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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCroy, Circuit Court Judge
Julie J. Armstrong, Charleston County Clerk of Court
Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2025-002014

Danielle C. Brown, Respondent,

v.

Crystal Brown Nwaneri, Appellant.

SUPPLEMENT TO THE RECORD ON APPEAL

Crystal Brown Nwaneri
17293 Oakwood Lodge Lane
Piney Point, MD 20674
(917) 651-8546
Appellant, Pro Se

Logan Steele Davis, Esquire
Graves & Davis, LLC
1730 Central Park Road
Charleston, SC 29412
(843) 805-4649
ldavis@gravesdavis.com
Counsel for Respondent Danielle C. Brown

Stephen Tyler Graves, Esquire
Graves & Davis, LLC
1730 Central Park Road
Charleston, SC 29412
(843) 805-4649
tgraves@gravesdavis.com
Counsel for Respondent Danielle C. Brown

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Crystal Brown <crystal.brown@gmail.com>

Urgent Pro Se Request to File by Email or Fax

Bonnie Campbell <BCampbell@charlestoncounty.org>
To: crystal.brown@gmail.com <crystal.brown@gmail.com>

Thu, Feb 27, 2025 at 11:52 AM

Good morning,

We must have your original motion. Therefore, we can't accept a fax copy. Also, you must include a \$25.00 filing fee and a motion coversheet.

Thanks.

Bonnie L. Campbell
Court Management Supervisor
[100 Broad Street, Ste. 106](#)
[Charleston, S.C. 29401](#)
843-958-5004

From: Randal Evers <REvers@charlestoncounty.org>
Sent: Tuesday, February 25, 2025 2:53 PM
To: Bonnie Campbell <BCampbell@charlestoncounty.org>
Subject: FW: Urgent Pro Se Request to File by Email or Fax

From: Crystal Brown <crystal.brown@gmail.com>
Sent: Tuesday, February 25, 2025 3:09 PM
To: Clerk Of Court <clerkofcourt@charlestoncounty.org>
Subject: Urgent Pro Se Request to File by Email or Fax

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[Quoted text hidden]

----- Forwarded message -----

From: **Logan Davis** <Ldavis@gravesdavis.com>

Date: Fri, Aug 22, 2025 at 11:00 AM

Subject: Re: "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri"

To: Martha S. Dennis <MDennis@charlestoncounty.org>, MIELawClerk <MIELawClerk@charlestoncounty.org>

Cc: MIE CMS <MIE.CMS@charlestoncounty.org>, crystal.brown@gmail.com <crystal.brown@gmail.com>, Tyler Graves <tgraves@gravesdavis.com>

Good afternoon,

Attached for your convenience is a copy of the filed amended memorandum and exhibits in support of the partition being requested in this matter. Thank you.

Sincerely,

Logan S. Davis, Esq.

Partner/Attorney

Graves & Davis, LLC

1730 Central Park Road

Charleston, SC 29412

Phone: (843) 805-4649

Fax: (843) 620-1047

Ldavis@gravesdavis.com

www.gravesdavis.com



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prohibited.

From: Logan Davis <Ldavis@gravesdavis.com>
Date: Tuesday, August 19, 2025 at 12:08 PM
To: Martha S. Dennis <MDennis@charlestoncounty.org>, MIELawClerk <MIELawClerk@charlestoncounty.org>
Cc: MIE CMS <MIE.CMS@charlestoncounty.org>, crystal.brown@gmail.com <crystal.brown@gmail.com>, Tyler Graves <tgraves@gravesdavis.com>
Subject: Re: "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri"

Thank you, Ms. Dennis.

Sincerely,

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



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From: Martha S. Dennis <MDennis@charlestoncounty.org>
Date: Tuesday, August 19, 2025 at 11:03 AM
To: Logan Davis <Ldavis@gravesdavis.com>, MIELawClerk <MIELawClerk@charlestoncounty.org>
Cc: MIE CMS <MIE.CMS@charlestoncounty.org>, crystal.brown@gmail.com <crystal.brown@gmail.com>, Tyler Graves <tgraves@gravesdavis.com>
Subject: RE: "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri"

Good Morning,

Yes, we have you on our calendar on Monday, August 25 at 2:00 in Courtroom 2A at 100 Broad Street.

Many Thanks,

Martha "Marti" Dennis, Esq.
Roster and Scheduling Clerk/Attorney
Charleston County Master-In-Equity's Office
100 Broad Street
Suite 266
Charleston, SC 29401
MDennis@charlestoncounty.org
843-958-5053 direct
843-958-5077 fax

From: Logan Davis <Ldavis@gravesdavis.com>
Sent: Tuesday, August 19, 2025 9:26 AM
To: Martha S. Dennis <MDennis@charlestoncounty.org>; MIELawClerk <MIELawClerk@charlestoncounty.org>
Cc: MIE CMS <MIE.CMS@charlestoncounty.org>; crystal.brown@gmail.com; Tyler Graves <tgraves@gravesdavis.com>
Subject: Re: "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri"

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Good morning, Ms. Dennis,

I wanted to reach out to confirm that our hearing on August 25, 2025 at 2:00 PM is still going forward. I have copied pro-se defendant, Crystal Nwaneri, on this email. Thanks!

Sincerely,

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

signature_1278237898



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From: Martha S. Dennis <MDennis@charlestoncounty.org>

Date: Wednesday, January 29, 2025 at 12:04 PM

To: Logan Davis <Ldavis@gravesdavis.com>, MIELawClerk <MIELawClerk@charlestoncounty.org>

Cc: MIE CMS <MIE.CMS@charlestoncounty.org>, crystal.brown@gmail.com <crystal.brown@gmail.com>, Tyler Graves <tgraves@gravesdavis.com>

Subject: RE: Motion "MIECON-Master/Partition Hearing-Jan. 29 at 3:00" for Case "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri" was added to a Motions Roster for 1/29/2025 at 3:00 PM

Good Afternoon,

I have cc'd Judge Scarborough's law clerk, Lillian Wilkerson, on this response. Please make sure you have e-filed your motion and Judge Scarborough will agree to continue the hearing set for this afternoon. I will reach out in 60 days to discuss setting a new hearing date.

Many Thanks,

Martha "Marti" Dennis, Esq.
Roster and Scheduling Clerk/Attorney
Charleston County Master-In-Equity's Office
100 Broad Street
Suite 266
Charleston, SC 29401
MDennis@charlestoncounty.org
843-958-5053 direct
843-958-5077 fax

-----Original Message-----

From: Logan Davis <Ldavis@gravesdavis.com>

Sent: Wednesday, January 29, 2025 11:18 AM

To: Martha S. Dennis <MDennis@charlestoncounty.org>

Cc: MIE CMS <MIE.CMS@charlestoncounty.org>; crystal.brown@gmail.com; Tyler Graves <tgraves@gravesdavis.com>

Subject: FW: Motion "MIECON-Master/Partition Hearing-Jan. 29 at 3:00" for Case "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri" was added to a Motions Roster for 1/29/2025 at 3:00 PM

CAUTION: This email originated outside of Charleston County. Do not click links or open attachments from unknown senders or suspicious emails. If you are not sure, please contact IT helpdesk.

Marti,

I hope you are doing well. We received correspondence from the pro se Defendant, Crystal Brown Nwaneri, this morning regarding the partition hearing scheduled in this matter for today, January 29, 2025 at 3:00 PM. We have discussed and agreed to consent to a continuance in this matter, of course with the Court's approval, so that Ms. Nwaneri has additional time to review this case and the parties have additional time to try to find resolution without the Court's assistance. We would ask that this hearing is continued to the next roster no earlier than March 1, 2025. Of course, if the parties were able to find resolution before then, we would update the Court. I have attached a copy of the consent motion and order for continuance that we will be e-filing. Can you let us know at your earliest convenience if the Judge will grant the continuance? Thank you for your review of this matter.

Sincerely,

Logan S. Davis, Esq.

Partner/Attorney

Graves & Davis, LLC

1730 Central Park Road

Charleston, SC 29412

Phone: (843) 805-4649

Fax: (843) 620-1047

Ldavis@gravesdavis.com

[https://urldefense.com/v3/_http://www.gravesdavis.com_!!FyuN5H5wA9FHaKde!85ITW-YumzyqSMGuEQagl-oeOWvVxh7rGTw1sQV_acI7cEr1zpJkURhJP-QipEG56EY2NTDFx5D5pHiT3Xi_gUabFw\\$](https://urldefense.com/v3/_http://www.gravesdavis.com_!!FyuN5H5wA9FHaKde!85ITW-YumzyqSMGuEQagl-oeOWvVxh7rGTw1sQV_acI7cEr1zpJkURhJP-QipEG56EY2NTDFx5D5pHiT3Xi_gUabFw$)

PLEASE NOTE: OUR OFFICE HAS RELOCATED TO 1730 CENTRAL PARK ROAD, CHARLESTON, SC 29412

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-----Original Message-----

From: mie.cms@charlestoncounty.org <mie.cms@charlestoncounty.org>

Sent: Tuesday, December 31, 2024 3:07 PM

To: Logan Davis <Ldavis@gravesdavis.com>

Cc: mdennis@charlestoncounty.org

Subject: Motion "MIECON-Master/Partition Hearing-Jan. 29 at 3:00" for Case "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri" was added to a Motions Roster for 1/29/2025 at 3:00 PM

A hearing in the above referenced matter has been scheduled in front of Judge Scarborough on Wednesday, January 29, 2025 in Courtroom 2A at 100 Broad Street. Please refer to the published roster on the Charleston County or SC Judicial websites for more information. Proper notice is your responsibility. If your case is settled or is no longer going forward, please notify Marti at MDennis@charlestoncounty.org and the roster will be marked accordingly. Thank you.

Smokeball Reference V3: 91d90997-2ca3-4417-98dd-a6e210945442_fbace995-5b30-4f78-a5c3-b3017ce15417_4b0fa921-c54a-49fd-92cd-78689cfd341c.

Exhibits to Memorandum in Support of Partition.pdf, Amended Memorandum in Support of Partition.pdf

AUGUST 22-25, 2025 EMAIL CHAIN

From: Logan Davis <Ldavis@gravesdavis.com>
Date: Mon, Aug 25, 2025 at 11:36■AM
Subject: Re: Clarification re: Hearing Scheduled for August 25, 2025
To: MIELawClerk <MIELawClerk@charlestoncounty.org>, Crystal Brown <crystal.brown@gmail.com>
CC: Martha S. Dennis <MDennis@charlestoncounty.org>, Tyler Graves <tgraves@gravesdavis.com>

Thank you for the update, Ms. Wilkerson. Plaintiff and I will be present for the in-person hearing at 2:00 p.m.

Sincerely,

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

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From: MIELawClerk <MIELawClerk@charlestoncounty.org>
Date: Monday, August 25, 2025 at 11:17■AM
To: Crystal Brown <crystal.brown@gmail.com>, Logan Davis <Ldavis@gravesdavis.com>
Cc: Martha S. Dennis <MDennis@charlestoncounty.org>, Tyler Graves <tgraves@gravesdavis.com>
Subject: RE: Clarification re: Hearing Scheduled for August 25, 2025

Good morning,

Upon review of the communications and filings in this case, Judge Scarborough has determined that the Defendant did receive proper notice of the hearing and will proceed with the in-person hearing scheduled today for 2:00 p.m. The Court will not allow for the virtual or telephone participation by either party. Additionally, this Court notes that this hearing was continued from the January 29, 2025 date and that the Defendant was found to be in default in September 2024. Thus, the partition hearing set for 2:00 p.m. today will proceed as previously scheduled.

Thank you very much.

Lillian P. Wilkerson, Esq.
Judicial Law Clerk
Charleston County Master In Equity
100 Broad Street, Suite 266
Charleston, SC 29401
Ph: (843) 958-5075
MIELawClerk@charlestoncounty.org

Dear Ms. Wilkerson and Honorable Court:

I write to clarify the record regarding today's scheduled hearing. Contrary to Plaintiff's misrepresentations below, I have not consented to, nor requested, that the hearing proceed by WebEx or any other virtual platform. Plaintiff's counsel's offer of a WebEx link is procedurally immaterial unless and until the Court orders such an appearance.

My request remains exactly as stated in my prior correspondence: if the Court nevertheless elects to proceed with the hearing over my timely objections, I respectfully request leave to participate by telephone in order to mitigate the prejudice resulting from insufficient and defective notice. This conditional request in no way constitutes a waiver of my objections or consent to the proceeding.

