2022 04:34:16 PM) Order/Continuance	Filing		11/07/2022-16:34	04/10/2025-16:34	
Chambers, Rhonda	Order/Continuance	Order		11/07/2022-16:34	04/10/2025-16:34	
Chambers, Rhonda	NEF(11-04-2022 03:45:13 PM) Proposed Order/Continuance	Filing		11/04/2022-16:06	04/10/2025-16:06	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		11/04/2022-15:45	04/10/2025-15:45	
Chambers, Rhonda	NEF(11-02-2022 03:19:38 PM) Motion/Continuance	Filing		11/02/2022-15:30	04/10/2025-15:30	
Chambers, Rhonda	Motion/Continuance	Motion		11/02/2022-15:19	11/07/2023-15:19	
Boyd, Wesley Evander	11/7/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		10/06/2022-15:36	04/10/2025-15:36	
Brown, Joseph Ernest	11/7/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		10/06/2022-15:36	04/10/2025-15:36	

Cantrell, John R Jr.	11/7/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		10/06/2022-15:36	04/10/2025-15:36	
Portfolio Recovery Associates, Llc	NEF(08-26-2022 02:59:50 PM) Order/Compel	Filing		08/26/2022-15:00	04/10/2025-15:00	
Portfolio Recovery Associates, Llc	Order/Compel/Motion/Sanctions (DENIED)	Order		08/26/2022-14:59	04/10/2025-14:59	
Cantrell, John R Jr.	7/25/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		06/27/2022-16:46	04/10/2025-16:46	
Brown, Joseph Ernest	7/25/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		06/27/2022-16:46	04/10/2025-16:46	
Boyd, Wesley Evander	7/25/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		06/27/2022-16:46	04/10/2025-16:46	
Chambers, Rhonda	NEF(05-23-2022 08:32:30 PM) Filing/Other	Filing		05/24/2022-10:34	04/10/2025-10:34	
Chambers, Rhonda	Filing/Withdrawal of Motion	Filing		05/23/2022-20:32	04/10/2025-20:32	
Portfolio Recovery Associates, Llc	NEF(05-23-2022 08:59:11 AM) Response	Filing		05/23/2022-10:12	04/10/2025-10:12	
Chambers, Rhonda	NEF(05-22-2022 05:52:50 PM) Motion/Strike	Filing		05/23/2022-10:05	04/10/2025-10:05	
Portfolio Recovery Associates, Llc	Response	Filing		05/23/2022-08:59	04/10/2025-08:59	 
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		05/23/2022-08:59	04/10/2025-08:59	
Chambers, Rhonda	Motion/Strike	Motion		05/22/2022-17:52	05/23/2022-17:52	  
Portfolio Recovery Associates, Llc	NEF(05-20-2022 11:29:42 AM) Letter/Letter	Filing		05/20/2022-11:55	04/10/2025-11:55	
Portfolio Recovery Associates, Llc	NEF(05-20-2022 11:19:23 AM) Memo/Memo in Opposition	Filing		05/20/2022-11:50	04/10/2025-11:50	
Portfolio Recovery Associates, Llc	Letter/Letter	Filing		05/20/2022-11:29	04/10/2025-11:29	  
Portfolio Recovery Associates, Llc	Memo/Memo in Opposition	Filing		05/20/2022-11:19	04/10/2025-11:19	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		05/20/2022-11:19	04/10/2025-11:19	
Chambers, Rhonda	NEF(05-17-2022 11:29:41 PM) Memo/Memo in Support	Filing		05/18/2022-08:24	04/10/2025-08:24	
Chambers, Rhonda	Memo/Memo in Support	Filing		05/17/2022-23:29	04/10/2025-23:29	 
Boyd, Wesley Evander	5/23/2022_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/12/2022-10:44	04/10/2025-10:44	
Cantrell, John R Jr.	5/23/2022_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/12/2022-10:44	04/10/2025-10:44	
Brown, Joseph Ernest	5/23/2022_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/12/2022-10:44	04/10/2025-10:44	

Portfolio Recovery Associates, Llc	NEF(04-28-2022 12:42:58 PM) Order/Protection from Court ...	Filing		04/28/2022-12:43	04/10/2025-12:43	
Portfolio Recovery Associates, Llc	Order/Protection from Court Appearance	Order		04/28/2022-12:42	04/10/2025-12:42	
Portfolio Recovery Associates, Llc	NEF(04-28-2022 09:27:48 AM) Proposed Order/Protection fr...	Filing		04/28/2022-09:55	04/10/2025-09:55	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		04/28/2022-09:27	04/10/2025-09:27	
Portfolio Recovery Associates, Llc	NEF(04-13-2022 04:52:26 PM) Order/Protection from Court ...	Filing		04/13/2022-16:52	04/10/2025-16:52	
Portfolio Recovery Associates, Llc	Order/Protection from Court Appearance	Order		04/13/2022-16:52	04/10/2025-16:52	
Boyd, Wesley Evander	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/12/2022-09:34	04/10/2025-09:34	
Cantrell, John R Jr.	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/12/2022-09:34	04/10/2025-09:34	
Brown, Joseph Ernest	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/12/2022-09:34	04/10/2025-09:34	
Boyd, Wesley Evander	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/12/2022-09:15	04/10/2025-09:15	
Cantrell, John R Jr.	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/12/2022-09:15	04/10/2025-09:15	
Brown, Joseph Ernest	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/12/2022-09:15	04/10/2025-09:15	
Brown, Joseph Ernest	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/06/2022-14:41	04/10/2025-14:41	
Cantrell, John R Jr.	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/06/2022-14:41	04/10/2025-14:41	
Boyd, Wesley Evander	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		04/06/2022-14:41	04/10/2025-14:41	
Portfolio Recovery Associates, Llc	NEF(04-05-2022 12:21:11 PM) Order/Order Cover Sheet \$25....	Filing		04/05/2022-12:32	04/10/2025-12:32	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		04/05/2022-12:21	04/10/2025-12:21	
Chambers, Rhonda	Mail: Return to Sender	Filing		03/29/2022-12:29	04/10/2025-12:29	
Portfolio Recovery Associates, Llc	NEF(03-25-2022 04:26:27 PM) Letter/Letter	Filing		03/25/2022-16:32	04/10/2025-16:32	
Portfolio Recovery Associates, Llc	Letter/Motion Withdrawn	Filing		03/25/2022-16:26	04/10/2025-16:26	
Chambers, Rhonda	NEF(03-21-2022 09:11:43 PM) Notice/Other	Filing		03/22/2022-08:12	04/10/2025-08:12	
Chambers, Rhonda	Notice/Continuance	Filing		03/21/2022-21:11	04/10/2025-21:11	
Boyd, Wesley Evander	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		03/18/2022-15:52	04/10/2025-15:52	

Cantrell, John R Jr.	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		03/18/2022-15:52	04/10/2025-15:52	
Brown, Joseph Ernest	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		03/18/2022-15:52	04/10/2025-15:52	
Brown, Joseph Ernest	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		03/18/2022-15:08	04/10/2025-15:08	
Boyd, Wesley Evander	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		03/18/2022-15:08	04/10/2025-15:08	
Cantrell, John R Jr.	4/18/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		03/18/2022-15:08	04/10/2025-15:08	
Chambers, Rhonda	NEF(03-10-2022 03:57:06 PM) Order/Electronic Form 4	Filing		03/10/2022-15:57	04/10/2025-15:57	
Chambers, Rhonda	Order/Form 4/Summary Judgment (DENIED)	Order		03/10/2022-15:57	04/10/2025-15:57	
Chambers, Rhonda	NEF(02-23-2022 12:00:55 AM) Motion/Compel	Filing		02/23/2022-08:49	04/10/2025-08:49	
Chambers, Rhonda	Motion/Compel	Motion		02/23/2022-00:00	08/26/2022-00:00	   
Chambers, Rhonda	NEF(01-17-2022 10:04:11 PM) Memo/Memo in Support	Filing		01/18/2022-11:57	04/10/2025-11:57	
Chambers, Rhonda	Memo/Memo in Support	Filing		01/17/2022-22:04	04/10/2025-22:04	
Brown, Joseph Ernest	1/18/2022_MOTHEA_Roster/Notice of Motions Roster Publication	Action		01/06/2022-13:10	04/10/2025-13:10	
Cantrell, John R Jr.	1/18/2022_MOTHEA_Roster/Notice of Motions Roster Publication	Action		01/06/2022-13:10	04/10/2025-13:10	
Boyd, Wesley Evander	1/18/2022_MOTHEA_Roster/Notice of Motions Roster Publication	Action		01/06/2022-13:10	04/10/2025-13:10	
Cantrell, John R Jr.	1/4/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		12/16/2021-12:59	04/10/2025-12:59	
Boyd, Wesley Evander	1/4/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		12/16/2021-12:59	04/10/2025-12:59	
Brown, Joseph Ernest	1/4/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		12/16/2021-12:59	04/10/2025-12:59	
Portfolio Recovery Associates, Llc	Decline to Sign:Order/Other	Filing		12/16/2021-10:47	04/10/2025-10:47	
Portfolio Recovery Associates, Llc	NEF(12-15-2021 11:26:18 AM) Order/Scheduling Order	Filing		12/15/2021-11:26	04/10/2025-11:26	
Portfolio Recovery Associates, Llc	Order/Scheduling Order	Order		12/15/2021-11:26	04/10/2025-11:26	
Portfolio Recovery Associates, Llc	NEF(12-14-2021 03:03:19 PM) Order/Order Cover Sheet \$25....	Filing		12/14/2021-15:24	04/10/2025-15:24	
Portfolio Recovery Associates, Llc	Order/Order Cover Sheet \$25.00	Filing		12/14/2021-15:03	04/10/2025-15:03	
Chambers, Rhonda	NEF(12-06-2021 05:26:33 PM) Response	Filing		12/07/2021-08:24	04/10/2025-08:24	
Chambers, Rhonda	Response	Filing		12/06/2021-17:26	04/10/2025-17:26	
Portfolio Recovery Associates, Llc	NEF(12-01-2021 12:22:48 PM) Motion/Other	Filing		12/01/2021-15:02	04/10/2025-15:02	
Portfolio Recovery	Motion to Allow Witness to Attend by Virtual Means	Motion		12/01/2021-12:22	03/25/2022-12:22	

