

IN THE SOUTH CAROLINA COURT OF APPEALS

Craig L. Peterkin,
Appellant,

v.

Michael Holt d/b/a Liberty Services,
HomeServe USA Repair Management Corp.,
and John Doe,
Defendants,

of which Michael Holt d/b/a Liberty Services
is the Respondent.

Appellate Case No. 2026-001231

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SEP 14 2026

SC Court of Appeals

MOTION FOR EMERGENCY REMEDIATION PENDING APPEAL

Appellant Craig L. Peterkin respectfully moves this Court for emergency relief to remediate unsafe plumbing conditions pending resolution of this appeal and states as follows:

1. Appellant's home has had an exposed hot water line and indoor-outdoor plumbing since January 2020 when Defendant Holt performed unpermitted plumbing work and was stopped by a City of Charleston Stop Work Order.

2. Appellant's water lines have frozen every winter from 2020-2021 through 2025-2026. On January 18, 2025, a rear water line cracked, requiring emergency repairs.

3. From December 1, 2025 through April 1, 2026, Charleston, SC experienced 19 days at or below 32°F with the lowest temperature reaching 19°F.

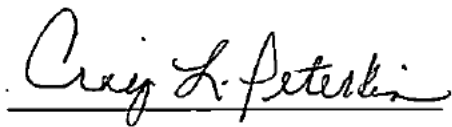
4. Winter 2026-2027 is approaching. Without immediate remediation, Appellant faces a seventh consecutive winter with dangerous conditions that will cause ongoing and foreseeable property damage, frozen pipes, and water damage.

5. The merits of this appeal are strong. Holt admitted at trial he did not obtain a building permit, establishing negligence per se as a matter of law. HomeServe's cross-claims admit Holt caused property damage. The trial court dismissed Appellant's claims without addressing these admissions.

6. Appellant seeks only what is necessary to make the home safe pending appeal: remediation of the exposed plumbing to prevent further freeze damage this winter.

WHEREFORE, Appellant respectfully requests this Court order immediate remediation of the unsafe plumbing conditions at Appellant's property, with costs to be allocated upon final resolution of this appeal.

Respectfully submitted,

A handwritten signature in cursive script, reading "Craig L. Peterkin", written in black ink.

Craig L. Peterkin, Pro Se

1478 Arrow Wind Terrace

Charleston, SC 29414

(843) 754-4208

pete159@comcast.net

Dated: September 14, 2026

CERTIFICATE OF SERVICE

I, Craig L. Peterkin, hereby certify that on September 14, 2026, I served a copy of the following documents upon all counsel of record by depositing same in the United States Mail, first-class postage prepaid:

1. Appellant's Opening Brief
2. Rule 209 Designation of Record on Appeal
3. Motion for Leave to Exceed Page Limitations
4. Motion for Emergency Remediation Pending Appeal

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Addressed as follows:

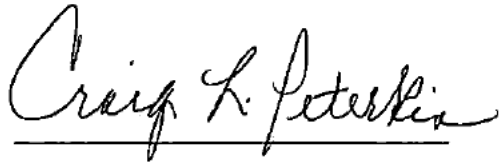
Kerry W. Koon
Kerry W. Koon, Attorney at Law
147 Wappoo Creek Drive, Suite 203
Charleston, South Carolina 29412
Counsel for Defendant Michael Holt d/b/a Liberty Services

Alexander Woods Tesoriero
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Arden Y. Lowndes
Gordon Rees Scully Mansukhani, LLP
677 King Street, Suite 450
Charleston, SC 29403

Counsel for Defendant HomeServe USA Repair Management Corp.

Dated: September 14, 2026

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Craig L. Peterkin, Pro Se

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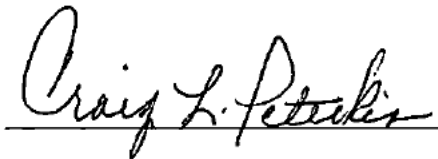
pete159@comcast.net

CERTIFICATION

I, Craig L. Peterkin, hereby certify that this Brief complies with Rule 267(b), SCACR.

This Brief contains 12,719 words and 58 pages, excluding the cover page, table of contents, table of authorities, certificate of service, and this certification page.

Dated: September 14, 2026

A handwritten signature in black ink, reading "Craig L. Peterkin", is written over a horizontal line.

Craig L. Peterkin, Pro Se

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**STATE OF SOUTH CAROLINA
COURT OF APPEALS**

Craig L. Peterkin,
Appellant,

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v.

Appellate Case No. 2026-001231

Michael Holt d/b/a Liberty Services,
HomeServe USA, and John Doe,
Respondents.

Appeal from Charleston County
Court of Common Pleas
Case No. 2023-CP-10-00524

COVER SHEET FOR FILING

The following documents are submitted for filing:

1. Motion for Leave to Exceed Page Limitations
2. Appellant's Opening Brief
3. Rule 209 Designation of Record on Appeal

4. Certification

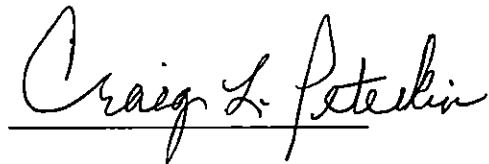
5. Certificate of Service

6. Motion for Emergency Remediation Pending Appeal.

7. Transcripts: Oct 15 2024; March 18, 2025; Jan 6 2026 May 6 2026

Dated: September 14, 2026

Respectfully submitted,

A handwritten signature in black ink, reading "Craig L. Peterkin". The signature is written in a cursive style and is positioned above a horizontal line.

Craig L. Peterkin, Pro Se

Appellant