I also preserve my objection to Plaintiff's memorandum in support, which was filed the business day before the hearing, among other improper filings. That submission was untimely and prejudicial and should be stricken from the record.

In light of the hearing scheduled for 2:00 p.m. today, I respectfully request that the Court advise of its position at the earliest possible time so that I may make the necessary logistical arrangements.

Respectfully,

Crystal Brown Nwaneri

Defendant, Pro Se

On Mon, Aug 25, 2025 at 10:11■AM Logan Davis <Ldavis@gravesdavis.com> wrote:
Ms. Wilkerson,

While we stand firm that notice has been effectuated, in an effort to go forward with this hearing, we are open to a virtual hearing. However, if the Court is willing to accommodate Defendant's request to have a virtual hearing, we would respectfully request it to be conducted via WebEx. Of course, we still plan on appearing at Court today unless the Court instructs otherwise.

Further, I wanted to note that Plaintiff also lives out of state; however, she has made accommodations to be here for the hearing.

Thank you all for your time and attention to this matter.

Sincerely,

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

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From: Crystal Brown <crystal.brown@gmail.com>
Date: Monday, August 25, 2025 at 9:46■AM
To: MIELawClerk <MIELawClerk@charlestoncounty.org>
Cc: Logan Davis <ldavis@gravesdavis.com>, Martha S. Dennis <MDennis@charlestoncounty.org>, Tyler Graves <tgraves@gravesdavis.com>
Subject: Re: Urgent: "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri"

Please put forth this Reply to Plaintiff's Response Regarding Notice of Hearing:

Dear Honorable Court:

I write in reply to Plaintiff's August 22 response to my objection regarding insufficient notice of the hearing scheduled for August 25, 2025. Plaintiff's arguments misapply the South Carolina Rules of Civil Procedure and rest on plainly erroneous calculations.

Given the defective notice and the improper late filing, Defendant respectfully requests that the Court advise immediately whether today's 2:00 p.m. hearing will proceed. If the Court nonetheless elects to go forward, Defendant—who resides in Maryland—requests leave to appear by telephone to avoid further prejudice.

I. Plaintiff's Reading of Rule 6 Is Incorrect

Plaintiff contends that because I received the FedEx package on August 15, 2025, I had "ten days' notice" of the August 25 hearing. This reasoning directly contradicts Rule 6(a), SCRCP, which governs the computation of time. The Rule provides:

"In computing any period of time prescribed or allowed by these rules, ... the day of the act, event, or default from which the designated period of time begins to run shall not be included."
Thus, the day of the hearing (August 25) is excluded. Ten days "before" August 25 runs back to August 14, not August 15. Plaintiff's math is off by at least one full day. To suggest otherwise is to ask this Court to disregard the plain language of Rule 6.

Plaintiff further argues that Rule 6(e)'s three-day extension does not apply to commercial carriers such as FedEx. This too is mistaken. Rule 6(e) expressly applies where service is made "by mail." South Carolina courts have recognized that Rule 5(b)(1) permits service "by delivering a copy ... by mail," and that "mail" includes service via carriers such as FedEx and UPS. See *Regions Bank v. Strawn*, 394 S.C. 46, 714 S.E.2d 554 (Ct. App. 2011) (treating FedEx delivery as mail service for purposes of Rules). Plaintiff cites no authority to carve FedEx out of the rule, and indeed the very reason for Rule 6(e)'s three-day cushion is the unavoidable delay built into mail or mail-equivalent service.

Accordingly, Plaintiff was required to mail (or dispatch by FedEx) the notice no later than August 12 so that I would receive it by August 14 at the latest. Instead, counsel did not place the package with FedEx until August 13, guaranteeing that it could not arrive by the Rule 6 deadline.

II. Plaintiff's "Confirmation Email" Is Ineffective

Plaintiff's August 20 email cannot cure the defective service. As Plaintiff admits, service by email is not authorized by Rule 5 absent written consent, which I have not given. This "confirmation" five days later only underscores Plaintiff's awareness that the FedEx notice was late.

III. Plaintiff's Remaining Arguments Are Irrelevant

Plaintiff's assertion that I am "in default" is a red herring. Even if default were entered (which I dispute), due process requires that notice of any hearing be given in compliance with Rule 6. A party in default still has the right to be heard on matters affecting property rights.

Plaintiff's claim that I "actually received" notice is likewise unavailing. The question is not whether I eventually received a package, but whether notice was timely served under the Rules. It was not.

IV. Conclusion

Plaintiff's attempt to justify late service by rewriting the Rules is unpersuasive. Ten days before August 25 is August 14, not August 15. Rule 6(e) applies to service by FedEx. And Plaintiff's own choice to delay dispatch until August 13, and then to use two-day service rather than overnight, ensured that notice would be untimely.

For these reasons, I respectfully renew my request that the Court:

Sustain my objection and find Plaintiff's notice defective under Rule 6;

Strike or continue the August 25 hearing; and

Grant such further relief as this Court deems just and proper.

On Mon, Aug 25, 2025 at 9:38■AM MIELawClerk <MIELawClerk@charlestoncounty.org> wrote:
Good morning,

I will place these correspondences before Judge Scarborough and will be in touch with his response to Defendant's objection to the hearing today. Please let me know if you have any questions or concerns in the meantime.

Lillian P. Wilkerson, Esq.

Judicial Law Clerk

Charleston County Master In Equity

100 Broad Street, Suite 266

Charleston, SC 29401

Ph: (843) 958-5075

MIELawClerk@charlestoncounty.org



Crystal Brown <crystal.brown@gmail.com>

Urgent: "2023CP1006212-Danielle C Brown VS Crystal Brown Nwaneri"

Crystal Brown <crystal.brown@gmail.com>

Mon, Aug 25, 2025 at 1:36 PM

To: MIELawClerk <MIELawClerk@charlestoncounty.org>, MIE CMS <MIE.CMS@charlestoncounty.org>, Martha S. Dennis <MDennis@charlestoncounty.org>

Cc: Logan Davis <ldavis@gravesdavis.com>, Tyler Graves <tgraves@gravesdavis.com>

Bcc: Crystal Brown <crystal.brown@gmail.com>

August 25, 2025

VIA EMAIL ONLY FOR DATE-TIME STAMP

Re: *Brown v. Brown*, Charleston County Court of Common Pleas, Case No. 2023-CP-10-4783
Objection and Preservation of Rights

Your Honor:

I am writing in response to the Court's ruling (below), delivered via email today August 25, 2025, at 11:24 a.m., see attached.

The email order stated that the plaintiff's notice for the August 25 hearing today at 2p.m. was timely, despite my objections, and that the hearing would proceed with in-person appearances only. I respectfully submit this letter, by email for a clear time-stamped record, to object to this ruling and to preserve my rights.

A. Denial of Participation and Violation of Due Process

The Court's decision to deny any request for virtual or phone participation — by Plaintiff per his emails this morning, and myself — effectively prevents me from attending today's hearing. As a pro se defendant residing in Piney Point, Maryland, I am hundreds of miles from the Charleston courthouse. My repeated requests for a reasonable accommodation to appear by phone have been denied.

The Court's refusal to allow me to participate in any way—either physically or remotely—is a violation of my fundamental due process rights. By being barred from the proceeding, I am denied a meaningful opportunity to be heard and to defend my interests. Proceeding under these conditions constitutes a clear error.

B. Preservation of Objections for Appeal

For the record, I formally object to the Court's ruling and to the hearing proceeding today with the court's express order that in-person appearance is required. The court issued this order despite knowing of **plaintiff's contemporaneous representation that she is currently in Piney Point, Maryland, and therefore unable to attend any hearing today in-person**, due largely to Plaintiff's late notice and the court's issuance of an order requiring in-person appearance just 1.5 hours before the scheduled start time.

Should the Court nevertheless go forward with the hearing at 2 p.m., I must expressly object and preserve all rights and defenses for appeal, including but not limited to:

* Violation of Due Process: My due process rights were violated by the denial of meaningful participation.

* Lack of Personal Jurisdiction: I maintain that the Court lacks jurisdiction over my person due to the defective service of the original Complaint. **Service by publication in a local Charleston newspaper is legally insufficient for a pro se defendant living in Maryland.**

* Improper Notice: I continue to object to the untimely filing of the Plaintiff's purported Memorandum in Support, which deprived me of adequate notice time to prepare a response.

I respectfully request that these objections be noted on the record. These and all other objections are not waived in any respect.

Respectfully submitted,

Crystal Brown Nwaneri

Defendant, Pro Se

[Quoted text hidden]

Clarification re- Hearing Scheduled for August 25, 2025.pdf, Ex A 20250815 FedEx signed.pdf, Ex A 20250815 fed ex no sgn required.pdf



GRAVES & DAVIS

Attorneys at Law

LOCATION
1730 Central Park Road
Charleston, SC 29412

ATTORNEYS
Tyler Graves, *Attorney* (SC)
Logan Davis, *Attorney* (SC)
Seth Manaker, *Of Counsel* (SC)

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

September 17, 2025

SENT VIA FEDEX

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

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

Dear Ms. Nwaneri:

Pursuant to the South Carolina Rules of Civil Procedure, enclosed please find a Notice of Hearing, an Order on Partition Hearing filed on September 3, 2025, and a copy of the appraisal of the subject property for the above referenced matter. Of note, the attached appraisal shall be presented to the court at the date of the hearing.

Further, as noted in the Order on Partition Hearing, Defendant must notify the Court and Plaintiff's counsel in writing of Defendant's decision whether or not Defendant wishes to purchase Plaintiff's interest and Defendant's proposed terms of such purchase by September 26, 2025.

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

Sincerely,

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

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

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

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

NOTICE OF HEARING

TO: DEFENDANT CRYSTAL BROWN NWANERI

YOU WILL PLEASE TAKE NOTICE that a hearing in this matter will be held on October 6, 2025 at 1:00 PM before the Honorable Mikell R. Scarborough, Master-In-Equity for Charleston County, at the Charleston County Judicial Center, 100 Broad Street, Suite 266, Charleston, SC 29401.

Respectfully submitted,

GRAVES & DAVIS, LLC

Logan S. Davis, Esq. (S.C. Bar # 104429)
S. Tyler Graves, Esq. (S.C. Bar # 103173)
1730 Central Park Road
Charleston, South Carolina 29412
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ldavis@gravesdavis.com
Attorneys for Plaintiff

January 15, 2025
Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

DANIELLE C. BROWN,

Plaintiff,

v.

CRYSTAL BROWN NWANERI,

Defendant.

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

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

**ORDER
ON PARTITION HEARING**

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

PROCEDURAL HISTORY AND SERVICE

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

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

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

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

FINDINGS OF FACT

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

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

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

CONCLUSIONS OF LAW

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

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED:

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

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

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



Charleston Common Pleas

Case Caption: Danielle C Brown VS Crystal Brown Nwaneri

Case Number: 2023CP1006212

Type: Master/Order/Other

So Ordered

s/Mikell R. Scarborough 3062

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

Due Course Appraisal Co.
PO Box 560
Mt Pleasant, SC 29465-0560
843-568-9784
key@ducourseappraisals.com

09/16/2025

Graves & Davis, LLC as counsel for Danielle Brown
1730 Central Park Rd
Charleston, SC 29412

Re: Property: 8297 Delhi Rd
North Charleston, SC 29406
Owner: Danielle C Brown & Crystal Brown Nwaneri
File No.: BROWN

Opinion of Value: \$ 230,000
Effective Date: 09/11/2025

In accordance with your request, we have appraised the above referenced property. The report of that appraisal is attached.

The purpose of the appraisal is to develop an opinion of market value for the property described in this appraisal report, as improved, in unencumbered fee simple title of ownership.

This report is based on a physical analysis of the site and improvements, a locational analysis of the neighborhood and city, and an economic analysis of the market for properties such as the subject. The appraisal was developed and the report was prepared in accordance with the Uniform Standards of Professional Appraisal Practice.

The opinion of value reported above is as of the stated effective date and is contingent upon the certification and limiting conditions attached.

It has been a pleasure to assist you. Please do not hesitate to contact me or any of my staff if we can be of additional service to you.