Associates, Llc						
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		12/01/2021-12:22	04/10/2025-12:22	
Brown, Joseph Ernest	1/4/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		11/24/2021-16:19	04/10/2025-16:19	
Cantrell, John R Jr.	1/4/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		11/24/2021-16:19	04/10/2025-16:19	
Boyd, Wesley Evander	1/4/2022_JT_Roster/Notice of Case Roster Publication Sent	Action		11/24/2021-16:19	04/10/2025-16:19	
Chambers, Rhonda	NEF(11-04-2021 03:15:47 PM) Order/Continuance	Filing		11/04/2021-15:25	04/10/2025-15:25	
Chambers, Rhonda	Order/Continuance	Order		11/04/2021-15:15	04/10/2025-15:15	
Chambers, Rhonda	NEF(11-04-2021 01:05:26 PM) Proposed Order/Continuance	Filing		11/04/2021-13:29	04/10/2025-13:29	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		11/04/2021-13:05	04/10/2025-13:05	
Chambers, Rhonda	Decline to Sign:Order/Continuance	Filing		11/04/2021-11:39	04/10/2025-11:39	
Chambers, Rhonda	NEF(11-03-2021 11:32:26 AM) Proposed Order/Continuance	Filing		11/03/2021-11:53	04/10/2025-11:53	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		11/03/2021-11:32	04/10/2025-11:32	
Portfolio Recovery Associates, Llc	NEF(10-27-2021 03:56:53 PM) Response	Filing		10/27/2021-16:36	04/10/2025-16:36	
Portfolio Recovery Associates, Llc	Response	Filing		10/27/2021-15:56	04/10/2025-15:56	   
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		10/27/2021-15:56	04/10/2025-15:56	
Boyd, Wesley Evander	11/8/2021_MOTHEA_Roster/Notice of Motions Roster Publication	Action		10/26/2021-10:48	04/10/2025-10:48	
Cantrell, John R Jr.	11/8/2021_MOTHEA_Roster/Notice of Motions Roster Publication	Action		10/26/2021-10:48	04/10/2025-10:48	
Brown, Joseph Ernest	11/8/2021_MOTHEA_Roster/Notice of Motions Roster Publication	Action		10/26/2021-10:48	04/10/2025-10:48	
Portfolio Recovery Associates, Llc	Decline to Sign:Order/Other	Filing		10/13/2021-16:41	04/10/2025-16:41	
Portfolio Recovery Associates, Llc	NEF(10-08-2021 03:41:30 PM) Order/Electronic Form 4	Filing		10/08/2021-15:42	04/10/2025-15:42	
Portfolio Recovery Associates, Llc	Order/Electronic Form 4	Order		10/08/2021-15:41	04/10/2025-15:41	
Chambers, Rhonda	NEF(10-04-2021 04:36:24 PM) Motion/Other	Filing		10/04/2021-16:53	04/10/2025-16:53	
Chambers, Rhonda	Motion/First Omibus	Motion		10/04/2021-16:36	10/08/2021-16:36	 
Chambers, Rhonda	NEF(10-01-2021 06:01:04 PM) Motion/Summary Judgment	Filing		10/04/2021-09:31	04/10/2025-09:31	
Chambers, Rhonda	Motion/Summary Judgment	Motion		10/01/2021-18:01	03/10/2022-18:01	  
Chambers, Rhonda	NEF(09-24-2021 10:30:48 AM) Response	Filing		09/24/2021-10:36	04/10/2025-10:36	

Chambers, Rhonda	Response	Filing		09/24/2021-10:30	04/10/2025-10:30	
Brown, Joseph Ernest	10/18/2021_JT_Roster/Notice of Case Roster Publication Sent	Action		09/24/2021-09:58	04/10/2025-09:58	
Boyd, Wesley Evander	10/18/2021_JT_Roster/Notice of Case Roster Publication Sent	Action		09/24/2021-09:58	04/10/2025-09:58	
Cantrell, John R Jr.	10/18/2021_JT_Roster/Notice of Case Roster Publication Sent	Action		09/24/2021-09:58	04/10/2025-09:58	
Portfolio Recovery Associates, Llc	NEF(09-14-2021 03:28:38 PM) Motion/Other	Filing		09/14/2021-15:46	04/10/2025-15:46	
Portfolio Recovery Associates, Llc	Motion/Other	Motion		09/14/2021-15:28	10/08/2021-15:28	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		09/14/2021-15:28	04/10/2025-15:28	
Cantrell, John R Jr.	10/18/2021_JT_Roster/Notice of Case Roster Publication Sent	Action		09/10/2021-15:56	04/10/2025-15:56	
Boyd, Wesley Evander	10/18/2021_JT_Roster/Notice of Case Roster Publication Sent	Action		09/10/2021-15:56	04/10/2025-15:56	
Brown, Joseph Ernest	10/18/2021_JT_Roster/Notice of Case Roster Publication Sent	Action		09/10/2021-15:56	04/10/2025-15:56	
Portfolio Recovery Associates, Llc	Judgment/Judgment	Judgment		04/15/2021-11:34	04/10/2025-11:34	
Chambers, Rhonda	Judgment/Judgment	Judgment		04/15/2021-11:34	04/10/2025-11:34	
Brown, Joseph Ernest	3/29/2021_SCH_Roster/Notice of Case Roster Publication Sent	Action		03/01/2021-16:58	04/10/2025-16:58	
Cantrell, John R Jr.	3/29/2021_SCH_Roster/Notice of Case Roster Publication Sent	Action		03/01/2021-16:58	04/10/2025-16:58	
Boyd, Wesley Evander	3/29/2021_SCH_Roster/Notice of Case Roster Publication Sent	Action		03/01/2021-16:58	04/10/2025-16:58	
Portfolio Recovery Associates, Llc	File #4	Filing		01/28/2021-12:31	04/10/2025-12:31	
Portfolio Recovery Associates, Llc	File #3	Filing		01/28/2021-12:30	04/10/2025-12:30	
Portfolio Recovery Associates, Llc	File #2	Filing		01/28/2021-12:27	04/10/2025-12:27	
Portfolio Recovery Associates, Llc	File #1	Filing		01/28/2021-12:25	04/10/2025-12:25	
Portfolio Recovery Associates, Llc	Order/Referred to Master or Special Referee	Order		10/16/2019-10:46	04/10/2025-10:46	
Chambers, Rhonda	NEF(07-24-2019 10:53:02 AM) Order/Protection from Court ...	Filing		07/24/2019-10:53	04/10/2025-10:53	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		07/24/2019-10:53	04/10/2025-10:53	
Chambers, Rhonda	NEF(07-23-2019 04:32:20 PM) Order/Order Cover Sheet \$25....	Filing		07/24/2019-09:53	04/10/2025-09:53	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		07/23/2019-16:32	04/10/2025-16:32	

Portfolio Recovery Associates, Llc	Filing/Case File	Filing		07/09/2019-11:30	04/10/2025-11:30	
Chambers, Rhonda	NEF(05-03-2019 01:09:48 PM) Order/Protection from Court ...	Filing		05/03/2019-13:10	04/10/2025-13:10	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		05/03/2019-13:09	04/10/2025-13:09	
Chambers, Rhonda	NEF(05-02-2019 08:50:34 PM) Order/Order Cover Sheet \$25....	Filing		05/03/2019-10:04	04/10/2025-10:04	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		05/02/2019-20:50	04/10/2025-20:50	
Chambers, Rhonda	NEF(03-01-2019 04:48:35 PM) Order/Protection from Court ...	Filing		03/01/2019-16:48	04/10/2025-16:48	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		03/01/2019-16:48	04/10/2025-16:48	
Chambers, Rhonda	NEF(03-01-2019 01:47:19 PM) Proposed Order/Protection fr...	Filing		03/01/2019-15:45	04/10/2025-15:45	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		03/01/2019-13:47	04/10/2025-13:47	
Chambers, Rhonda	NEF(12-04-2018 11:41:34 AM) Order/Protection from Court ...	Filing		12/04/2018-11:41	04/10/2025-11:41	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		12/04/2018-11:41	04/10/2025-11:41	
Chambers, Rhonda	NEF(12-03-2018 12:30:36 PM) Order/Order Cover Sheet \$25....	Filing		12/03/2018-14:09	04/10/2025-14:09	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		12/03/2018-12:30	04/10/2025-12:30	
Chambers, Rhonda	NEF(10-26-2018 04:50:21 PM) Order/Protection from Court ...	Filing		10/26/2018-16:50	04/10/2025-16:50	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		10/26/2018-16:50	04/10/2025-16:50	
Chambers, Rhonda	NEF(10-24-2018 11:43:12 PM) Proposed Order/Protection fr...	Filing		10/25/2018-12:00	04/10/2025-12:00	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		10/24/2018-23:43	04/10/2025-23:43	
Chambers, Rhonda	NEF(09-20-2018 06:14:21 PM) Order/Protection from Court ...	Filing		09/20/2018-18:14	04/10/2025-18:14	
Chambers, Rhonda	Order/Protection from Court Appearance	Order		09/20/2018-18:14	04/10/2025-18:14	
Chambers, Rhonda	NEF(09-10-2018 09:28:30 PM) Proposed Order/Protection fr...	Filing		09/17/2018-12:48	04/10/2025-12:48	
Chambers, Rhonda	Order/Order Cover Sheet \$25.00	Filing		09/10/2018-21:28	04/10/2025-21:28	
Portfolio Recovery Associates, Llc	Consent Order to Transfer Case to the Court of Common Pleas	Filing		03/28/2018-13:41	04/10/2025-13:41	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		03/07/2018-15:09	04/10/2025-15:09	
Portfolio Recovery Associates, Llc	Motion for case to be removed to the court of common pleas	Motion		03/07/2018-15:08	03/07/2018-15:08	
Portfolio Recovery Associates, Llc	Response to Def Moton for Summary Judgement	Filing		03/07/2018-14:58	04/10/2025-14:58	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		03/07/2018-11:11	04/10/2025-11:11	
Chambers, Rhonda	Response to Defendant's Motion For Summary Judgement	Filing		03/07/2018-11:05	04/10/2025-11:05	
Portfolio Recovery	Notice/Notice of Hearing	Filing		03/07/2018-10:53	04/10/2025-10:53	