Sincerely,



James Key Collins
CR-4789
State: SC Expires: 06/30/2026
key@ducourseappraisals.com



Appraisal Report

8297 Delhi Rd
North Charleston, SC 29406

Due Course Appraisal Co.
843-568-9784
key@ducourseappraisals.com

Appraised Value as of: 09/11/2025
\$ 230,000

FEATURES

Style/Design:	Ranch	Lot Size:	0.28 Acres
Living Area (Sq.Ft.):	1,460	Neighborhood:	Northwood Estates
Total Bedrooms:	3	Total Baths:	2
Year Built:	1971	Effective Age:	35
Condition:	Fair	Date of Report:	09/16/2025

PREPARED FOR

Client: Graves & Davis, LLC as counsel for Danielle Brown
Address: 1730 Central Park Rd
City: Charleston State: SC Zip: 29412
Phone: 843-805-4649 Fax:
E-mail: ldavis@gravesdavis.com

PREPARED BY

James Key Collins
Appraiser's Signature

Name: James Key Collins
Certification or License #: 4799
Expiration Date: 06/30/2026 ST: SC
E-mail: key@ducourseappraisals.com

FILING

Client File #: BROWN Appraiser File #: 25092769

The value opinion expressed above is only valid in conjunction with the attached appraisal report. This value opinion may be subject to Hypothetical Conditions and/or Extraordinary Assumptions as indicated in the body of the report. A true and complete copy of this Summary Appraisal Report contains 21 pages.

EXTERIOR-ONLY RESIDENTIAL APPRAISAL REPORT

SUBJECT PROPERTY IDENTIFICATION

Property Address: 8297 Delhi Rd City: North Charleston
State: SC Zip Code: 29406 County: Charleston
Legal Description of Real Property: Lot 8 Block Cc Section 3, Northwood Estates
Tax Assessor's Parcel #: 485-06-00-026 R.E. Taxes: \$ 2,388 Tax Year: 2024
Special Assessments: \$ 0 Current Owner of Record: Danielle C Brown & Crystal Brown Nwaneri
Occupancy: ☐ Owner ☐ Tenant ☒ Vacant Current Occupant (if occupied): Vacant
Project Type (if applicable): ☐ Planned Unit Development ☐ Condominium ☐ Cooperative ☒ Established Neighborhood
Home Owners' Association Membership Fees (if applicable): \$ 0 ☐ per year ☐ per month
Market Area Name: Northwood Estates Map Reference: 16700 Census Tract: 0031.17

ASSIGNMENT

The purpose of this appraisal is to develop a Current opinion of Market Value (as defined elsewhere in this report).

Property Rights Appraised: ☒ Fee Simple ☐ Leasehold ☐ Leased Fee ☐ Other (describe)

Intended Use: The intended use of this appraisal is to assist the client, as the intended user of this report, in evaluating the subject property for a Partition Action.

Intended User(s) (by name or type): Graves & Davis, LLC as counsel for Danielle Brown & the Charleston County Master-In-Equity Court.

Client: Graves & Davis, LLC as counsel for Danielle Brown Address: 1730 Central Park Rd, Charleston, SC 29412

Appraiser: James Key Collins Address: PO Box 560, Mt Pleasant, SC 29465-0560

MARKET AREA DESCRIPTION

Location: ☐ Urban ☒ Suburban ☐ Rural Built Up: ☒ Over 75% ☐ 25-75% ☐ Under 25%
Growth Rate: ☐ Rapid ☒ Stable ☐ Slow Property Values: ☒ Increasing ☐ Stable ☐ Declining
Demand/Supply: ☐ Shortage ☒ In Balance ☐ Over Supply Marketing Time: ☒ Under 3 Mos. ☐ 3-6 Mos. ☐ Over 6 Mos.
Typical One-Unit Housing Ranges: Price: (\$) Low 200,000 High 450,000 Predominant 325,000
Age: (yrs.) Low 38 High 63 Predominant 51
Present Land Use: One-Unit: 100 % 2-4 Unit: % Multi-Unit: % Comm'l: %
Change in Land Use: ☒ Not Likely ☐ Likely * ☐ Is Changing * * To:

Market Area Comments:

The subjects neighborhood is bounded to the north by University Blvd, to the east by Highway 52, to the south by Greenridge Rd and to the west by the I-26. See Location Map. The typical exposure time for similar homes in the subjects market area is less than 3 months. The definition of exposure time used was taken from the Definitions section of the 2012-2013 version of USPAP. See attached addenda for additional information.

SALE / TRANSFER / LISTING HISTORY OF SUBJECT PROPERTY

My research: ☐ Did ☒ Did not reveal any prior sales or transfers of the subject property for the three years prior to the Effective Date of this appraisal.

Data Source(s): MLS Tax Records

1st Prior Sale / Transfer 2nd Prior Sale / Transfer 3rd Prior Sale / Transfer

Date of Prior Sale / Transfer: 05/07/2022

Price of Prior Sale / Transfer: \$0.00

Source(s) of Prior Sale / Transfer Data: Per MLS & Tax Records

Analysis of sale / transfer history, any current agreements of sale or listing, and listing history (if relevant):

Per CTARMLS records the subject has not been listed for sale within 1 year of the effective date of this appraisal. The subject was transferred in a non-arm's length transaction.

Client: Graves & Davis, LLC as counsel for Client File No.: BROWN

Appraiser File No.: 25092769



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EXTERIOR-ONLY RESIDENTIAL APPRAISAL REPORT

SITE DESCRIPTION

Dimensions: See Tax Map Site Area: 0.28 Acres
 Zoning Classification: R-1 Zoning Description: Single Family Residential
 Zoning Compliance: ☒ Legal ☐ Legal Non-Conforming (Grandfathered) ☐ Illegal ☐ No Zoning Regulations
 Deed Restrictions: Are Covenants, Conditions, & Restrictions (CC&Rs) applicable? ☐ Yes ☒ No ☐ Unknown
 Have the documents been reviewed? ☐ Yes ☐ No ☒ N/A Ground Rent (if applicable) \$ /
 Comments:
 Highest & Best Use, as improved, is the: ☒ Present use, or ☐ Other use (explain)

Characteristics: Topography: Basically Level Size: Typical for Subdivision
 Shape: Rectangular Drainage: Appears Adequate
 View: Similar Homes / Interstate Landscaping: Average
 Notes: Adjacent to Interstate N/A N/A
 Other features: ☒ Inside Lot ☐ Corner Lot ☐ Cul de Sac ☐ Underground Utilities ☐

Utilities:	Public	Other	Provider/Description	Off-site improvements:	Type	Public	Private
Electricity:	☒	☐	Dominion	Street:	Asphalt	☒	☐
Gas:	☒	☐	Dominion	Curb/Gutter:	Concrete	☒	☐
Water:	☒	☐	North Charleston	Sidewalk:	Concrete	☒	☐
Sanitary Sewer:	☒	☐	North Charleston	Alley:	None	☐	☐

Is the property or the improvements located in a FEMA Special Flood Hazard Area? ☐ Yes ☒ No
 FEMA Flood Zone: X FEMA Map #: 45019C0280K FEMA Map Date: 01/29/2021

Site Comments:

The appraiser notes that normal utility and drainage easements have no effect on the value or use of this property. No Apparent easements, encroachments or other adverse conditions were noted at the time of inspection. Final determination on the flood zone is by survey. See addendum

DESCRIPTION OF THE IMPROVEMENTS

General Description: # of Units: 1 ☐ + Accessory Unit # of Stories: 1 Design (Style): Ranch
 Type: ☒ Detached ☐ Attached ☐ Status: ☒ Existing ☐ Proposed ☐ Under Construction
 Actual Age (years): 54 Effective Age (years): 35 Year Built: 1971
 Exterior Description:
 Foundation: Slab Exterior Walls: Brick / Wood Siding
 Roof Surface: Asphalt Shingle Gutters & Downspouts: Gutters
 Window Type(s): Wood Double Hung Storm / Screens: Screens
 Heating System: FWA/Central Cooling System: FWA/Central
 Car Storage: ☐ None ☒ Garage ☐ Carport ☒ Driveway (Surface: Concrete) Total # of Cars: 3
 Livable area above grade contains: 6 Rooms, 3 Bedrooms, 2 Bath(s), and 1,460 Sq.Ft. of GLA

Describe Additional Features and Improvements:

Based on an exterior only inspection the subject property was observed to be built with good quality building materials and to be in fair condition at the time of inspection. Depreciation exists from deferred maintenance, typical wear and typical tear. This appraisal is made based on the assumption that the subjects interior condition is equal to its "Fair" exterior condition (e.g., suffers from deferred maintenance, some interior items need repairs, dated features, worn flooring, etc.,.) See addendum regarding condition scale. Features include: 1 Car Garage, Covered Porch, Patio, Partial Fence, Some Gutters, Etc... The reported room count is based on information found in tax records. No inspection/observation of the subjects interior was completed.

Client: Graves & Davis, LLC as counsel for Client File No.: BROWN Appraiser File No.: 25092769



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EXTERIOR-ONLY RESIDENTIAL APPRAISAL REPORT

SALES COMPARISON APPROACH TO VALUE

For the Sales Comparison Approach, the appraiser selects comparable sales that they consider the best matches to the subject in terms of physical characteristics, physical proximity, and time of sale. The appraiser then makes adjustments to the known sale price of each comparable sale to account for differences that are recognized by the market. For example, if the subject has a single bathroom but a comparable has 2, the comparable's sale price would be reduced by the attributable value given to the extra bathroom based on the market's reaction. Likewise, if a comparable sale has a smaller square footage than the subject, its sale price would be adjusted upward in the same manner. By weighting and reconciling these adjusted sales prices together, an opinion of value for the subject can be determined.

FEATURE	SUBJECT	COMPARABLE SALE # 1	COMPARABLE SALE # 2	COMPARABLE SALE # 3
Address	8297 Delhi Rd North Charleston, SC 29406	8170 Wainwright Rd North Charleston, SC 29406	2952 Nantuckett Ave North Charleston, SC 29420	2529 Otranto Rd North Charleston, SC 29406
Proximity to Subject		0.35 miles SE	0.48 miles SW	0.89 miles NE
Sale Price	\$ N/A	\$ 250,000	\$ 212,000	\$ 310,000
Sale Price / GLA	\$ /Sq.Ft.	\$ 162.34/Sq.Ft.	\$ 170.14/Sq.Ft.	\$ 149.83/Sq.Ft.
Data Source(s)	Inspection	CTARMLS#24030454	CTARMLS#25008054	CTARMLS#25005429
ADJUSTMENT ITEMS	DESCRIPTION	DESCRIPTION +(-) \$ Adjust.	DESCRIPTION +(-) \$ Adjust.	DESCRIPTION +(-) \$ Adjust.
Sales or Financing	N/A	Conven/DOM 8	Cash/DOM 0	Conven/DOM 8
Concessions	N/A	\$0.00	\$3,150	\$9,300
Date of Sale / Time	N/A	01/24/2025	04/10/2025	04/17/2025
Rights Appraised	Fee Simple	Fee Simple	Fee Simple	Fee Simple
Location	NorthwEst./Intersta	Northwood Est.	Colony North	NorthwEst./BanyRd
Site	0.28 Acres	0.31 Acres	0.26 Acres	0.27 Acres
View	Similar Homes	Similar Homes	Similar Homes	Similar Homes
Design (Style)	Ranch	Ranch	Ranch	Ranch
Quality of Construction	Brick/Wood/Good	VinylSiding/AG	WoodSiding/Avg	Brick/Wood/Good
Age	54	49	41	59
Condition	Fair	Fair/Average	Fair	Average
Above Grade	Total Bdrms Baths	Total Bdrms Baths	Total Bdrms Baths	Total Bdrms Baths
Room Count	6 3 2	6 3 2	6 3 2	6 3 2
Gross Living Area	1,460 Sq.Ft.	1,540 Sq.Ft.	1,246 Sq.Ft.	2,069 Sq.Ft.
Basement Total Area	None	None	None	None
Basement Finish Area	None	None	None	None
Functional Utility	Average	Average	Average	Average
Heating / Cooling	FWA/Central	FWA/Central	FWA/Central	FWA/Central
Energy Efficient Items	Typical	Typical	Typical	Typical
Garage / Carport	1 Car Garage	1 Car Garage	1 Car Garage	2 Car Garage
Porch / Patio / Deck	CovPorch/Patio	Stoop	Covered Porch	Covered Porch
Fireplaces	None	1 Fireplace	None	1 Fireplace
Additional Features	Partial Fence	Workshop	Partial Fence	Fence
Std. Kitchen Equipment	Std.Kitch.Equip.	Std.Kitch.Equip.	Std.Kitch.Equip.	Std.Kitch.Equip.
Not Adjustment (Total)		☐ + ☒ - \$ -20,000	☒ + ☐ - \$ 11,700	☐ + ☒ - \$ -73,950
Adjusted Sale Price of Comparables		\$ 230,000	\$ 223,700	\$ 236,050

Comments on the Sales Comparison Approach:

Adjustments of \$50 per square foot were made for differences in GLA. Comp's 1, 2, 4 and 5 were adjusted for differences in site values. The subjects location adjacent to I-26 is considered slightly adverse. The appraiser notes that comp 4 is located in Pepperhill subdivision; Pepperhill is considered a slightly inferior location/subdivision. Comps 1, 3 and 5 were adjusted for differences in condition and/or updating. Comps 1 and 2 received construction quality adjustments for differences in building materials and/or original quality. All other adjustments are considered typical for the area. The sales submitted were considered the best available after thorough research in MLS records.