Associates, Llc						
Chambers, Rhonda	Service/Certificate Of Service	Filing		02/05/2018-16:23	04/10/2025-16:23	
Chambers, Rhonda	Motion for Summary Judgment	Motion		02/05/2018-16:22	02/05/2018-16:22	 
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		01/12/2018-16:31	04/10/2025-16:31	
Portfolio Recovery Associates, Llc	Motion to Dismiss Defendants Counterclaims	Motion		01/12/2018-16:30	01/12/2018-16:30	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		01/12/2018-16:25	04/10/2025-16:25	
Portfolio Recovery Associates, Llc	Motion for Summary Judgment and memo in support	Motion		01/12/2018-16:25	01/12/2018-16:25	
Brown, Joseph Ernest	9/11/2017_NJT_Roster/Notice of Case Roster Publication Sent	Action		09/07/2017-18:34	04/10/2025-18:34	
Cantrell, John R Jr.	9/11/2017_NJT_Roster/Notice of Case Roster Publication Sent	Action		09/07/2017-18:34	04/10/2025-18:34	
Boyd, Wesley Evander	9/11/2017_NJT_Roster/Notice of Case Roster Publication Sent	Action		09/07/2017-18:34	04/10/2025-18:34	
Boyd, Wesley Evander	9/11/2017_NJT_Roster/Notice of Case Roster Publication Sent	Action		08/31/2017-18:45	04/10/2025-18:45	
Cantrell, John R Jr.	9/11/2017_NJT_Roster/Notice of Case Roster Publication Sent	Action		08/31/2017-18:45	04/10/2025-18:45	
Brown, Joseph Ernest	9/11/2017_NJT_Roster/Notice of Case Roster Publication Sent	Action		08/31/2017-18:45	04/10/2025-18:45	
Portfolio Recovery Associates, Llc	Scheduling Order	Order		08/28/2017-13:16	04/10/2025-13:16	
U.S. Bank N.A.	Service/Certificate Of Service	Filing		08/08/2017-09:32	04/10/2025-09:32	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		08/08/2017-09:32	04/10/2025-09:32	
Portfolio Recovery Associates, Llc	Reply/Reply to Counterclaim	Filing		08/08/2017-09:31	04/10/2025-09:31	
U.S. Bank N.A.	Reply/Reply to Counterclaim	Filing		08/08/2017-09:31	04/10/2025-09:31	
Portfolio Recovery Associates, Llc	Order/Other	Order		08/02/2017-14:30	04/10/2025-14:30	
Chambers, Rhonda	Service/Certificate Of Service	Filing		07/28/2017-16:40	04/10/2025-16:40	
Chambers, Rhonda	Affidavit in Support of Defendant's Objection to Plaintiff's	Filing		07/28/2017-16:39	04/10/2025-16:39	
Chambers, Rhonda	Service/Certificate Of Service	Filing		07/28/2017-16:39	04/10/2025-16:39	
Chambers, Rhonda	Objection to Plaintiff's Motion for Summary Judgment	Filing		07/28/2017-16:38	04/10/2025-16:38	
Chambers, Rhonda	Service/Certificate Of Service	Filing		07/28/2017-16:35	04/10/2025-16:35	
Chambers, Rhonda	Notice/Notice of Hearing	Filing		07/28/2017-16:34	04/10/2025-16:34	

Chambers, Rhonda	Amended Answer and Counterclaim	Filing		07/24/2017-11:14	04/10/2025-11:14	
Chambers, Rhonda	Service/Certificate Of Service	Filing		07/24/2017-11:13	04/10/2025-11:13	
Chambers, Rhonda	Motion to Amend Answer	Motion		07/24/2017-11:13	07/24/2017-11:13	
Portfolio Recovery Associates, Llc	Notice/Notice of Hearing	Filing		06/22/2017-08:42	04/10/2025-08:42	
Portfolio Recovery Associates, Llc	ADR/Proof of ADR	Action		06/20/2017-10:52	06/20/2017-10:52	 
Boyd, Wesley Evander	6/5/2017_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/25/2017-10:26	04/10/2025-10:26	
Brown, Joseph Ernest	6/5/2017_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/25/2017-10:26	04/10/2025-10:26	
Cantrell, John R Jr.	6/5/2017_MOTHEA_Roster/Notice of Motions Roster Publication	Action		05/25/2017-10:26	04/10/2025-10:26	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		05/12/2017-09:52	04/10/2025-09:52	
U.S. Bank N.A.	Service/Certificate Of Service	Filing		05/12/2017-09:52	04/10/2025-09:52	
Portfolio Recovery Associates, Llc	Motion/Summary Judgment	Motion		05/12/2017-09:52	10/16/2019-09:52	
Portfolio Recovery Associates, Llc	Order Granting Plaintiff's Request to Attend Telephonically	Filing		03/24/2017-11:39	04/10/2025-11:39	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		03/24/2017-11:39	04/10/2025-11:39	
Portfolio Recovery Associates, Llc	Motion for Plaintiff to Attend Telephonically	Filing		03/24/2017-11:38	04/10/2025-11:38	
Portfolio Recovery Associates, Llc	ADR/Notice of ADR	Action		02/01/2017-11:47	05/21/2021-11:47	
Portfolio Recovery Associates, Llc	Archived Document	Filing		11/03/2016-00:00	04/10/2025-00:00	
Portfolio Recovery Associates, Llc	Archived Document	Filing		11/03/2016-00:00	04/10/2025-00:00	
Portfolio Recovery Associates, Llc	Order/Form 4	Order		10/19/2016-13:16	04/10/2025-13:16	
Portfolio Recovery Associates, Llc	Affidavit/Affidavit of Carolyn Surtin	Filing		10/12/2016-16:45	04/10/2025-16:45	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		09/12/2016-09:41	04/10/2025-09:41	
Portfolio Recovery	Notice/Notice of Hearing	Filing		09/12/2016-09:41	04/10/2025-09:41	

Associates, Llc						
Portfolio Recovery Associates, Llc	Memo/Memo	Filing		06/27/2016-13:46	04/10/2025-13:46	
Portfolio Recovery Associates, Llc	Order/Referred to Master	Order		06/11/2015-10:58	04/10/2025-10:58	
Chambers, Rhonda	Order for Order of Reference	Filing		06/10/2015-16:20	04/10/2025-16:20	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		06/10/2015-10:58	04/10/2025-10:58	
Portfolio Recovery Associates, Llc	Motion for OOR	Filing		06/10/2015-10:58	04/10/2025-10:58	
Portfolio Recovery Associates, Llc	Notice/Notice of Hearing	Filing		05/06/2015-10:22	04/10/2025-10:22	
Portfolio Recovery Associates, Llc	Notice/Notice of Appearance	Filing		05/04/2015-10:26	04/10/2025-10:26	
Coldiron, Sarah Marie	Roster/Notice of Motions Roster Publication Sent	Action		04/28/2015-16:08	04/10/2025-16:08	
Chambers, Rhonda	Roster/Notice of Motions Roster Publication Sent	Action		04/28/2015-16:08	04/10/2025-16:08	
Portfolio Recovery Associates, Llc	ADR/Alternative Dispute Resolution (Workflow)	Action		04/13/2015-11:33	02/01/2017-11:33	
Portfolio Recovery Associates, Llc	Service/Certificate Of Service	Filing		03/09/2015-12:51	04/10/2025-12:51	
Portfolio Recovery Associates, Llc	Motion/Judgment on the Pleadings	Motion		03/09/2015-12:50	06/11/2015-12:50	
Chambers, Rhonda	Answer/Answer	Filing		10/27/2014-11:18	04/10/2025-11:18	
Chambers, Rhonda	Copy of Answer.	Filing		10/20/2014-14:40	04/10/2025-14:40	
Chambers, Rhonda	Service/Affidavit Of Service	Filing		09/25/2014-14:18	04/10/2025-14:18	
Portfolio Recovery Associates, Llc	Filing/Scanned Case File	Filing		09/16/2014-11:01	04/10/2025-11:01	
Portfolio Recovery Associates, Llc	Summons & Complaint	Filing		09/15/2014-11:22	04/10/2025-11:22	
Portfolio Recovery Associates, Llc	Affidavit/Affidavit of	Filing		09/15/2014-09:26	04/10/2025-09:26	

EXHIBIT 2

STATE OF SOUTH CAROLINA

COUNTY OF BERKELY

PORTFOLIO RECOVERY ASSOCIATES,
LLC,

Plaintiff,

v.

RHONDA CHAMBERS,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO. 2014-CP-08-02072

ORDER

This case was tried before the Court on September 3-5, 2025, in which the Plaintiff (“PRA”) was represented by Jesse M. Tillman, III, and the Defendant (“Chambers”) was represented by John R. Cantrell, Jr.

PROCEDURAL HISTORY

PRA commenced this action in 2014 to collect on a purported unpaid credit account. Chambers initially answered in 2014. Years later, on July 24, 2017, Chambers filed an amended answer in which she asserted counterclaims against PRA for violation of the South Carolina Consumer Protection Code. This matter, which has been pending for nearly a decade, seems to have been exceptionally litigious. Although not taking any depositions, Chambers filed five separate motions for summary judgment—among many other motions and requests for sanctions. The history of litigiousness bears mention because not only did PRA dismiss its claims against Chambers, but on October 25, 2024, Chambers filed a notice of waiver of rights to actual damages. Thus, this matter was being litigated over statutory damages (of \$100 - \$1,000). Chambers objections were numerous, even when she did not actually have any true opposition.

For example. On June 17, 2025, in an attempt to record that PRA was dismissing its claims against Chambers, PRA's counsel filed a Notice of Dismissal with the Clerk of Court. As a result, the Clerk's office reflected that the entire case (including Chamber's Counterclaim) were dismissed. However, because the Notice of Dismissal was not signed by all parties it was ineffective under the Rule. PRA's counsel, when realizing the mistake, filed a Rule 60(b) motion to correct the error and vacate the mistaken dismissal. While Chambers agreed with the need to vacate the erroneous Notice of Dismissal and reinstate the case (so Chambers could pursue her counterclaim), Chambers declined to consent to PRA's motion. Instead, Chambers filed a separate motion to reinstate the case in which she sought sanctions and attorney fees for PRA's mistakenly filed notice of dismissal.

At the commencement of the trial, PRA's Rule 60 motion seeking to reinstate the case was still under advisement by another Circuit Court Judge, and Chamber's request for reinstatement and sanctions had not been set for a hearing. The Court denied Chamber's pending motion and request for sanctions, and on the Court's own Motion Pursuant to Rule 60, the Court vacated the mistakenly filed Notice of Dismissal and reinstated the case so Chambers' counterclaim could proceed to trial.

The Court also heard and ruled on the following pre-trial motions:

Chambers' Motion to Amend Her Counterclaim & PRA's Answer to the Amended Counterclaim

On August 28, 2025, just days before trial, Chambers moved to amend her July 24, 2017, counterclaim against PRA. In response, on September 2, 2025, PRA prophylactically filed a reply to the amended counterclaim in the event Chamber's request to amend was granted. PRA's response to the amended counterclaim set forth 10 separate defenses. Chambers objected to allowing PRA to answer the purported amended complaint.