Appraiser's Indicated Value by the Sales Comparison Approach:

\$ 230,000

Client: Graves & Davis, LLC as counsel for Client File No.: BROWN

Appraiser File No.: 25092769



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EXTERIOR-ONLY RESIDENTIAL APPRAISAL REPORT RECONCILIATION

Final Reconciliation of the Approaches to Value:

Comps 1 and 2 provided the most influence on the appraisers opinion of value. Comps 3 and 4 were also weighted heavily but slightly less than comps 1 and 2. Listing comp 5 was also considered. See Addendum

This appraisal is made ☒ "as is"; ☐ subject to completion per plans and specifications on the basis of a Hypothetical Condition that the improvements have been completed, ☐ subject to the following repairs or alterations on the basis of a Hypothetical Condition that the repairs or alterations have been completed, ☐ subject to the following required inspection(s) based on the Extraordinary Assumption that the following condition or deficiency does not require alteration or repair:

The appraisal is made based on the extraordinary assumption that the subjects interior condition is equal to it's exterior condition.

The appraiser notes that the opinion of value and/or the results of this appraisal could change if the assumption is found to be incorrect.

☒ This report is also subject to other Hypothetical Conditions or Extraordinary Assumptions as specified elsewhere in this report.

ATTACHMENTS

A true and complete copy of this report contains 21 pages, including all exhibits which are considered an integral part of the report. This appraisal report may not be properly understood without reference to the information contained in the complete report.

Attached Exhibits:

- | | | | |
|---|---|--|--|
| ☒ Scope of Work | ☒ Limiting Conditions | ☒ Certifications | ☒ Narrative Addendum |
| ☒ Photograph Addenda | ☒ Sketch Addendum | ☒ Map Addenda | ☐ Flood Addendum |
| ☒ Additional Sales | ☐ Cost Addendum | ☐ Manufactured House Addendum | ☐ Hypothetical Conditions |
| ☒ Extraordinary Assumptions | ☐ | ☐ | ☐ |

OPINION OF VALUE

This Opinion of Value may be subject to other Hypothetical Conditions and / or Extraordinary Assumptions, if so indicated above. Based on the degree of inspection of the subject property as indicated below; the defined Scope of Work for this appraisal assignment; the attached Statement of Assumptions and Limiting Conditions; and the attached Appraiser's Certifications, my (our) Current Opinion of the Market Value (or value range), as defined elsewhere in this report, of the real property that is the subject of this report is: \$ 230,000 , as of: 09/11/2025 which is both the Inspection Date and the Effective Date of this appraisal.

SIGNATURES

APPRAISER

SUPERVISORY APPRAISER (if required)
or CO-APPRAISER (if applicable)

Appraiser Name: James Key Collins
Company: Due Course Appraisal Co.
Phone: 843-568-9784 Fax:
E-mail: key@duecourseappraisals.com
Date of Report (Signature): 09/16/2025
License or Certification #: 4799

Supervisory or
Co-Appraiser Name:

Company:

Phone:

Fax:

E-mail:

Date of Report (Signature):

License or Certification #:

State:

State: SC

Expiration Date of License or Certification: 06/30/2026
Inspection of Subject: ☐ Interior & Exterior ☒ Exterior Only ☐ None
Date of Inspection: 09/11/2025

Expiration Date of License or Certification:
Inspection of Subject: ☐ Interior & Exterior ☐ Exterior Only ☐ None
Date of Inspection:

Client: Graves & Davis, LLC as counsel for Client File No.: BROWN

Appraiser File No.: 25092769



ADDITIONAL COMPARABLE SALES SALES COMPARISON APPROACH TO VALUE

FEATURE	SUBJECT	COMPARABLE SALE # 4	COMPARABLE SALE # 5	COMPARABLE SALE # 6
Address	8297 Delhi Rd North Charleston, SC 29406	3258 Dublin Rd North Charleston, SC 29420	8520 Delhi Rd North Charleston, SC 29406	
Proximity to Subject		1.49 miles S	0.39 miles NE	
Sale Price	\$ N/A	\$ 205,000	\$ 270,000	\$
Sale Price / GLA	\$ /Sq.Ft.	\$ 153.90/Sq.Ft.	\$ 142.03/Sq.Ft.	\$ /Sq.Ft.
Data Source(s)	Inspection	CTARMLS#25021221	CTARMLS#24026811	
ADJUSTMENT ITEMS	DESCRIPTION	DESCRIPTION +(-) \$ Adjust.	DESCRIPTION +(-) \$ Adjust.	DESCRIPTION +(-) \$ Adjust.
Sales or Financing	N/A	Cash/DOM 6	ACTIVE/DOM319	
Concessions	N/A	\$0.00	\$0.00	
Date of Sale / Time	N/A	08/25/2025	ACTIVE	
Rights Appraised	Fee Simple	Fee Simple	Fee Simple	
Location	NorthwdEst./Intersto	Pepperhill +10,000	Northwood Est. -10,000	
Site	0.28 Acres	0.25 Acres	0.34 Acres	
View	Similar Homes	Similar Homes	Similar Homes	
Design (Style)	Ranch	Ranch	Ranch	
Quality of Construction	Brick/Wood/Good	Brick/Good	Brick/Wood/Good	
Age	54	49	58	
Condition	Fair	Fair	Average -27,000	
Above Grade	Total Bdrms Baths	Total Bdrms Baths	Total Bdrms Baths	Total Bdrms Baths
Room Count	6 3 2	6 3 1.1 +3,000	6 3 2	
Gross Living Area	1,460 Sq.Ft.	1,332 Sq.Ft. +6,400	1,001 Sq.Ft. -22,050	3q.Ft.
Basement Total Area	None	None	None	
Basement Finish Area	None	None	None	
Functional Utility	Average	Average	Average	
Heating / Cooling	FWA/Central	FWA/Central	FWA/Central	
Energy Efficient Items	Typical	Typical	Typical	
Garage / Carport	1 Car Garage	None +10,000	1 Car Garage	
Porch / Patio / Deck	CovPrch/Patio	Deck +2,000	Covered Porch +1,000	
Fireplaces	None	None	None	
Additional Features	Partial Fence	Partial Fence	Partial Fence	
Std. Kitchen Equipment	Std.Kitch.Equip.	Std.Kitch.Equip.	Std.Kitch.Equip.	
Net Adjustment (Total)		X+ □- \$ 31,400	□+ X- \$ -58,050	□+ □- \$
Adjusted Sale Price of Comparables		\$ 236,400	\$ 211,950	\$

Comments:

Client: Graves & Davis, LLC as counsel for Daniels Client File No.: BROWN

Appraiser File No.: 25092769



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Supplemental Addendum

Ref: 25092769

Lender/Client	Graves & Davis, LLC as counsel for Danielle Brown						
Property Address	8297 Oaks Rd						
City	North Charleston	County	Charleston	State	SC	Zip Code	29406
Owner	Danielle C Brown & Crystal Brown Nwanne						

• GP Consumer Short Form : Neighborhood - Description

The subject is located in Northwood Estates in the City of North Charleston. Northwood Estates is an established single family detached neighborhood mainly featuring ranch and split level style homes. The neighborhood has relatively easy access to Highway 52, Highway 78, I-526 and I-26. Residents are afforded convenient access to schools, shopping, places of worship, businesses and places of employment.

• GP Consumer Short Form : Neighborhood - Market Conditions

A review of the appraiser's files, a competitive market analysis and an area market survey from the Trident Multiple Listing Service was done for the subject area. Currently there are 6 homes listed for sale in Northwood Estates (active/contingent) and a 11 have sold in the past year per MLS records. Appeal for the area has been good. Stability of the market is considered good. There are no known adverse factors affecting marketability.

Appraisal Reporting Process

The appraisal report presents only summary discussions of the data, reasoning and analysis that were used in the appraisal process to develop the appraiser's opinion of value. Supporting documentation that is not provided within this report concerning data, reasoning and analysis is retained in the appraiser's file. The depth of discussion contained in this report is specific to the needs of the client and for the intended use stated within the report. The appraiser is not responsible for unauthorized use of this report.

Intended Use/Use Of The Appraisal Report

The intended use of this appraisal is to assist the client, as the intended user of this report, in evaluating the subject property for a Partition Action. The intended user of this report is noted on the second page in the Client section. This report was prepared for the exclusive use of the referenced client.

Purpose Of The Assignment

The purpose of this report is to provide an opinion of market value, as defined in the report, for the subject property. The opinion of value stated in this report is in terms of financial arrangements equivalent to cash.

Termite Infestation (Existing Dwellings)

Although there was no evidence of infestation, this does not rule out the possibility of termites. It is recommended that a licensed pest control operator inspect the subject property.

Environmental Disclaimer

The opinion of value is based on the assumption the property is not negatively affected by the existence of hazardous substances or detrimental environmental conditions unless otherwise stated in this report. The appraiser is not an expert in the identification of hazardous substances or detrimental environmental conditions. The appraiser's routine inspection of and inquiries about the subject property did not develop any information that indicated any apparent significant hazardous substances or detrimental environmental conditions which could affect the property negatively unless otherwise stated in this report. It is possible that test and inspections made by a qualified hazardous substance and environmental expert would reveal the existence of hazardous substances or detrimental environmental conditions on or in close proximity to the subject property that would negatively affect its market value.

Data Collection And Inspection Comments

All data contained within this report was obtained and verified through the Multiple Listing Service (MLS) including Tax and Map data, inspection of the subject property and neighborhood, Professional Realtors and Real Estate Agents and/or the appropriate governing agencies.

This report is based on an exterior-only inspection of the subject property. This appraisal is not a home inspection and the appraiser is not acting as a home inspector when preparing this report. The borrower has the right to have the property inspected by a professional home inspector. It is assumed that all mechanical equipment and appliances are operable, that all electrical, plumbing and roof components are operable and/or satisfactory; and there are no structural defects hidden by floor or wall coverings or any other hidden or unapparent conditions of the subject property. The appraiser does not have the expertise to make appropriate inspections and therefore assumes no responsibility for these items.

Digital Photograph and Signature Comments

The photographs provided in this report are digital images. There has been no alterations whatsoever made to these images. When utilized, signatures are digital and approved by the appraiser of the report.

Site Survey and Federal Emergency Management Agency Information (FEMA)

The site dimensions, size, easements, encroachments and flood zone information are subject to a survey. The surveyor is better able to make the final determination regarding flood zone data and their opinion should over rule that of the appraiser. A survey from a licensed professional is recommended to determine the exact location of the subject property.

Final Reconciliation

The Sales Comparison Approach was given the most credence due to the fact it reflects the activity of typical buyers and sellers in the marketplace. The Cost Approach is not applicable when appraising condominiums. Unless otherwise noted in the report, the Income Approach was not utilized due to limited rental data and is not considered applicable. The final opinion of value does not include any personal property unless stated in the report. The final opinion of value is subject to a thorough title examination.

Supplemental Addendum

File # 25062769

Under Order	Graves & Davis, LLC as counsel for Danielle Brown				
Property Address	8297 Dohy Rd				
City	North Charleston	County	Charleston	State	SC
Zip Code	29405				
Owner	Danielle C Brown & Crystal Brown Nwaneri				

Scale of Condition Ratings:

Excellent
Very Good
Good
Average
Fair
Poor

Additional explanations available upon client request.

Comments Regarding Improvements

Based on an exterior only inspection the subject property was observed to be built with good quality building materials and to be in fair condition at the time of inspection. Depreciation exists from deferred maintenance, typical wear and typical tear. This appraisal is made based on the assumption that the subjects interior condition is equal to it's "Fair" exterior condition (e.g., suffers from deferred maintenance, some interior items need repairs, dated features, worn flooring, etc.). See addendum regarding condition scale. Features include: 1 Car Garage, Covered Porch, Patio, Partial Fence, Some Gutters, Etc... The reported room count is based on information found in the tax records. No inspection/observation of the subjects interior was completed.

Subject Photo Page

Listing/Client	Graves & Davis, LLC as counsel for Danielle Brown				
Property Address	8297 Delhi Rd				
City	North Charleston	County	Charleston	State	SC
Zip Code	29406				
Owner	Danielle C Brown & Crystal Brown Nwaneri				



Subject Front

8297 Delhi Rd
 Sales Price N/A
 Gross Living Area 1,450
 Total Rooms 6
 Total Bedrooms 3
 Total Bathrooms 2
 Location Northwest/Intensive
 View Similar Homes
 Site 0.28 Acres
 Quality Brick/Wood/Good
 Age 34



Rear



Subject Street

Comparable Photos 1-3

Lender/Client	Graves & Davis, LLC as counsel for Danielle Brown						
Property Address	8297 Delby Rd						
City	North Charleston	County	Charleston	State	SC	Zip Code	29406
Owner	Danielle C Brown & Crystal Brown Nwaneri						



Comparable 1

8170 Warmwright Rd
 Prox. to Subject 0.35 miles SE
 Sales Price 260,000
 Gross Living Area 1,540
 Total Rooms 6
 Total Bedrooms 3
 Total Bathrooms 2
 Location Northwood Est.
 View Similar Homes
 Site 0.31 Acres
 Quality Vinyl/Siding/AG
 Age 49



Comparable 2

2952 Nantuxett Ave
 Prox. to Subject 0.48 miles SW
 Sales Price 212,000
 Gross Living Area 1,246
 Total Rooms 6
 Total Bedrooms 3
 Total Bathrooms 2
 Location Colony North
 View Similar Homes
 Site 0.26 Acres
 Quality Wood/Siding/Arg
 Age 41



Comparable 3

2529 Otranto Rd
 Prox. to Subject 0.69 miles NE
 Sales Price 310,000
 Gross Living Area 2,069
 Total Rooms 6
 Total Bedrooms 3
 Total Bathrooms 2
 Location Northwood Est./Burg Rd
 View Similar Homes
 Site 0.27 Acres
 Quality Brick/Wood/Good
 Age 59

Comparable Photos 4-6

Order/Client	Graves & Davis, LLC as counsel for Danielle Brown						
Property Address	8297 Delhi Rd						
City	North Charleston	County	Charleston	State	S.C.	Zip Code	29406
Order	Danielle C Brown & Crystal Brown Nwaneri						



Comparable 4

3269 Dublin Rd
 Prox. to Subject 1.49 miles S
 Sales Price 205,000
 Gross Living Area 1,332
 Total Rooms 6
 Total Bedrooms 3
 Total Bathrooms 1.1
 Location Pepperhill
 View Similar Homes
 Site 0.25 Acres
 Quality Brick/Good
 Age 49



Comparable 5

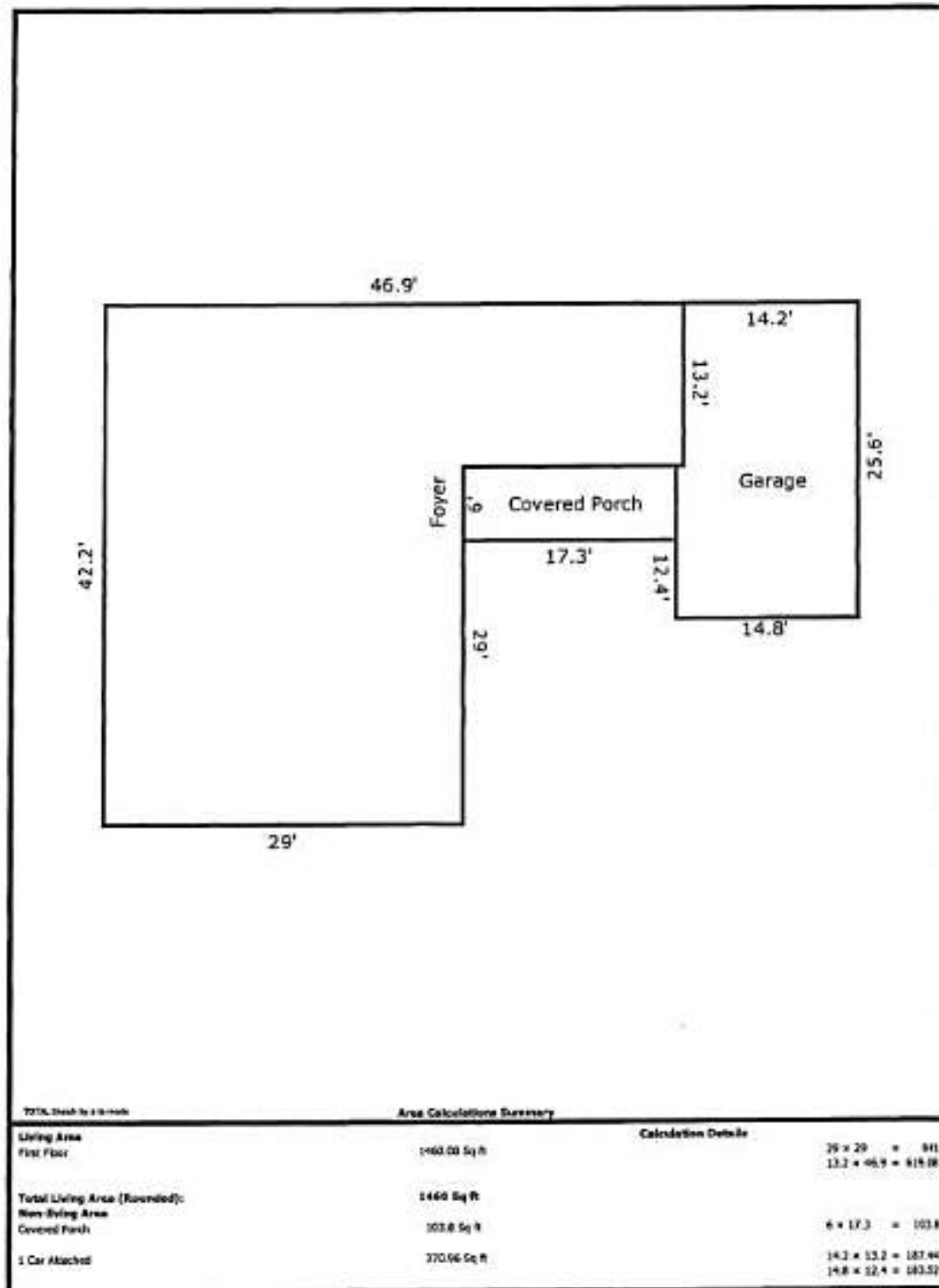
8520 Delhi Rd
 Prox. to Subject 0.39 miles NE
 Sales Price 270,000
 Gross Living Area 1,901
 Total Rooms 6
 Total Bedrooms 3
 Total Bathrooms 2
 Location Northwood Est.
 View Similar Homes
 Site 0.34 Acres
 Quality Brick/Wood/Good
 Age 58

Comparable 6

Prox. to Subject
 Sales Price
 Gross Living Area
 Total Rooms
 Total Bedrooms
 Total Bathrooms
 Location
 View
 Site
 Quality
 Age

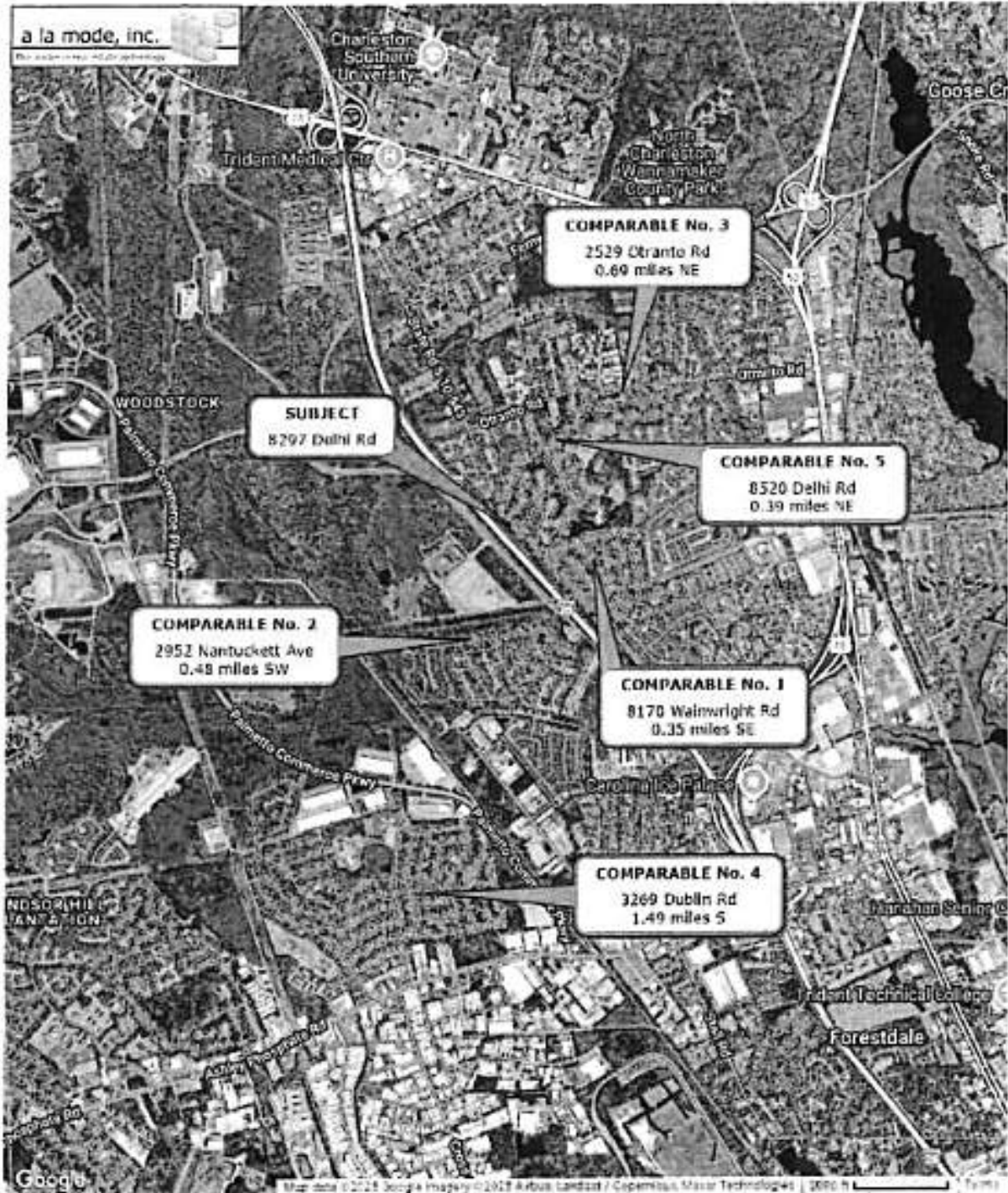
Building Sketch

Lender/Client	Graves & Davis, LLC as counsel for Danielle Brown				
Property Address	8297 Delhi Rd				
City	North Charleston	County	Charleston	State	SC Zip Code 29405
Owner	Danielle C Brown & Crystal Brown Nwaneri				



Location Map

Lender/Cient	Graves & Davis, LLC as counsel for Danielle Brown				
Property Address	8297 Delhi Rd				
City	North Charleston	County	Charleston	State	SC
Owner	Danielle C Brown & Crystal Brown Nwaneri				
Zip Code	29405				