The Court granted Chamber's motion to amend her Counterclaim. Pursuant to Rule 15(c) SCRCp, the Court finds that the allegations of Chamber's amended counterclaim relate back to the filing of the original counterclaim—July 24, 2017.

The Court also accepted PRA's answer to the amended counterclaim. However, the Court excluded PRA's defense No. 9 which the Court found to be an affirmative defense that had not previously been raised. The Court also ruled, over PRA's objection, that the defenses labeled Nos. 1, 2, 3, 5, and 6 had previously been resolved or disposed of by a summary judgment order issued by Judge McCoy on January 10, 2025. Therefore, the Court found the only defenses that were before the Court at the trial were those labeled 4, 7, 8 and 10. Chief among these is PRA's 10th defense, asserting this action is barred by the statute of limitations.

Chamber's Fifth Motion for Summary Judgment

On the morning of trial Chambers' fifth motion for summary judgment remained pending. The Court denied the motion and proceeded with trial.

TRIAL

At the trial Chambers offered herself as her only witness.¹ PRA offered two witnesses. First, Dwayne Davis of Portfolio Recovery Associates, LLC to whom Chambers objected because although PRA amended its discovery responses to disclose this witness, PRA initially identified a different custodian of records. However, Chambers did not depose any witnesses in this case. The Court allowed this witness to testify over Chamber's objections. Second PRA called Nathan

¹ At the close of her case in chief, and not through a witness, Chambers' counsel attempted to offer into evidence multiple legal briefs and memoranda that had been filed in this case, as well in other cases—including *PRA v. Campney*. The Court declined to accept these documents as evidence, because the arguments of counsel are not evidence.

Abshire of U.S. Bank. Chambers also objected to this witness who was not disclosed until the eve of trial. The Court allowed this witness's testimony to be proffered and took under advisement whether this testimony would be considered. The Court now concludes this witness was not timely identified. Therefore, the Court does not rely on the testimony of Mr. Abshire.

Although the Court admitted the testimony of Mr. Davis over Chamber's objection, the Court also notes that the findings and conclusions made in this Order do not rely on the testimony of Mr. Davis. The findings of fact and conclusions of law set forth herein are based only on the testimony and evidence offered by or through Chambers.

FINDINGS OF FACT

1. The Court finds that PRA and Chambers are properly before the Court, that this Court has jurisdiction over this matter, that all parties have been properly designated, and there is no question as to joinder or non-joinder of parties.

2. Chambers admitted in her Amende Answer that she entered into a credit agreement with U.S. Bank in which she was extended credit by U.S. Bank and also admitted that she defaulted on this agreement. (Amended Answer ¶ 2).

3. Chambers received a letter from U.S. Bank mailed on or about October 5, 2013, in which she was informed that an immediate response was required to stop the charge off of her credit card account and stating that the last payment received by her occurred on March 6, 2013. The letter also stated that the correspondence was Chambers's last opportunity to speak with U.S. Bank to discuss payment options prior to the account being charged off and reported to credit reporting agencies. The letter provided Chambers with the name of the creditor (U.S. Bank), its telephone number, the account number of the debt owed, the amount of the debt owed, and the date by which payment must be made to avoid the charge off of her account.

4. U.S. Bank charged off Chambers's account in November of 2013.
5. The final account statement which was sent to Chambers' address in November 2013, indicated the full balance of the account was charged off. This statement was offered into evidence by Chambers and admitted as Defendant's Exhibit 2.
6. PRA purchased the ability to collect Chambers's debt to U.S. Bank in November of 2013 and was designated by U.S. Bank as its assignee as to the ability to collect the debt owed by Chambers to U.S. Bank.
7. PRA filed its complaint against Chambers to collect the debt on September 14, 2014, alleging breach of contract and pursuant to the breach that Chambers owed PRA \$6,918.89. This action also included a cause of action for an account stated in the amount owed of \$6,079.30.
8. Chambers's answer to PRA's complaint was filed with the court on October 27, 2014.
9. On July 24, 2017, Chambers moved to amend her answer to PRA's complaint and filed her counterclaim against PRA and her motion was allowed by the Court.
10. Chambers presented no evidence that she was confused or misled by communications from U.S. Bank or PRA.

CONCLUSIONS OF LAW

I. Unconscionability

In her counterclaim, Chambers alleges that PRA acted unconscionably when (1) PRA listed two different amounts owed by Chambers in its complaint and (2) failed to send a notice of right to cure ("NORTC") pursuant to S.C. Code Ann. §§ 37-5-110 and 37-5-111. The Court disagrees.

The South Carolina Consumer Protection Code (“SCCPC”), states that a consumer may bring a cause of action against a party for unconscionable conduct in collecting a consumer debt. *See* S.C. Code Ann. § 37-5-108(5)(c). In determining whether a party’s conduct in collecting a consumer debt was unconscionable the court shall consider whether PRA “used fraudulent, deceptive, or misleading representations in connection with the collection of a consumer credit transaction.” *Id.* False representations include the character, amount, or legal status of any debt. S.C. Code Ann. § 37-5-108 (5)(c)(ii).

Pursuant to the South Carolina Rules of Civil Procedure (“SCRCP”), a party can plead on the alternative. This is not fraudulent or misleading. *See generally* Rule 8(a), SCRCP. Instead, the SCRCP states that “relief in the alternative or of several different types may be demanded.” Rule 8(a), SCRCP.

Here, although PRA identified two different amounts, these were amounts owed within two separate and distinct causes of action. Thus, PRA did not make a false representation of the character, amount, or legal status of Chambers’s debt within its complaint. Rule 8(a), SCRCP; *See also Portfolio Recovery Associates, LLC v. Campney*, 414 S.C. 36, 54, 892 S.E.2d 321, 330 (Ct. App. 2023) (explaining that Portfolio Recovery Associates, LLC did not make any misrepresentations when they stated that Chambers owed two different amounts because both amounts correlated with separate theories of recovery.).

In addition, it appears from the amended complaint that Chambers’ is also alleging that a letter sent October 20, 2014, from the law firm Fredrick Hanna & Associates, P.C. (“Hanna”) also forms the basis of some claimed unconscionability by PRA. This letter (which was offered at trial as Defendant’s Exhibit 3.5) was sent *after* the commencement of this lawsuit, and in the reference line identifies the case title, case number and contains the phrase “Balance: \$7,068.89.” although

not amount is referenced or discussed in the body of the letter. Ostensibly, because this amount is different than the amount set out in PRA's complaint Chambers now claims this discrepancy is proof of unconscionability in violation of § 37-5-108. It is not.

It is important to note that Chambers' initial "answer" to PRA's lawsuit was sent on October 13, 2014, in the form of a letter addressed to Hanna—the lawyer's who filed the suit on behalf of PRA. (Def. Ex. 6)². Chamber's "answer" stated "I do realize that I owe the debt and want to make every effort to pay it off." It continues: "I want to start out the new year of 2015 paying all my creditors back some money each month until I can get my debt paid off." Finally, the letter closes "I look forward to seeing what your offer is on the monthly payments." (Def. Ex. 6).

It is in this context that Hanna sent the October 20, 2014, letter. It begins: "We received your Answer" (*i.e.*, Chamber's October 13 letter). It continues: "We would appreciate the opportunity to discuss your case in further detail. Please contact us to explore a settlement." (Def. Ex. 3.5) (emphasis added).

Chambers claims this settlement letter was unconscionable because under Section 37-5-108(5)(c)(i) it constitutes a fraudulent, deceptive or misleading representation of the amount. However, this letter makes no "demand" for any amount. Chambers presented no compelling evidence or testimony that she was deceived or misled by this representation. Further, under Rule 408, SCRE, settlement communications are inadmissible for the purpose of proving the purported amount of a claim. Therefore, the Court finds that Chamber's has failed to carry her burden to prove that PRA's acts or omissions were unconscionable. Therefore, the Court finds in favor of PRA on Chambers's counterclaim for violation of § 37-5-108.

² This letter was also filed with the Clerk of Court on October 27, 2014 as Chamber's "Answer" to PRA's complaint.

II. Failure of Notice of Right to Cure

Additionally, Chambers alleges that there was a failure of NORTC pursuant to S.C. Code Ann. §§ 37-5-110 and 37-5-111 of SCCPC. Although this was not clearly delineated in Chamber's complaint as separate cause of action, Chambers presented it as such during the trial and specifically argued the statute of limitations for such a claim was three years. However, on this claim the Court finds in favor of PRA and against Chambers for the following reasons: (1) the SCCPC does not provide for a cause of action for failure of NORTC, (2) even if there were such a cause of action, the statute of limitations is two years, and (3) even if there were such a cause of action, and even if the Court accepted Chambers' assertion that the applicable statute of limitations was three years, the Court still finds Chambers' claim is time barred.

A. Not Cause of Action for Failure of NORTC

Here, Chamber's claims that she is entitled to pursue a claim to collect statutory damages and/or attorney fees because PRA failed to provide the required NORTC. However, unlike other sections of the SCCPC, the sections concerning NORTC do not provide that the consumer has a cause of action for the failure of this requirement. *See*, S.C. Code Ann § 37-5-110; S.C. Code Ann § 37-5-111 (both concerning NORTC and neither stating the consumer has a cause of action for their violation); *compare with* S.C. Code Ann. § 37-5-108(2) (addressing a prohibition on unconscionable conduct and expressly stating "the consumer has a **cause of action** to recover damages and [statutory damages] from the person violating this section."). Similarly, S.C. Code 37-5-202(a) provides an extensive list of all the subsections of the SCCPC for which the legislature explicitly states "the consumer has a **cause of action.**" (emphasis added). However, conspicuously

absent from this list of sections which provide a consumer with a cause of action are Sections 37-5-110 & 111, which concern NORTC and which Chambers now claims were violated.

When reading and interpreting statutes, courts should analyze the statute as a whole. *Anderson v. S.C. Election Comm'n*, 397 S.C. 551, 556 725 S.E.2d 704 (2012). Thus, separate sections of a statute do not exist in a vacuum. See *Synovus Bank v. S.C. Dep't of Revenue*, 444 S.C. 30, 37, 906 S.E.2d 85 (Ct. App. 2024). All words in a statute should be given their plain and ordinary meaning. *Id.* Further, the canon of “‘expressio unius est exclusio alterius’ or ‘inclusio unius est exclusio alterius’ holds that ‘to express or include one thing implies the exclusion of another, or of the alternative.’” *Hodges v. Rainey*, 341 S.C. 79, 87, 533 S.E.2d 578 (2000) (quoting Black’s Law Dictionary, 7th ed. 1999). Thus, where the legislature includes a term in one section of a statute but not in the other “implies it should not be read into the other.” *State v. Leopard*, 349 S.C. 467, 472-73. 563 S.E.2d 342 (Ct. App. 2002). Subsequently, the court cannot add the term to a section of a statute by its own volition. See *State v. Johnson*, 396 S.C. 424, 429, 721 S.E.2d 786 (Ct. App. 2012).

Therefore, the Court finds that there is no support in the plain language of the SCCPC to support Chambers’ ability to assert a stand-alone cause of action for failure of the NORTC under § 37-5-110 and/or § 37-5-111.

Chambers relies extensively on *Portfolio Recovery Associates, LLC v. Campney*, 414 S.C. 36, 48, 892 S.E.2d 321, 330 (Ct. App. 2023). In that case the Supreme Court recognized that Campney (the debtor) had asserted a “counterclaim related to the SCCPC’s right to cure notification.” However, that reference was not in the context of a stand alone cause of action but rather in the context of a claimed set off. See *Id.* 414 S.C. at 53, 892 S.E.2d at 330 (recognizing that the SCCPC contemplates the right of a debtor, who is defending against a claim from a

creditor, to assert violations of the code as set off); *citing* S.C. Code Ann. § 37-5-205 which recognized the ability to assert violations as a “set off against the debtor’s obligation and [which] may be raised as a defense to the suit on the obligation” for the underlying debt.). This case is unlike *Campney* because PRA is not making a claim against Chambers for her obligation on the debt (which was discharged by bankruptcy). While the claimed failure of the NORTC may be pursued as a defense or set off, the statute does not support the ability to pursue it as a stand-alone cause of action. Therefore, the Court finds in favor PRA on Chamber’s claim for the alleged failure of the NORTC³.

B. Two Year Statute of Limitations

Even if there were a separate cause of action for failure of the NORTC under the SCCPC the claim would nonetheless be barred by the two-year statute of limitation. In *Campney*, the Supreme Court explicitly stated that an alleged failure of the NORTC provisions of the SCCPC was subject to a two-year statute of limitation. *Campney*, 414 S.C. at 53; *citing* S.C. Code Ann. § 37-5-202(1). Chambers relied extensively on *Campney* to support many of the arguments made in this case, however, Chambers suggests that the only part of the *Campney* decision that was improperly decided or not applicable here, is the imposition of a two-year statute of limitation. However, even if this Court had the authority to disagree with the Supreme Court on this, it is not inclined to do so.

The statute of limitations commences at the time the “cause of action reasonably ought to have been discovered.” *Prince v. Liberty Life Ins. Co.*, 390 S.C. 166, 169 (Ct. App. 2010) (quoting *Dean v. Ruscon Corp.*, 321 S.C. 360, 363 (1996)). In this case, PRA’s suit to collect the

³ Accordingly, the Court does not need to decide whether PRA sent the NORTC or whether NORTC was required in this case.

full amount of the debt was served on Chambers on September 18, 2014. Assuming, for the sake of argument, that PRA was required to and failed to send a NOTRC, at the very least Chambers knew or should have known of such failure at that time. However, Chambers did not raise this claim until July 24, 2017. Accordingly, this claim (to the extent such a claim exists) is barred by the two-year statute of limitations. S.C. Code Ann. § 37-5-202(1).

C. Three Year Statute of Limitations

Finally, even if the SCCPC recognizes a stand-alone claim for failure of the NOTRC, and even if the applicable statute of limitations were three years (as Chamber's asserts), the Court still finds that claim is time barred.

Chambers is claiming that the creditor failed to send NOTRC prior to accelerating the account and claiming the full balance of the credit card account as due. However, in discovery, Chambers produced a letter dated October 5, 2013, which was sent to her by U.S. Bank. This letter was admitted into evidence through Chambers as Plaintiff's Exhibit 1, and Chamber's admitted receipt of this letter. This letter reflects that U.S. Bank (the predecessor creditor to PRA) was claiming the full balance of the account was owed and charged off.

Accordingly, upon receipt of this letter Chambers knew or should have known that her creditor had accelerated the debt by claiming the full amount was owed. Therefore, to the extent that Chambers claims that NOTRC was required and had not been provided, she was on notice of such a claim in October 2013. As such, even if a three-year statute of limitation were applicable, the time to make this claim would have expired in October 2016.⁴ Therefore, because Chambers

⁴ See *Dean*, 321 SC at 362 (finding the statute of limitations begins when the litigant knew or should have known of the existence of a claim).

did not assert this claim until July 24, 2017, even assuming it was subject to a three-year statute of limitation, the Court still finds Chamber's claim(s) is time-barred.

CONCLUSION

For the reasons set forth above the Court herein finds in favor of PRA and against Chambers on Chambers claims against PRA with all parties to bear their own costs and attorney fees.

END OF ORDER.



Berkeley Common Pleas

Case Caption: Portfolio Recovery Associates, Llc , plaintiff, et al VS Rhonda Chambers

Case Number: 2014CP0802072

Type: Order/Other

So Ordered

s/ T.J. Rode (#2792)

EXHIBIT 3

Certificate of Electronic Notification

Recipients

Justin Novak - Notification transmitted on 11-10-2025 01:15:15 PM.

John Cantrell - Notification transmitted on 11-10-2025 01:15:15 PM.

Jesse Tillman - Notification transmitted on 11-10-2025 01:15:15 PM.

David Grassi - Notification transmitted on 11-10-2025 01:15:15 PM.

Sharonda James - Notification transmitted on 11-10-2025 01:15:15 PM.

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

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A filing has been submitted to the court RE: 2014CP0802072

Official File Stamp: 11-10-2025 01:15:02 PM

Court: CIRCUIT COURT

Common Pleas

Berkeley

Case Caption: Portfolio Recovery Associates, Llc , plaintiff, et al
VS Rhonda Chambers

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

Filed by or on behalf of: Thomas Rode

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

-

The following people were served electronically:

John R Cantrell, Jr. for Rhonda Chambers

Sharonda James for Portfolio Recovery
Associates, Llc

Jesse M. Tillman, III for Portfolio Recovery
Associates, Llc et al

David Anthony Grassi, Jr. for Portfolio Recovery
Associates, Llc et al

Justin Paul Novak

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

James D. Donohoe

EXHIBIT 4

STATE OF SOUTH CAROLINA**COUNTY OF BERKELEY****IN THE COURT OF COMMON PLEAS****CASE NO. 2014-CP-08-2072****PORTFOLIO RECOVERY
ASSOCIATES, LLC,****Plaintiff,****vs.****RHONDA CHAMBERS,****Defendants.****DEFENDANT'S RULE 59(E) MOTION**

The defendant herein (aka Chambers), by and through her undersigned attorney, hereby files this Rule 59(e), SCRCF Motion ("Motion") to alter or amend the court's merits order filed November 10, 2025 ("Order"). This Motion is timely pursuant to Rule 59(e), SCRCF, since notice of entry of the merits Order was received by Defendant on November 10, 2025. Although Defendant only requests that the court alter or amend its merits Order in the ways specifically indicated below, Defendant reserves the right to request, at the appropriate time, appellate review of any of the court's findings of fact or conclusions of law that appear in the November 10, 2025 merits Order. Also, since Defendant has not yet been able to acquire a transcript of the bench trial in this case, which Defendant believes has not yet become available, Defendant reserves the right to make such amendments to this Motion as may become necessary once Defendant is able to acquire a transcript of the bench trial. Relevant sections of the court's Order as discussed below under the headings applicable to corresponding sections of the Order.

Section 37-5-108 Unconscionability

On pages 5-7 of the Order, the court discusses some of Chambers' unconscionability claims, but not all of them. In paragraph 3 of Chambers' Second Amended Counterclaim ("Counterclaim"), Chambers additionally alleges (1) that it was a violation of § 37-5-108 for

PRA to fail to comply with §§ 37-5-110 & 37-5-111, (2) that it was a violation of § 37-5-108 for PRA to claim in paragraph 5 of its Complaint that the NORTC “was sent to the Defendant or is not required,” and (3) that it was a violation of § 37-5-108 for PRA to demand the full accelerated balance due on Chambers’ credit card account before sending the NORTC.

Although on page 5 of its Order, in the first sentence under the heading “**I. Unconscionability**,” the court acknowledges Chambers’ argument that the NORTC failure was also a § 37-5-108 violation, Chambers does not see any language in this section of the Order where the court addresses this claim. Chambers maintains that it is a violation of § 37-5-108(2) for a creditor to fail to send the NORTC required by §§ 37-5-110 & -111 based on the language of § 37-5-108(5), which states “[i]n applying subsection (2), consideration shall be given to each of the following factors, **among others**, as applicable:” (emphasis added). Chambers relies on this catch-all unconscionability language to show that the list of other unconscionable conduct in § 37-5-108 is not exclusive, but rather that the court has discretion to find that other improper debt collection conduct, such as suing a consumer for the full accelerated balance due on a consumer credit card account before sending the statutorily required NORTC, also violates § 37-5-108(2). Chambers therefore respectfully requests that the court actually rule on this claim so that the issue can be preserved for appellate review.

Secondly, Chambers also does not see in this section of the court’s Order where the court addresses Chambers’ other unconscionability argument mentioned above, namely PRA’s claim in paragraph 5 of its Complaint that the NORTC “was sent to the Defendant or is not required.” Chambers believes that this statement also violates § 37-5-108(2), since it is a “false representation” under § 37-5-108(5)(c). The falsity of the representation is apparent since PRA failed to prove that it sent Chambers the required notice and since the *PRA v. Campney* case cited

by the court in its Order specifically ruled multiple times that PRA is required to send a consumer a NORTC before accelerating the debt and suing the consumer. Therefore, even though PRA's claim was stated in the disjunctive, it is still a "false representation" since both of the alternative statements were false. Note also that the list of "false representations" in § 37-5-108(c) is not exclusive, but any false representation, such as the one alleged here, will suffice to find a violation of the statute. Since Chambers is not aware of where the court addressed this argument, Chambers respectfully requests that the court do so in response to this Motion.