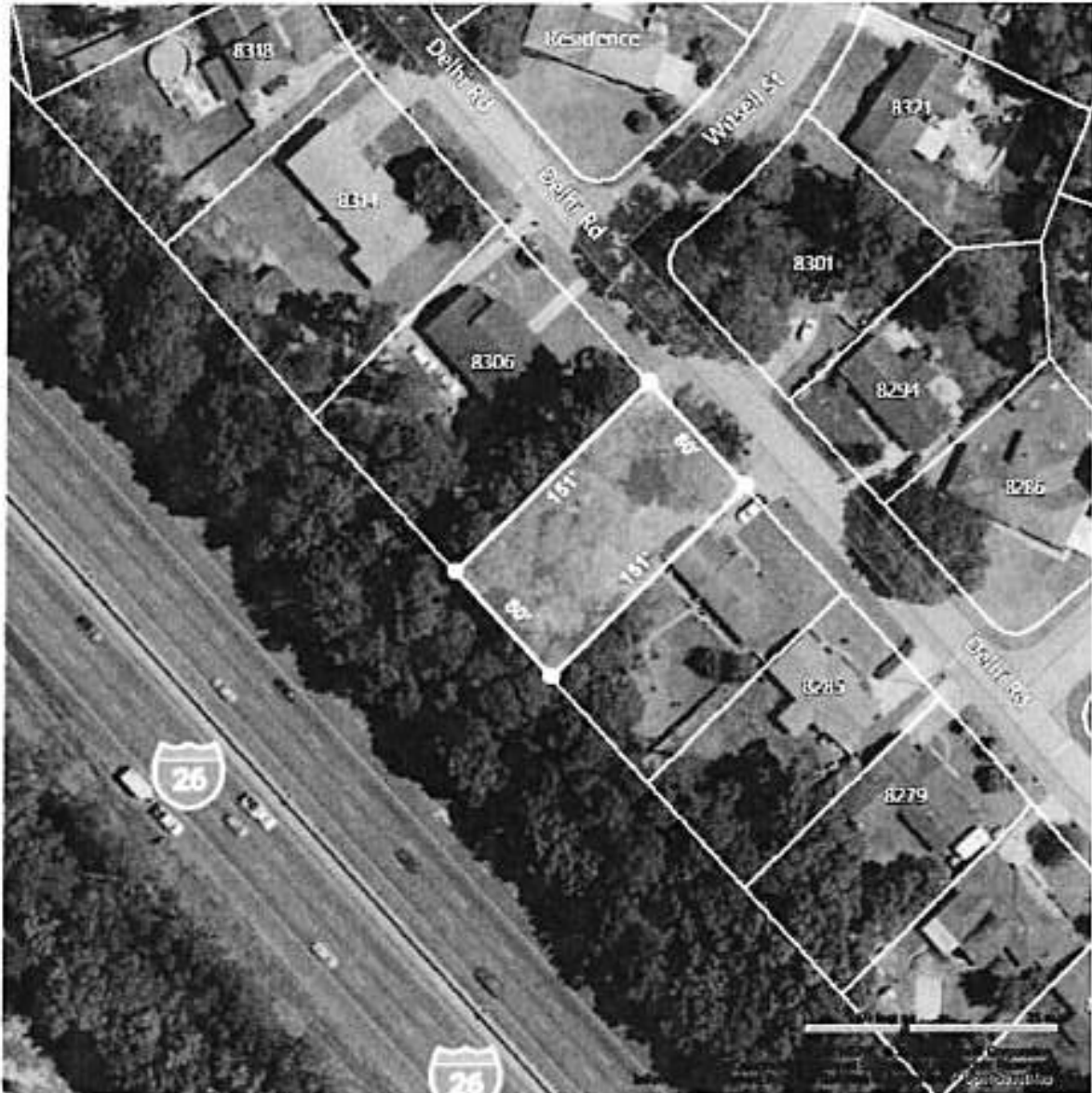
Plat

 **MLS Tax**

Powered by CRS Data

TV

Map for Parcel Address: 8297 DdH Rd North Charleston, SC 29406-9724 Parcel ID: 485-05-00-026



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Information Deemed Reliable But Not Guaranteed.

Location Map

Land/Client	Graves & Davis, LLC as counsel for Danielle Brown			
Property Address	8297 Delhi Rd			
City	North Charleston	County	Charleston	State SC Zip Code 29406
Owner	Danielle C Brown & Crystal Brown Nwaneri			



Photograph Addendum

Lender/Client	Graves & Davis, LLC as counsel for Danielle Brown				
Property Address	8297 Delhi Rd				
City	North Charleston	County	Charleston	State	SC Zip Code 29406
Owner	Danielle C Brown & Crystal Brown Nwaneri				



View Towards Interstate



Deferred Maintenance

ASSUMPTIONS & LIMITING CONDITIONS

SUBJECT PROPERTY

Property Address:	8297 Delhi Rd	City:	North Charleston
State:	SC	Zip Code:	29406
		County:	Charleston

STATEMENT OF ASSUMPTIONS & LIMITING CONDITIONS

- The appraiser will not be responsible for matters of a legal nature that affect either the property being appraised or the title to it. The appraiser assumes that the title is good and marketable and, therefore, will not render any opinions about the title. The property is appraised on the basis of it being under responsible ownership.
- The appraiser may have provided a sketch in the appraisal report to show approximate dimensions of the improvements, and any such sketch is included only to assist the reader of the report in visualizing the property and understanding the appraiser's determination of its size. Unless otherwise indicated, a Land Survey was not performed.
- If so indicated, the appraiser has examined the available flood maps that are provided by the Federal Emergency Management Agency (or other data sources) and has noted in the appraisal report whether the subject site is located in an identified Special Flood Hazard Area. Because the appraiser is not a surveyor, he or she makes no guarantees, express or implied, regarding this determination.
- The appraiser will not give testimony or appear in court because he or she made an appraisal of the property in question, unless specific arrangements to do so have been made beforehand.
- The appraiser has noted in the appraisal report any adverse conditions (including, but not limited to, needed repairs, depreciation, the presence of hazardous wastes, toxic substances, etc.) observed during the inspection of the subject property, or that he or she became aware of during the normal research involved in performing the appraisal. Unless otherwise stated in the appraisal report, the appraiser has no knowledge of any hidden or unapparent conditions of the property, or adverse environmental conditions (including, but not limited to, the presence of hazardous wastes, toxic substances, etc.) that would make the property more or less valuable, and has assumed that there are no such conditions and makes no guarantees or warranties, express or implied, regarding the condition of the property. The appraiser will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because the appraiser is not an expert in the field of environmental hazards, the appraisal report must not be considered as an environmental assessment of the property.
- The appraiser obtained the information, estimates, and opinions that were expressed in the appraisal report from sources that he or she considers to be reliable and believes them to be true and correct. The appraiser does not assume responsibility for the accuracy of such items that were furnished by other parties.
- The appraiser will not disclose the contents of the appraisal report except as provided for in the Uniform Standards of Professional Appraisal Practice, and any applicable federal, state or local laws.
- If this appraisal is indicated as subject to satisfactory completion, repairs, or alterations, the appraiser has based his or her appraisal report and valuation conclusion on the assumption that completion of the improvements will be performed in a workmanlike manner.
- An appraiser's client is the party (or parties) who engage an appraiser in a specific assignment. Any other party acquiring this report from the client does not become a party to the appraiser-client relationship. Any persons receiving this appraisal report because of disclosure requirements applicable to the appraiser's client do not become intended users of this report unless specifically identified by the client at the time of the assignment.
- The appraiser's written consent and approval must be obtained before this appraisal report can be conveyed by anyone to the public, through advertising, public relations, news, sales, or by means of any other media, or by its inclusion in a private or public database.
- An appraisal of real property is not a 'home inspection' and should not be construed as such. As part of the valuation process, the appraiser performs a non-invasive visual inventory that is not intended to reveal defects or detrimental conditions that are not readily apparent. The presence of such conditions or defects could adversely affect the appraiser's opinion of value. Clients with concerns about such potential negative factors are encouraged to engage the appropriate type of expert to investigate.
- In developing this appraisal, the appraiser has incorporated only the Sales Comparison approach. The appraiser has excluded the Cost and Income approaches. The appraiser has determined that this appraisal process is not so limited that the results of the assignment are no longer credible.

Client: Graves & Davis, LLC as counsel for Daniel Client File No.: BROWN Appraiser File No.: 25092789



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DEFINITIONS & SCOPE OF WORK

SUBJECT PROPERTY

Property Address:	8297 Delhi Rd	City:	North Charleston
State:	SC	Zip Code:	29406
		County:	Charleston

DEFINITION OF MARKET VALUE *:

Market value means the most probable price which a property should bring in a competitive and open market under all conditions requisite to a fair sale, the buyer and seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Implicit in this definition is the consummation of a sale as of a specified date and the passing of title from seller to buyer under conditions whereby:

1. Buyer and seller are typically motivated;
2. Both parties are well informed or well advised and acting in what they consider their own best interests;
3. A reasonable time is allowed for exposure in the open market;
4. Payment is made in terms of cash in U.S. dollars or in terms of financial arrangements comparable thereto; and
5. The price represents the normal consideration for the property sold unaffected by special or creative financing or sales concessions granted by anyone associated with the sale.

* This definition is from regulations published by federal regulatory agencies pursuant to Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act (FIRREA) of 1989 between July 5, 1990, and August 24, 1990, by the Federal Reserve System (FRS), National Credit Union Administration (NCUA), Federal Deposit Insurance Corporation (FDIC), the Office of Thrift Supervision (OTS), and the Office of Comptroller of the Currency (OCC). This definition is also referenced in regulations jointly published by the OCC, OTS, FRS, and FDIC on June 7, 1994, and in the Interagency Appraisal and Evaluation Guidelines, dated October 27, 1994.

The Scope of Work is the type and extent of research and analyses performed in an appraisal assignment that is required to produce credible assignment results, given the nature of the appraisal problem, the specific requirements of the intended user(s) and the intended use of the appraisal report. Reliance upon this report, regardless of how acquired, by any party or for any use, other than those specified in this report by the Appraiser, is prohibited. The Opinion of Value that is the conclusion of this report is credible only within the context of the Scope of Work, Effective Date, the Date of Report, the Intended User(s), the Intended Use, the stated Assumptions and Limiting Conditions, any Hypothetical Conditions and/or Extraordinary Assumptions, and the Type of Value, as defined herein. The appraiser, appraisal firm, and related parties assume no obligation, liability, or accountability, and will not be responsible for any unauthorized use of this report or its conclusions.

Additional Comments (Scope of Work, Extraordinary Assumptions, Hypothetical Conditions, etc.):

The subjects current use is legally permissible based on current zoning. The lot location, size and shape allow for the present improvements. Current market conditions indicate that a single family residence is it's financially feasible and maximally productive use. The highest and best use, as if vacant, would be to build a single family residence.

Client: Graves & Davis, LLC as counsel for Daniel Client File No.: BROWN

Appraiser File No.: 25092769



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Page 2 of 3 10/2007

CERTIFICATIONS

SUBJECT PROPERTY

Property Address: 8297 Delhi Rd City: North Charleston
State: SC Zip Code: 29405 County: Charleston

APPRAISER'S CERTIFICATION

I certify that, to the best of my knowledge and belief:

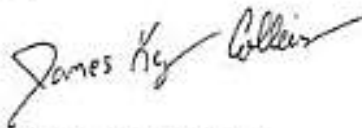
- The statements of fact contained in this report are true and correct.
- The credibility of this report, for the stated use by the stated user(s), of the reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions, and are my personal, impartial, and unbiased professional analyses, opinions, and conclusions.
- I have no present or prospective interest in the property that is the subject of this report and no personal interest with respect to the parties involved.
- I have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment.
- My engagement in this assignment was not contingent upon developing or reporting predetermined results.
- My compensation for completing this assignment is not contingent upon the development or reporting of a predetermined value or direction in value that favors the cause of the client, the amount of the value opinion, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this appraisal.
- My analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the Uniform Standards of Professional Appraisal Practice that were in effect at the time this report was prepared.
- I did not base, either partially or completely, my analysis and/or the opinion of value in the appraisal report on the race, color, religion, sex, handicap, familial status, or national origin of either the prospective owners or occupants of the subject property, or of the present owners or occupants of the properties in the vicinity of the subject property.
- Unless otherwise indicated, I have made a personal inspection of the property that is the subject of this report.
- Unless otherwise indicated, no one provided significant real property appraisal assistance to the person(s) signing this certification.

Additional Certifications:

I have performed no appraisals or other services, as an appraiser or in any other capacity, regarding the property that is the subject of this appraisal within the 3 year time period immediately preceding acceptance of this assignment. I have no current or prospective interest in the subject property or parties involved.

SIGNATURES

APPRAISER



Appraiser Name: James Key Collins
Company: Due Course Appraisal Co.
Phone: 843-568-9784 Fax:
E-mail: key@duecourseappraisals.com
Date of Report (Signature): 09/16/2025
License or Certification #: 4799

State: SC

SUPERVISORY APPRAISER (if required)
or CO-APPRAISER (if applicable)

Supervisory or
Co-Appraiser Name:
Company:

Phone: Fax:

E-mail:

Date of Report (Signature):

License or Certification #:

State:

Expiration Date of License or Certification: 06/30/2026

Inspection of Subject: ☐ Interior & Exterior ☒ Exterior Only ☐ None

Date of Inspection: 09/11/2025

Expiration Date of License or Certification:

Inspection of Subject: ☐ Interior & Exterior ☐ Exterior Only ☐ None

Date of Inspection:

Client: Graves & Davis, LLC as counsel for Daniels Client File No.: BROWN

Appraiser File No.: 25092769



FIRREA / USPAP ADDENDUM

Lender/Client	Graves & Davis, LLC as counsel for Danielle Brown	File No. 25032769
Property Address	8297 Delhi Rd	
City	North Charleston	County Charleston State SC Zip Code 29406
Owner	Danielle C Brown & Crystal Brown Nwaneri	
Purpose	The purpose of the appraisal is to determine the market value of the subject property as defined herein. The function of the appraisal is to assist the named client in evaluating the subject property for a Partition Action.	
Scope of Work	See Addendum	
Intended Use / Intended User	The intended use of this appraisal is to assist the client, as the intended user of this report, in evaluating the subject property for a Partition Action.	
Intended User(s)	Graves & Davis, LLC as counsel for Danielle Brown & the Charleston County Master-In-Equity Court.	
History of Property	The subject is not currently listed for sale per MLS records.	
Prior sale	See Report	
Exposure Time / Marketing Time	See Appraisal Report	
Personal (non-realty) Transfers	Not Applicable	
Additional Comments	See Addendum and Report for additional commentary.	
Certification Supplement	<p>1. This appraisal assignment was not based on a requested minimum valuation, a specific valuation, or an approval of a loan.</p> <p>2. My compensation is not contingent upon the reporting of a predetermined value or direction in value that favors the cause of the client, the amount of the value estimate, the attainment of a stipulated result or the occurrence of a subsequent event.</p> <p>3. I have performed no appraisals or other services, as an appraiser or in any other capacity, regarding the property that is the subject of this appraisal within the 3 year time period immediately preceding acceptance of this assignment. I have no current or prospective interest in the subject property or parties involved.</p>	
Appraiser:	James Key Collins	
Signed Date:	09/16/2025	
Certification or License #:	4799	
Certification or License State:	SC Expires: 06/30/2026	
Effective Date of Appraisal:	09/11/2025	
Supervisory Appraiser:		
Signed Date:		
Certification or License #:		
Certification or License State:		
Inspection of Subject	☐ Did Not ☐ Exterior Only ☐ Interior and Exterior	

Filing in Case 2023-cp-6212

6 messages

Crystal Brown <crystal.brown@gmail.com>

Thu, Sep 18, 2025 at 11:45 PM

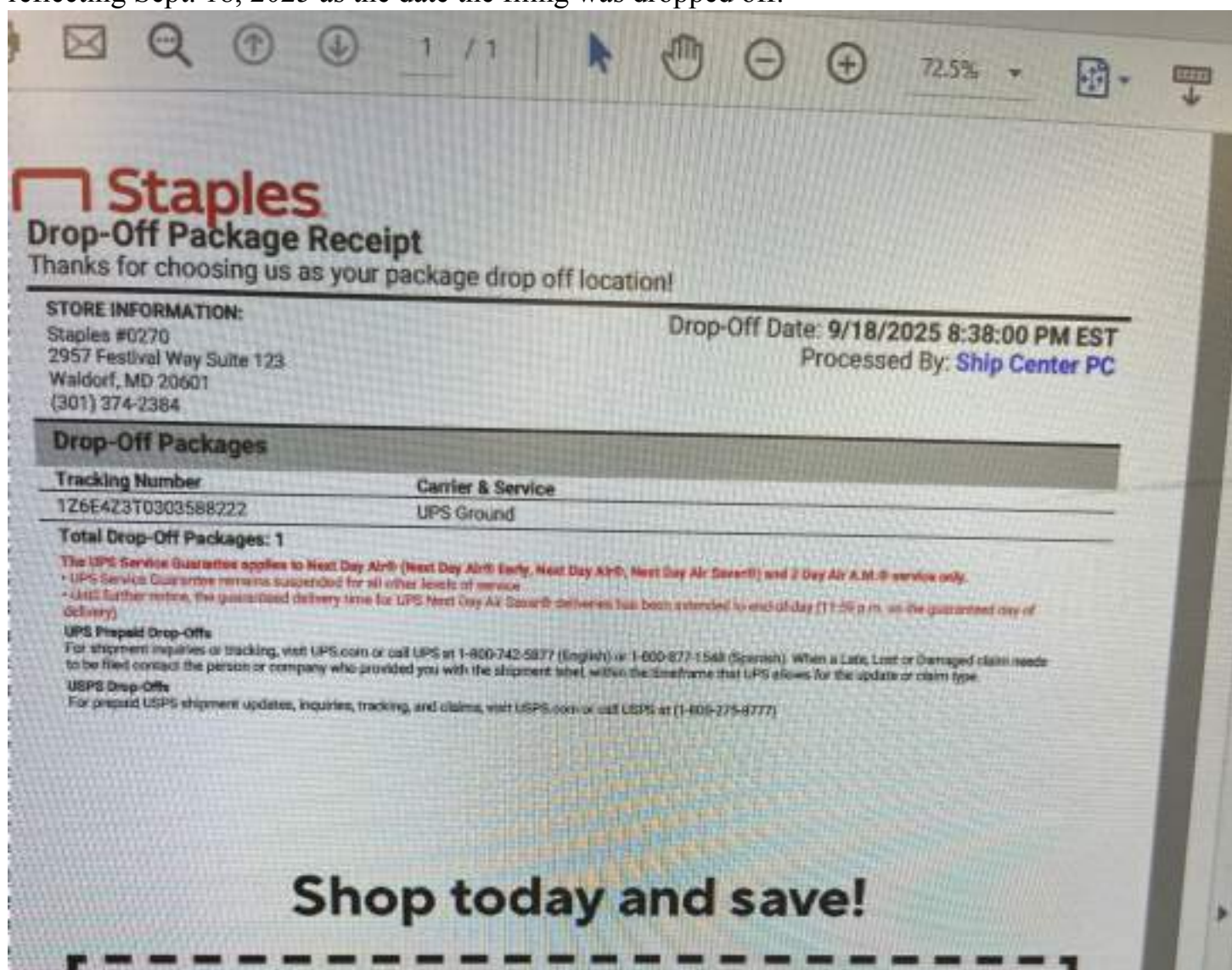
To: <clerkofcourt@charlestoncounty.org>

Cc: Logan Davis <ldavis@gravesdavis.com>, MIELawClerk <MIELawClerk@charlestoncounty.org>

Bcc: Crystal Brown <canarywithaw@icloud.com>, Crystal Brown <crystal.brown@gmail.com>

Dear Clerk of Court:

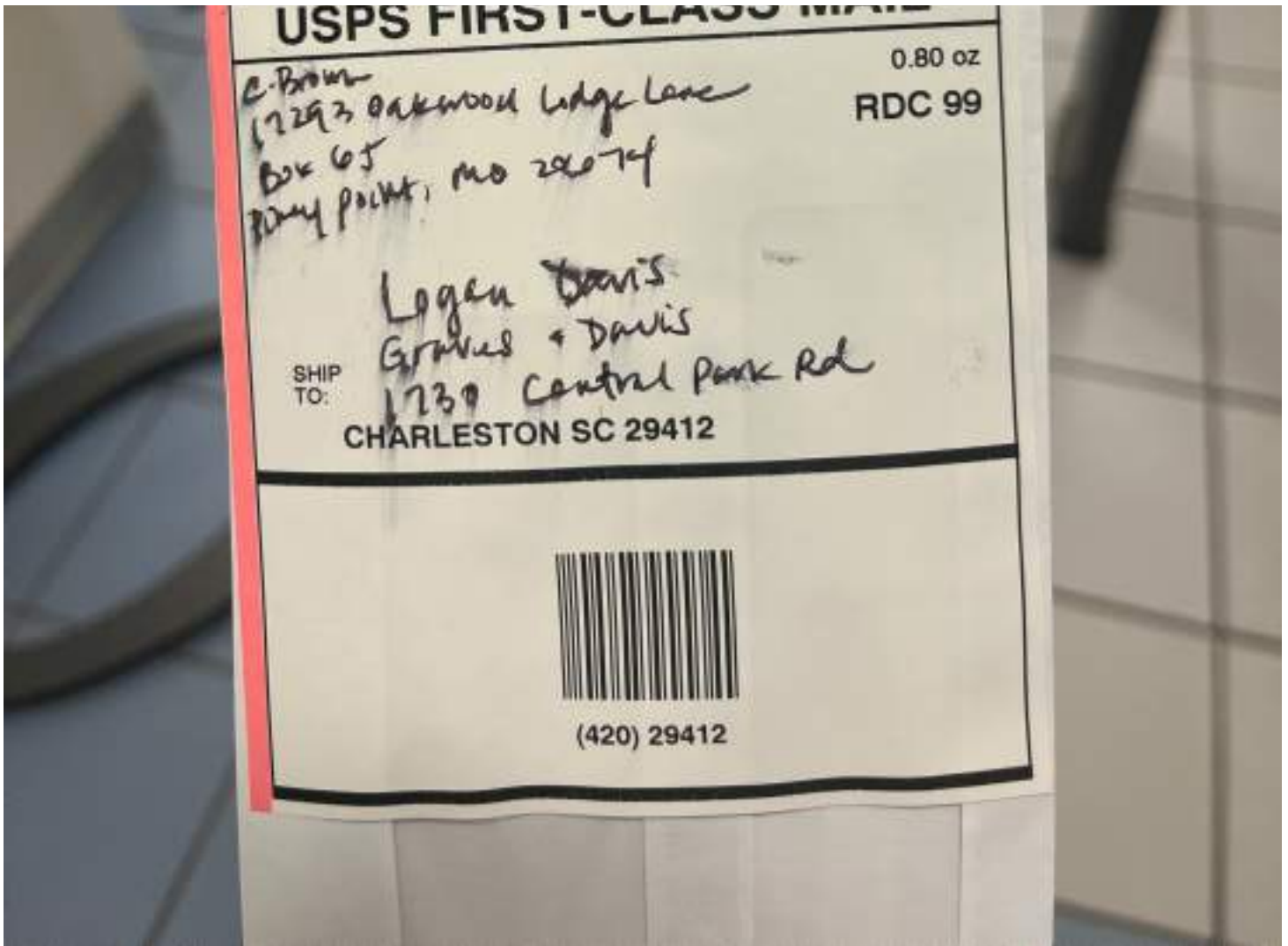
Attached please find a copy of pro se Defendant's Motion to Vacate Orders and for Order Declaring Heirs Property, which was sent to the Clerk's office by UPS expedited delivery today, Sept. 18, 2025 at 8:38pm (UPS tracking number 1Z6E4Z3T0303588222). See UPS/Staples receipt reflecting Sept. 18, 2025 as the date the filing was dropped off.





Defendant also served a copy to the plaintiff's counsel, Logan Davis, via US Postal Service today, Sept. 18, 2025. See USPS receipt.





Per the SC Rules of Civil Procedure, the date of mailing and service is the filing date, making today, Sept. 18, the date of filing. A payment of \$50 for the motion filing fee was included in the UPS package to the court.

Please let me know if you have any questions.

Thank you,

Crystal Brown Nwaneri

Cc:
Logan Davis, Plaintiff's Counsel
Master in Equity Law Clerk

Encl:
Sept. 18 Motion

CamScanner 9-18-25 20.30_2.jpeg, CamScanner 9-18-25 20.30_5.jpeg, CamScanner 9-18-25 20.30_4.jpeg, CamScanner 9-18-25 20.30_3.jpeg

Logan Davis <Ldavis@gravesdavis.com>

Fri, Sep 19, 2025 at 6:30 AM

To: Crystal Brown <crystal.brown@gmail.com>, clerkofcourt@charlestoncounty.org <clerkofcourt@charlestoncounty.org>

Cc: MIELawClerk <MIELawClerk@charlestoncounty.org>, Hagan Hiott <hhiott@gravesdavis.com>, Tyler Graves <tgraves@gravesdavis.com>

Good morning, Ms. Brown,

As noted in the email sent from my office on 9/17/2025, there is a hearing scheduled for October 6, 2025, at 1:00 PM. We hope you will join us.

I have attached a courtesy copy of the letter (including enclosures) sent by my office on 9/17/2025, which you should receive today via FedEx as well (one envelope requiring signature and one envelope not requiring signature).

Sincerely,

Logan S. Davis, Esq.
Partner/Attorney
Graves & Davis, LLC
[1730 Central Park Road](#)
[Charleston, SC 29412](#)
Phone: (843) 805-4649
Fax: (843) 620-1047
Ldavis@gravesdavis.com
www.gravesdavis.com



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[Quoted text hidden]

Crystal Brown <crystal.brown@gmail.com>

Fri, Sep 19, 2025 at 10:40 PM

To: Logan Davis <ldavis@gravesdavis.com>

Cc: clerkofcourt@charlestoncounty.org <clerkofcourt@charlestoncounty.org>, MIELawClerk

<MIELawClerk@charlestoncounty.org>, Hagan Hiott <hhiott@gravesdavis.com>, Tyler Graves <tgraves@gravesdavis.com>

Mr. Davis,

I received your email this morning, copied to the Clerk of Court and Law Clerk. While I appreciate that you complied with the 10-day notice requirement this time, your phrasing — “we hope you will join us” — comes across as unnecessarily condescending toward a pro se litigant and out-of-state mother of three who is doing her best to participate fully and fairly.