Thirdly, Chambers alleged in paragraph 4 of the Counterclaim that each of the three different amounts that PRA alleged were due on the account violated § 37-5-108(5)(c)(i) because those amounts represented the full alleged accelerated balance that PRA believed was due on the account, which were not actually legally due at the time of those false representations, since according to § 37-5-111(1) PRA may not accelerate the balance due on an unsecured consumer credit transaction until 20 days after PRA gives Chambers a NORTC that complies with the SCCPC, which PRA has never done. Chambers also does not see where the court addressed this argument and respectfully requests that the court do so in response to this Motion.

NORTC Failure

The court rules in this section of the Order that there is no separate cause of action for a creditor's failure to send a consumer the statutorily required NORTC. Chambers, at this point,¹ does not remember this issue having been raised by the parties in this case. If the issue was not raised by the parties, then Chambers questions whether it is proper for the court to rule upon this issue (or perhaps non-issue), for which reason Chambers objects to this ruling and respectfully requests that the court clarify whether or not it was proper for the court to make this ruling, and

¹ Chambers reserves the right to amend this argument once a transcript is available from the bench trial, in case her attorney's memory on this issue is incorrect.

alter or amend it if it was improper. It is clear under South Carolina law that it is improper for an appellate court to *sua sponte* rule upon an issue that was not raised to nor ruled upon by the trial court. *Connolly v. People's Life Ins. Co. of SC*, 299 S.C. 348, 384 SE 2d 738 (1989). *Smith v. Phillips*, 318 S.C. 453, 458 SE 2d 427 (1995). However, Chambers is unaware of any South Carolina cases that address this issue at the trial court level. If the issue was not raised by the parties, then the court's deciding it without input from the parties may have resulted in a denial of procedural due process, since the parties were not provided with notice of the issue or an opportunity to be heard on the issue. Chambers may also have been prejudiced if the court *sua sponte* raised an issue that would not have been raised by the plaintiff had the court not raised it. Also, the United States Supreme Court has stated:

“In our adversarial system of adjudication, we follow the principle of party presentation. As this Court stated in *Greenlaw v. United States*, 554 U.S. 237, 128 S.Ct. 2559, 171 L.Ed.2d 399 (2008), ‘in both civil and criminal cases, in the first instance and on appeal ..., we rely on the parties to frame the issues for decision and assign to courts the role of neutral arbiter of matters the parties present.’ *Id.*, at 243, 128 S.Ct. 2559....

In short: ‘[C]ourts are essentially passive instruments of government.’ *United States v. Samuels*, 808 F.2d 1298, 1301 (CA8 1987) (Arnold, J., concurring in denial of reh'g en banc). They ‘do not, or should not, sally forth each day looking for wrongs to right. [They] wait for cases to come to [them], and when [cases arise, courts] normally decide only questions presented by the parties.’ *Ibid.*”

US v. Sineneng-Smith, 140 S. Ct. 1575, 1579 (2020). If the trial court has raised and ruled upon an issue not presented by the parties, then it would appear that it has violated this legal principle.

If for any reason it was proper for the trial court to consider the issue of whether there is no separate cause of action for a NORTC violation, Chambers believes that the court has overlooked some language in the SCCPC that would create such a private right of action. Chambers alleges that it is not necessary for the statute to use the words “cause of action” when

creating a private right of action, but instead the statute merely must provide for such a private right of action, which the SCCPC does for a failure to comply with the NORTC statutes. Chambers respectfully requests that the court consider the language of § 37-5-202(8)², which Chambers raised in her Counterclaim at paragraph 6. As can be seen from that Code subsection, it provides a private right of action to a consumer when a creditor “has violated this title,” namely Title 37 of the South Carolina Code, which is all of the SCCPC. This is the general private right of action that applies to all SCCPC violations, as opposed to the discrete violation sections of 37-5-108 and 37-5-202(1), which only apply to the violations listed in those sections or subsections. Chambers believes it would be absurd for the General Assembly to prohibit certain conduct in the SCCPC without providing a remedy for that violation, which is why the court should not interpret the SCCPC in that fashion, but instead should look to the general statutory remedy for any violation of the SCCPC as can be found in § 37-5-202(8). To interpret the SCCPC in this fashion would also violate the purpose section of the SCCPC, as can be found at § 37-1-102, especially subsections (1) and (2)(d). Such an absurd interpretation of the SCCPC would also contradict the reasoning of the South Carolina Court of Appeals in *PRA v. Campney* where the court stated when addressing PRA’s argument that only an initial creditor and not an assignee creditor had a duty to give a consumer the NORTC:

“(‘[R]egardless of how plain the ordinary meaning of the words in a statute, courts will reject that meaning when to accept it would lead to a result so plainly absurd that it could not have been intended by the General Assembly.’); *id.* (‘If possible, the [c]ourt will construe a statute so as to escape the absurdity and carry the intention [**330] into effect.’). Particularly, no creditor, initial or assignee, would be held liable for violation of the SCCPC’s right to cure notice requirement whenever a charged off debt was assigned because an initial creditor would argue it would have no obligation once all their claims to a debtor’s account were assigned and an assignee would raise the argument PRA raises. Additionally, such a scenario would frustrate the General Assembly’s intent and purpose

² “(8) In an action in which it is found that a creditor has violated this title, the court shall award to the consumer the costs of the action and to his attorneys their reasonable fees. In determining attorney’s fees, the amount of the recovery on behalf of the consumer is not controlling.”

in enacting the SCCPC. See § 37-1-102(1) to (2) (setting forth the policies [*53] of the SCCPC); § 37-1-102(1) (stating the SCCPC must be ‘liberally construed and applied to promote its underlying purposes and policies’). Therefore, we conclude the trial court erred in finding PRA was not required to send a right to cure notice prior to accelerating the debt and reverse the trial court's determination for PRA on Campney's counterclaim regarding the SCCPC's right to cure notice. 8”

Additionally, if the trial court’s Order was correct that the SCCPC provides no private right of action for a NORTC violation, then the Court of Appeal’s holding in *PRA v. Campney* would make no sense, since the Court of Appeals had to at least implicitly, if not explicitly, find that Campney had a private right of action under the NORTC statutes in order to rule in Campney’s favor on the issue of whether PRA had violated those statutes, and then remanding for a finding on consumer setoff damages and attorney fees, none of which make sense without a finding that Campney had a private right of action under her NORTC counterclaim, which has the same basis as Chambers’ NORTC counterclaim.

Moreover, the trial court’s Order finding that PRA was not required to provide Chambers with a NORTC not only contradicts the holding in *PRA v. Campney*, it also contradicts the holding of Judge McCoy in her order filed January 10, 2025 on the parties’ competing summary judgment orders. On page 3 of her order, Judge McCoy held that “[PRA] was required to provide [Chambers] with a right to cure notice pursuant to S.C. Code Ann. § 37-5-110.” Oddly, the trial court relied upon Judge McCoy’s order in the merits Order, at page 3, when ruling on PRA’s amended Reply and certain defenses that the trial court found were barred by Judge McCoy’s order. It is therefore apparent that the trial court rejected PRA’s claim that Judge McCoy’s order was not binding and not the law of the case. However, the trial court is now attempting to overturn Judge McCoy’s holding that PRA was required to provide Chambers with a NORTC, which is inconsistent with the trial court’s prior ruling on the binding effect of Judge

McCoy's order. More importantly, any finding by the trial court that this holding was incorrect also violates South Carolina case law, since one circuit court judge cannot overrule the holding of another circuit court judge in the same case, since that prior ruling constitutes the law of the case. *Bakala v. Bakala*, 352 S.C. 612, 632, 576 S.E.2d 156 (2003), also citing *Charleston County Dept. of Soc. Servs. v. Father*, 317 S.C. 283, 454 S.E.2d 307, 312 (1995). Chambers therefore believes that any holdings by the trial court that contradicted the findings of fact or conclusions of law made by Judge McCoy in her January 10, 2025 are precluded by the law of the case doctrine, for which cause the trial court should alter or amend its Order to be consistent with Judge McCoy's order on such issues as she addressed in her order. On the NORTC issue, Judge McCoy's order only left open for decision by the trial court whether PRA had complied with the NORTC statutes, not whether PRA was legally required to do so, since this issue was decided against PRA by Judge McCoy's order, at page 3.

Three Year Statute of Limitations

On pages 11-12 of the merits Order, the court addresses an issue about whether Chambers' Counterclaim was barred by the 3-year statute of limitations that Chambers alleges was the correct statute of limitations that the court should have applied in this case.³ Like the issue above where the trial court raised another issue that Chambers believes was not raised by the parties, but instead only by the court, Chambers does not remember PRA arguing that the 3-year statute of limitations began to run on October 5, 2013. To the extent that Chambers is correct that PRA did not make this argument, then Chambers incorporates by reference on this issue the same arguments made above under the "no separate cause of action for a NORTC violation" issue that it appears the court may have raised *sua sponte*, based on the memory of

Chambers' counsel and without current access to the trial transcript, which Chambers believes has not yet been produced by the court reporter.

As to the merits of this portion of the court's Order, if it is proper for this argument to be raised in this fashion by the court *sua sponte*, or alternatively if the court finds that it was properly raised by PRA itself, Chambers believes that the court has overlooked the effect of § 37-5-111(1), which makes it illegal under the SCCPC to accelerate the balance due on an unsecured consumer credit transaction until 20 days after an effective NORTC is given to the consumer under §§ 37-5-110 & -111, which was never done by either PRA nor US Bank. Additionally, even if US Bank had attempted to give Chambers a NORTC that complied with the statutes, which Chambers denies, it would not be effective in this case, since Chambers was sued by PRA, not US Bank, and *PRA v. Campney* specifically holds 4 times that PRA, as the assignee creditor that actually sued Chambers, was the party that had the duty to give Chambers the NORTC at least 20 days before accelerating the debt and filing suit against her.⁴ Also, PRA's trial Exhibit 1 does not comply with the requirements of an effective NORTC under §§ 37-5-110 & -111. Chambers therefore respectfully request that the court alter or amend its Order to find that Chambers' Counterclaim would not be time-barred under the 3-year statutes of limitations that Chambers alleges are the proper statutes of limitations that apply to her Counterclaim.

³ Although the court does not do so, the court should probably cite for the record the two statutes that Chambers argued were the correct statutes of limitation that applied to Chambers' Counterclaim, namely § 15-3-530(2) and § 15-3-540(2).

⁴ See pages 51, 52, and 53 of the South Carolina reporter version of the decision and search for the phrase "right to cure notice" where the following quotes will be found: "However, we agree that consumer credit card accounts are subject to the SCCPC and PRA was required to send her a right to cure notice before requiring repayment." "We find PRA was required to send Campney a right to cure notice before accelerating the amount due and filing a lawsuit." "Because we hold the credit transactions are consumer loans and therefore, consumer credit transactions under the SCCPC, we find the trial court erred in determining PRA was not required to send a right to cure notice before suing for the debt." "Therefore, we conclude the trial court erred in finding PRA was not required to send a right to cure notice prior to accelerating the debt and reverse the trial court's determination for PRA on Campney's counterclaim regarding the SCCPC's right to cure notice."

Chambers again reserves the right to request, at the proper time, appellate review of all findings of fact or conclusions of law that the court has issued in its Order, and her failure to do so in this Motion only means that she does not find it to be necessary for the court to clarify or alter or amend its other findings or conclusions, and not that those findings or conclusions are agreed to be correct. Instead, Chambers merely believes that this is not the proper time to challenge other matters that the court has clearly decided.

WHEREFORE, defendant prays this Court for the following relief:

1. That the court make such changes to its Order as Chambers has requested above, or such other changes as the court may find to be appropriate,
2. Upon reconsideration, rule in favor of Chambers regarding such of her Counterclaims as may be appropriate, and
3. For such other and further relief as this Court deems just and proper.

November 20, 2025

Cantrell Legal, PC

By: /s/ John R. Cantrell, Jr.
 Attorney for Defendant
 108 Phillips Ct.
 St. Matthews, SC 29135-8582
 Telephone: (843) 797-2454
 Email: johncantrelljr@gmail.com
 SC Bar # 10309

CERTIFICATE OF SERVICE

This is to certify that all parties of record have been served with the attached Defendant's Rule 59(e) Motion by court issued NEF only to counsel of record for all parties.

Dated this November 20, 2025.

Cantrell Legal, PC

By: /s/ John R. Cantrell, Jr.
 Attorney for Defendant

EXHIBIT 5

Certificate of Electronic Notification

Recipients

Justin Novak - Notification transmitted on 11-21-2025 12:34:36 PM.

John Cantrell - Notification transmitted on 11-21-2025 12:34:36 PM.

Jesse Tillman - Notification transmitted on 11-21-2025 12:34:37 PM.

David Grassi - Notification transmitted on 11-21-2025 12:34:37 PM.

Sharonda James - Notification transmitted on 11-21-2025 12:34:37 PM.

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A filing has been submitted to the court RE: 2014CP0802072

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Court: CIRCUIT COURT

Common Pleas

Berkeley

Case Caption: Portfolio Recovery Associates, Llc , plaintiff, et al
VS Rhonda Chambers

Document(s) Submitted: Motion/Alter and/or Amend

Filed by or on behalf of: John R Cantrell, Jr.

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The following people were served electronically:

John R Cantrell, Jr. for Rhonda Chambers

Sharonda James for Portfolio Recovery
Associates, Llc

Jesse M. Tillman, III for Portfolio Recovery
Associates, Llc et al

David Anthony Grassi, Jr. for Portfolio Recovery
Associates, Llc et al

Justin Paul Novak

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

James D. Donohoe

EXHIBIT 6

STATE OF SOUTH CAROLINA

COUNTY OF BERKELY

PORTFOLIO RECOVERY
ASSOCIATES, LLC,

Plaintiff,

v.

RHONDA CHAMBERS,

Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO. 2014-CP-08-2072

**OPPOSITION TO DEFENDANT’S
RULE 59(e) MOTION**

NOW COMES Portfolio Recovery Associates, LLC (“PRA” or “Plaintiff”), by and through counsel, and hereby files this Opposition to Defendant Rhonda Chambers’ (“Defendant” or “Chambers”) Rule 59(e) Motion. For the reasons stated herein, the Court should deny the motion in its entirety.

ARGUMENT

I. Chambers’ Motion is Untimely

First and foremost, the Court should deny Chambers’ motion because it is untimely. “A motion to alter or amend the judgment **shall be served** not later than 10 days after **receipt** of written notice of entry of the order.” Rule 59(e), SCRCF (emphasis added). Chambers acknowledges receipt of such notice on November 10, 2025. *See* Defendant’s Rule 59(e) Motion, p. 1. However, Chambers filed and served the motion on November 21, 2025. *See id.* and Certificate of Electronic Notification (Nov. 21, 2025). Based on Chambers’ receipt of the Order at issue on November 10, she was obligated to serve her motion by November 20. She did not do so. That alone justifies denying the motion.

Recognizing this problem, Chambers provided the Court with correspondence showing an attempted filing on November 20 at 11:07 PM. This was undoubtedly done in an attempt to claim the motion was timely. Chambers reliance on this rejected filing is unavailing. First, Rule 59(e) does not require filing within 10 days, it requires service within 10 days. Service can be accomplished through various ways, including mail, and the motion need only be filed within five days of service. *See* Rule 5(b)(1) and (d). Filing on November 21 would be timely if Chambers had served the motion on November 20, but she did not. The failure to serve on November 20 is fatal. Chambers attempted reliance on the rejected filing does not establish any reason she could not have timely served the motion.

While there are circumstances where a late filing could be considered timely, this is not one of them. “If a document is rejected by the clerk of court and is therefore untimely, the party may seek appropriate relief from the court upon good cause shown, such as when the clerk of court erroneously rejected a filing or where a rejection was based on improper formatting.” S.C. R. Common Please E-Filing Guidl. 4(d)(2). Here, however, the clerk neither made a mistake nor was there an issue with formatting. Rather, Chambers’ counsel misfiled the motion long after the Court had closed for the day. Even if this constituted “good cause,” it does not resolve the issue because Rule 59(e) requires service within 10 days, not filing. NEF is but one means of accomplishing service and nothing precluded Chambers from placing the motion in the mail on November 20. Such arguments are academic, however, because Chambers has neither moved to have the motion deemed timely served nor otherwise sought appropriate relief as contemplated by E-Filing Guidl. 4(d)(2). PRA objects to any such belated attempts by Chambers to make such a motion or otherwise seek such relief.

II. The Court Ruled Correctly

Even if Chambers' motion was timely, the Court should deny it because the Court ruled correctly. Chambers challenges the Court's ruling on unconscionability in three ways. She first argues the Court should find a violation of section 37-5-108(2) for "suing a consumer for the full accelerated balance due on a consumer credit card account before sending the statutorily required NORTC..." Defendant's Rule 59(e) Motion, p. 2. But as explained below, portions of the SCCPC operate as a sword and portions operate as a shield. The Court properly recognized the NORTC statutes are a shield for which the Legislature did not create a cause of action. Order, pp. 8-9. While the Legislature could have included the NORTC statutes among whose violation creates a private right of action (*see* S.C. Code Ann. § 37-5-202(1)) it did not do so. The Court, therefore, should decline Chambers' invitation to create liability under section 37-5-108(2) when the Legislature declined to create such liability.

Chambers next says:

Chambers also does not see in this section of the court's Order where the court addresses Chambers' other unconscionability argument mentioned above, namely PRA's claim in paragraph 5 of its Compliant that the NORTC "was sent to the Defendant or is not required." Chambers believes that this statement also violates § 37-5-108(2), since it is a "false representation" under § 37-5-108(5)(c). The falsity of the representation is apparent since PRA failed to prove that it sent Chambers the required notice and since the *PRA v. Campney* case cited by the Court in its Order specifically ruled multiple times that PRA is required to send a consumer a NORTC before accelerating the debt and suing the consumer. Therefore, even though PRA's claim was stated in the disjunctive, it is still a "false representation" since both of the alternative statements were false.

Defendant's Rule 59(e) Motion, pp. 2-3. Chambers' argument is flawed for several reasons. First, the failure to plead this language does not impair a creditor's rights. *See* S.C. Code Ann. § 37-5-111(6) ("[B]ut the failure to so plead does not invalidate any action taken by the creditor that is otherwise lawful...").

Second, Chambers contends the statement is false because “PRA failed to prove that it sent Chambers the required notice...” But PRA had no obligation to prove compliance since its claim was dismissed. Rather, Chambers, as the party seeking affirmative relief, had the duty to prove non-compliance. She failed to do so. Chambers only offered her own testimony in support of her case. *See* Order, p. 3. At most, Chambers could testify as to what she *received* but she has no knowledge of what either PRA or U.S. Bank *sent*. As to those what PRA and U.S. Bank did, Chambers sought to exclude PRA from offering any evidence and successfully excluded evidence from U.S. Bank. *See* Order, pp. 3-4.

Third, Chambers’ reliance on statements in *PRA v. Campney* is misplaced as she reads the language out of context. While the Court of Appeals found “PRA was required to send Campney a right to cure notice before accelerating the amount due and filing a lawsuit,” *see Portfolio Recovery Assocs., LLC v. Campney*, 441 S.C. 36, 51, 892 S.E.2d 321, 329 (Ct. App. 2023), it did so with the stated concern that if a debt buyer was not obligated to send a NORTC, “no creditor, initial or assignee, would be held liable for violation of the SCCPC’s right to cure notice requirement whenever a charged off debt was assigned because an initial creditor would argue it would have no obligation once all their claims to a debtor’s account were assigned and an assignee would raise the argument PRA raises.” *Id.* at 52, 892 S.E.2d at 330. The Court of Appeals did not address whether a debt buyer could rely on a NORTC sent by a predecessor in interest, though it did reiterate that “[a]n assignee stands in the shoes of its assignor.” *Id.* at 49, 892 S.E.2d at 328 (quoting *Bank of Am., N.A. v. Draper*, 405 S.C. 214, 220, 746 S.E.2d 478, 481 (Ct. App. 2013)). At a minimum, this suggests a debt buyer like PRA can rely on a NORTC sent by a predecessor, and the statement itself does not identify the sending party. However, the Court need not decide this issue because the Court correctly ruled Chambers’ claim was time-barred.

Finally, even if Chambers had established the “falsity” she claims, the statement still would not be actionable. Generally speaking, in order for a false statement to be actionable for a violation of a consumer protection statute, it needs to be material. As the Hon. David C. Norton explained:

A logical corollary of the least sophisticated consumer test is that false, deceptive, and misleading statements must be material to be actionable. The materiality requirement limits liability under the [Fair Debt Collection Practices Act] to genuinely false or misleading statements that may frustrate a consumer’s ability to intelligently choose his or her response. The Fourth Circuit has explained that in assessing materiality, we are not concerned with mere technical falsehoods which mislead no one.

Smith v. Dynamic Recovery Solutions LLC, 2019 WL 2368460, at *6 (D.S.C. June 5, 2019) (internal citations and quotation marks omitted). In her initial response to the complaint, Chambers stated “I do realize that I owe the debt and want to make every effort to pay it off.” Order, p. 7 (quoting letter answer dated Oct. 13, 2014). Chambers’ own words show her decision was not impacted in any way by any allegation regarding the NORTC in the initial complaint. Therefore, any such statements would not be actionable because they are immaterial.

Chambers last unconscionability argument addresses “paragraph 4 of the Counterclaim that each of the three different amounts that PRA alleged were due on the account violated § 37-5-108(5)(c)(i) because those amounts represented the full alleged accelerated balance...” Defendant’s Rule 59(e) Motion, p. 3. This argument was squarely addressed and rejected by the Court. Relying on *PRA v. Campney*, the Court correctly said PRA could identify two different amounts based on two separate and distinct causes of action. *See* Order, p. 6. The third amount was contained in a settlement letter and therefore was inadmissible. *Id.* at pp. 6-7. The Court therefore correctly ruled on this issue.

Chambers’ next challenges the Court’s ruling that the NORTC statutes do not provide for a separate cause of action. She suggests the Court is improperly raising this issue sua sponte. *See* Defendant’s Rule 59(e) Motion, pp. 3-4. Chambers says “at this point, [she] does not remember

this issue having been raised by the parties in this case.” *Id.* at p. 3. But at a minimum, she did just that in her Fifth Motion for Summary Judgment filed on the eve of trial. Specifically, she asks the Court “[f]ind that [PRA] is liable to Defendant for a violation of S. C. Code Sec. 37-5-110 and 37-5-111 by suing Defendant for the alleged full accelerated balance of the consumer credit card before sending Defendant the required NORTC.” The Court properly ruled on this issue.

Chambers then attempts to argue S.C. Code Ann. § 37-5-202(8) creates a private right of action. *See* Defendant’s Rule 59(e) Motion, p. 5. This interpretation strains too far. The Court’s analysis correctly recognized that only sections 37-5-108(2) and 37-5-202(a) create a cause of action allowing for an affirmative recovery. Order, p. 8. The Court also correctly recognized it cannot read this explicit “cause of action” language into other sections of the SCCPC. *Id.* at pp. 8-9. Chambers argues disallowing recovery under the circumstances would be “absurd” and contrary to *PRA v. Campney*. *See* Defendant’s Rule 59(e) Motion, p. 5. But disallowing recovery is consistent with *PRA v. Campney* since set off was the only potentially viable option due to the statute of limitations. *See* 441 S.C. at 53, 892 S.E.2d at 330 Chambers’ remaining argument show she misapprehends the nature of the SCCPC. Sometimes it is a shield, and sometimes it is a sword. The Court correctly recognized that Ms. Campney was using the SCCPC as a shield in the portion of her claim that survived, where “the claimed failure of the NORTC may be pursued as a defense or set off...” Order, p. 10. But Chambers is only trying to use the SCCPC as a sword since the underlying obligation was discharged in bankruptcy. Such efforts are not supported by the statute under these facts, as the Court correctly ruled. Order, p. 10.

Chambers then argues “the trial court’s Order finding that PRA was not required to provide Chambers with a NORTC not only contradicts the holding in *PRA v. Campney*, it also contradicts the holding of Judge McCoy in her order filed January 10, 2025 on the parties’ competing summary

judgment orders.” Defendant’s Rule 59(e) Motion, p. 6. This contention is wrong for at least three reasons. First, the Order does not “find[] that PRA was not required to provide Chambers with a NORTC...” Rather, it said “the Court does not need to decide whether PRA sent the NORTC or whether NORTC was required in this case.” Order, p. 10 at n.3. This is because the Court correctly found the NORTC statutes do not provide for a private right of action, distinguishing the facts here from *Campney* because set off is not available here. *Id.* at p. 10. Contrary to Chambers’ incorrect contention, the Order is not at odds with *Campney* and, instead, relies on distinct facts not present in *Campney*. More specifically, Ms. Campney was using the SCCPC as a shield because her efforts to use the SCCPC as a sword were time-barred. Chambers is unable to use the SCCPC as a shield because the debt was discharged. She is therefore trying to use it as a sword but as in *PRA v. Campney*, those efforts are time-barred.

Doubling down on her third incorrect contention, Chambers argues:

[T]he trial court is now attempting to overturn Judge McCoy’s holding that PRA was required to provide Chambers with a NORTC, which is inconsistent with the trial court’s prior ruling on the binding effect of Judge McCoy’s order. More importantly, any finding by the trial court that this holding was incorrect also violates South Carolina case law, since one circuit judge cannot overrule the holding of another circuit court judge in the same case, since the prior ruling constitutes the law of the case.

Defendant’s Rule 59(e) Motion, pp. 6-7. But South Carolina law is clear that the denial of summary judgment is not the law of the case and a trial judge is not bound. *See Weil v. Weil*, 299 S.C. 84, 89, 382 S.E.2d 471, 474 (Ct. App. 1989) (“We conclude that a judge deciding a case on the merits is not bound by a prior order of another judge denying summary judgment.”); *Ballenger v. Bowen*, 313 S.C. 476, 477, 443 S.E.2d 379, 380 (1994) (“A denial of a motion for summary judgment decides nothing about the merits of the case, but simply decides the case should proceed to trial. ... The denial of summary judgment does not establish the law of the case...” (citations omitted)).

Finally, Chambers challenges the Court's alternative holding that her claims were barred by the 3-year statute of limitations. Despite asserting her claim was subject to a 3-year statute of limitations, she contends the Court improperly raises this issue on its own. Chambers does not and cannot dispute PRA raised the statute of limitations as a defense. Rather, she says she "does not remember PRA arguing that the 3-year statute of limitations began to run on October 5, 2013." Such a contention is irrelevant because the issue of whether Chambers' claims were time-barred was clearly before Court. As part of considering and ruling on the issue, the Court properly identified the starting point for when the statute of limitations began to run, which is a question of law the Court must decide. *See Menezes v. WL Ross & Co., LLC*, 403 S.C. 522, 530, 744 S.E.2d 178, 182 (2013) ("The question of when a cause of action arises or accrues is a question of law.") (citations omitted); *Brown v. Finger*, 240 S.C. 102, 111, 124 S.E.2d 781, 785 (1962) ("A cause of action accrues at the moment when the plaintiff has a legal right to sue on it.") (citations omitted). Based on the evidence presented, the Court properly determined any cause of action accrued when Chambers' received a letter dated October 5, 2013, since she was on notice that U.S. Bank, PRA's predecessor in interest, was claiming the full amount was owed. There was no error.

CONCLUSION

For the reasons stated herein, the Court should deny the motion in its entirety.

Respectfully submitted,

/s/ David A. Grassi, Jr.
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December 15, 2025
Rock Hill, South Carolina

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served upon all parties to this action on December 15, 2025 via the Clerk of Court's electronic filing system as follows:

John R. Cantrell, Jr.
Cantrell Legal, PC
108 Phillips Ct.
St. Matthews, SC 29135-8582
johncantrelljr@gmail.com
Counsel for Defendant

/s/ David A. Grassi, Jr.
David A. Grassi, Jr.
Frost Echols, LLC
Counsel for Plaintiff

EXHIBIT 7

Certificate of Electronic Notification

Recipients

Justin Novak - Notification transmitted on 12-15-2025 04:45:43 PM.

John Cantrell - Notification transmitted on 12-15-2025 04:45:43 PM.

Jesse Tillman - Notification transmitted on 12-15-2025 04:45:44 PM.

David Grassi - Notification transmitted on 12-15-2025 04:45:44 PM.

Sharonda James - Notification transmitted on 12-15-2025 04:45:44 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

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A filing has been submitted to the court RE: 2014CP0802072

Official File Stamp: 12-15-2025 04:45:30 PM

Court: CIRCUIT COURT

Common Pleas

Berkeley

Case Caption: Portfolio Recovery Associates, Llc , plaintiff, et al
VS Rhonda Chambers

Document(s) Submitted: Response

Filed by or on behalf of: David Anthony Grassi, Jr.

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

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The following people were served electronically:

John R Cantrell, Jr. for Rhonda Chambers

Sharonda James for Portfolio Recovery
Associates, Llc

Jesse M. Tillman, III for Portfolio Recovery
Associates, Llc et al

David Anthony Grassi, Jr. for Portfolio Recovery
Associates, Llc et al

Justin Paul Novak

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

James D. Donohoe

EXHIBIT 8

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Berkeley
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2014CP0802072

Portfolio Recovery Associates, Llc et al
PLAINTIFF(S)

Rhonda Chambers
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☒ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ☐ **ACTION DISMISSED** (CHECK REASON): ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled);
☐ Other
- ☐ **ACTION STRICKEN** (CHECK REASON): ☐ Rule 40(j), SCRCP; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
☐ Other
- ☐ **STAYED DUE TO BANKRUPTCY**
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (CHECK APPLICABLE BOX):
☐ Affirmed; ☐ Reversed; ☐ Remanded;
☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☒ Statement of Judgment by the Court:

The Court issued a final order in this matter on November 10, 2025. Subsequently, on November 21, 2025, Plaintiff filed a motion to alter or amend this order pursuant to Rule 59(e), SCRCP. Assuming without deciding that Plaintiff's Rule 59 motion is timely, upon review of the arguments and memoranda of the parties, and under the standard applicable to Rule 59, Plaintiff's motion is respectfully DENIED.

END OF ORDER.

ORDER INFORMATION

This order ☒ ends ☐ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 12/22/2025 .

James D. Donohoe

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Berkeley Common Pleas

Case Caption: Portfolio Recovery Associates, Llc , plaintiff, et al VS Rhonda Chambers
Case Number: 2014CP0802072
Type: Order/Electronic Form 4

So Ordered

s/ T.J. Rode (#2792)

EXHIBIT 9

Certificate of Electronic Notification

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David Grassi - Notification transmitted on 12-22-2025 01:13:05 PM.

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Official File Stamp: 12-22-2025 01:12:50 PM

Court: CIRCUIT COURT

Common Pleas

Berkeley

Case Caption: Portfolio Recovery Associates, Llc , plaintiff, et al
VS Rhonda Chambers

Document(s) Submitted: Order/Electronic Form 4 Order/Electronic Form 4

Filed by or on behalf of: Thomas Rode

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Associates, Llc

Jesse M. Tillman, III for Portfolio Recovery
Associates, Llc et al

David Anthony Grassi, Jr. for Portfolio Recovery
Associates, Llc et al

Justin Paul Novak

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

James D. Donohoe