As the Court is aware, I do not receive electronic notice of filings. The only notice I receive is when opposing counsel forwards an order. Here, counsel waited two full weeks before notifying me of the Court’s September 3 partition order — only sending it on September 17. That delay is prejudicial to a pro se party who must arrange travel, childcare, and filings from another state.

More critically, what was sent on September 17 is not the appraisal the Court ordered. The “exterior-only” drive-by valuation is nothing more than a comparative market analysis. It ignores the interior condition and serious disrepair of the home — including a failing roof — and therefore cannot serve as the required full appraisal for a partition valuation hearing.

The report includes no interior photographs and assumes the home is in “fair” condition and working order. That assumption is inaccurate. Both parties know, and plaintiff has admitted in writing, that the home’s interior condition is poor. Submitting a CMA dressed up as an appraisal wastes the Court’s time and prevents me from preparing for the October 6 hearing.

Accordingly, I respectfully request that opposing counsel provide the full appraisal ordered by the Master no later than Monday, September 22. Without it, I cannot comply with the court’s September 26 election deadline or meaningfully prepare for and participate in the scheduled hearing on October 6, should it proceed over my jurisdictional challenges and objections.

Respectfully submitted,

Crystal Brown Nwaneri

[Quoted text hidden]

Logan Davis <ldavis@gravesdavis.com>

Sat, Sep 20, 2025 at 8:04 AM

To: Crystal Brown <crystal.brown@gmail.com>

Cc: clerkofcourt@charlestoncounty.org <clerkofcourt@charlestoncounty.org>, MIELawClerk

<MIELawClerk@charlestoncounty.org>, Hagan Hiott <hhiott@gravesdavis.com>, Tyler Graves <tgraves@gravesdavis.com>

Ms. Nwaneri,

I respond to your concerns as follows:

Regarding Communication: My previous correspondence stating “we hope you will join us” was intended solely to inform you of the scheduled hearing and your right to attend. I apologize if the phrasing was interpreted otherwise.

Regarding the Appraisal Requirement: The appraisal provided was conducted by a licensed appraiser in South Carolina, in compliance with the Court's September 3 order. The appraisal methodology employed is standard practice and provides a reliable fair market value assessment. The appraiser's valuation accounts for the property's condition, as evidenced by the below-market valuation when compared to neighboring properties.

Regarding Your Valuation Options: You have the opportunity to conduct your own valuation using an appraisal, comparative market analysis, or other reasonable methodology to present an offer to purchase our client's interest at fair market value.

Regarding Your Options: As outlined in the Court's order, you have the opportunity to exercise your right of first refusal by making an offer to purchase the property. This option remains available to you through the September 26, 2025 deadline.

Regarding Notice: We have complied with all applicable South Carolina Rules of Civil Procedure regarding notice and filing requirements.

[Quoted text hidden]

Crystal Brown <crystal.brown@gmail.com>

Sun, Sep 21, 2025 at 11:59 PM

To: Logan Davis <ldavis@gravesdavis.com>

Cc: clerkofcourt@charlestoncounty.org <clerkofcourt@charlestoncounty.org>, MIELawClerk

<MIELawClerk@charlestoncounty.org>, Hagan Hiott <hhiott@gravesdavis.com>, Tyler Graves <tgraves@gravesdavis.com>

Mr. Davis,

I acknowledge your response. However, it overlooks the serious procedural and substantive defects I have raised from the outset.

1. Notice and Service Failures – If plaintiff truly wanted my participation, notice would have been proper and timely. Instead, I was:
 - Never served with the Complaint, motions for service by publication, or motion for default when they were filed or granted;
 - Sent the Court's September 3 order only on September 17 — two full weeks late, prejudicing my ability to meet deadlines;
 - Denied the 10-day hearing notice required by Rule 6(d) for the August 25 hearing, which was noticed to me only 9 days before, despite being calendared weeks earlier at plaintiff's request;
 - Never served with your August 22 memorandum in support — only receiving it by email on the business day before the hearing.These repeated failures violate both the letter and spirit of the South Carolina Rules of Civil Procedure and have materially impaired my ability to participate.

2. Response Must Be on the Record – Rather than sending informal emails to Court staff, plaintiff should file signed pleadings addressing the issues raised in my motion — particularly the threshold question of heirs property status.
3. Heirs’ Property Protections – The subject property passed through intestacy and is heirs’ property under South Carolina law, entitled to the statutory protections of the Clementa Pinckney Act. **Those protections — including heightened notice, appraisal, and buyout procedures — have not been followed and are designed to prevent precisely this type of forced sale under circumstances that are neither financially necessary nor equitable.**
4. Equity and Burden of Proof – The home is unencumbered, poses no financial burden on plaintiff, who has neglected to pay the property taxes. A forced sale of our family home under these circumstances is inequitable and inconsistent with the protections heirs’ property is afforded. As petitioner, plaintiff bears the burden of substantiating value, and a drive-by CMA does not satisfy that obligation or the Court’s order for an appraisal.
5. Jurisdictional Objections Preserved – All jurisdictional and due process objections remain preserved, including defective service by publication and the denial of proper notice at multiple stages.

For these reasons, I again request that plaintiff comply with the Court’s order by providing a full, interior appraisal no later than September 22, so that I may meaningfully respond before the September 26 deadline and prepare for the October 6 hearing.

Respectfully,

Crystal Brown Nwaneri

[Quoted text hidden]

Crystal Brown <crystal.brown@gmail.com>
Draft

Fri, Sep 26, 2025 at 11:34 PM

[Quoted text hidden]

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

*Danielle C. Brown,
Plaintiff,*

v.

*Crystal Brown Nwaneri,
Defendant.*

Case No. ~~2023-CP-178~~ ^{CV}
2023-06212

**PRO SE DEFENDANT'S MOTION TO VACATE ORDERS AND FOR RECOGNITION OF
HEIRS' PROPERTY**

I. Background

This dispute arises out of property that descended to both Plaintiff and *pro se* Defendant through intestate succession following the death of their father. Rather than initiate administration cooperatively, Plaintiff unilaterally filed a motion in Probate Court to be named executor. This commenced the proceedings in an atmosphere of hostility and ambush.

Since that time, Plaintiff has made little to no contribution toward the maintenance or preservation of the property. Over a period of eight years, Plaintiff has incurred only approximately \$6,300 in costs, all of which concern cosmetic landscaping as per her own filings. Despite this, she now seeks to force a sale of the property solely to cash out her interest, disregarding the fact that the property is a sentimental family home where Plaintiff and Defendant were born and raised, and inheritance.

II. The Property is Heirs' Property and Should Not Be Subject to a Forced Sale

The subject property qualifies as heirs' property under the Uniform Partition of Heirs' Property Act, S.C. Code Ann. § 15-67-310 et seq. The property was conveyed by intestate succession, is jointly owned by heirs, and carries significant sentimental and ancestral value.

South Carolina law requires courts to provide heightened protections in heirs' property cases, including consideration of partition in kind, buy-out rights, and equitable factors, before resorting to forced sale. See S.C. Code Ann. §§ 15-67-320, 15-67-330. By failing to apply these statutory protections, the Court's orders constitute clear error of law.

①

III. The Master's Recent Orders Were Based on Errors of Law and Fact

The Court's recent rulings—including the August 25, 2025 order and the September 3, 2025 order—should be vacated for the following reasons:

A. August 25, 2025 Order

Defendant resides out of state and is the primary caregiver to three minor children under the age of ten, including a toddler. Nevertheless, the Court denied Defendant's request for reasonable accommodation. The Court's own email states:

From: MIELawClerk <MIELawClerk@charlestoncounty.org>
Date: Monday, August 25, 2025 at 11:17 AM
To: Crystal Brown <crystal.brown@gmail.com>, Logan Davis <Ldavis@gravesdavis.com>
Cc: Martha S. Dennis <MDennis@charlestoncounty.org>, Tyler Graves <tgraves@gravesdavis.com>
Subject: RE: Clarification re: Hearing Scheduled for August 25, 2025

Good morning,

Upon review of the communications and filings in this case, Judge Scarborough has determined that the Defendant did receive proper notice of the hearing and will proceed with the in-person hearing scheduled today for 2:00 p.m. The Court will not allow for the virtual or telephone participation by either party. Additionally, this Court notes that this hearing was continued from the January 29, 2025 date and that the Defendant was found to be in default in September 2024. Thus, the partition hearing set for 2:00 p.m. today will proceed as previously scheduled.

Thank you very much.

Lillian P. Wilkerson, Esq.
Judicial Law Clerk
Charleston County Master In Equity
100 Broad Street, Suite 266
Charleston, SC 29401
Ph: (843) 958-5075
MIELawClerk@charlestoncounty.org

This refusal deprived Defendant, who resides in Maryland, of due process and meaningful access to the Court.

B. September 3, 2025 Order

The Court's September 3 ruling is likewise erroneous. That order states:

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

PROCEDURAL HISTORY AND SERVICE

The Court finds that appropriate notice was provided to Defendant to appear at the hearing.

The record reflects that Plaintiff's counsel filed extensive exhibits along with its Amended Memorandum in Support of Partition by Sale to establish appropriate notice, including:

1. Service by publication in *The Post and Courier* newspaper on May 22, May 29, and June 5, 2024;
 2. Multiple attempts at notice to Defendant's last known address at 17293 Oakwood Lodge Lane, Piney Point, MD 20674;
 3. For the January 29, 2025 hearing: successful delivery on January 21, 2025 (FedEx tracking #771449779691) and attempted delivery requiring signature (FedEx tracking #771449731962);
 4. For the August 25, 2025 hearing: successful delivery on August 15, 2025 (FedEx tracking #883502622602) and successful signed delivery on August 15, 2025 (FedEx tracking #883502697920);
 5. Email notice to Defendant at the email address previously used for communications in this matter.
- The Court confirmed that Defendant is in default pursuant to Rule 55(a), SCRPC, having been entered on September 17, 2024, and has failed to make an appearance in this case.

FINDINGS OF FACT

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

1. Plaintiff and Defendant each own a fifty percent (50%) undivided interest, as tenants-in-common, in the subject property located at 8297 Delhi Road, North Charleston, SC 29406, TMS No.: 485-06-00-026 (the "Property");
2. The Property is not encumbered by any mortgage.
3. The subject Property is the Plaintiff and Defendant's childhood home;

②

4. Plaintiff made attempts to discuss the disposition of the subject Property with Defendant, but has never received a clear answer regarding Defendant's intentions;
5. Plaintiff is agreeable to selling her interest to Defendant at fair market value;
6. Plaintiff wishes the Property to be sold in the event Defendant does not wish to purchase Plaintiff's interest;
7. Plaintiff has incurred costs and expenses related to the ownership of the Property, including landscaping expenses totaling \$6,300.00 from 2019 to present;
8. Plaintiff has incurred attorney's fees and costs related to this partition action;
9. Plaintiff will obtain an appraisal to determine fair market value of the Property.

CONCLUSIONS OF LAW

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

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED:

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

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

But this entire order is factually and legally incorrect. Among other things, Defendant was not properly served, and to the extent service occurred at all, it was attempted in the state of Maryland, not South Carolina. Therefore, the plaintiff's purported service by publication in the Charleston Post & Courier newspaper—a publication Defendant had no access to—was per se insufficient. The Court was aware of Defendant's circumstances in light of another real property case brought by the same Plaintiff, which also came before the Master. See Case No. 2023-cp-4783. In that matter, the Master rushed to rule in Plaintiff's favor, despite Plaintiff's inconsistent and manipulative handling of service issues and probate petitions to obtain title.

In addition, the court's order wrongly states that Defendant "failed to appear" at the August 25 hearing, which is misleading. Defendant was prevented from appearing by the Master's order, emailed at 11:17am on August 25 (i.e., less than 3 hours before the 2pm hearing scheduled that day). The Master is aware that *pro se* Defendant resides in Maryland and is the mother and primary caregiver to 3 young children. The only way Plaintiff could appear was remotely, as explained at length in *pro se* Defendant's communications to the Court on August 22 and 25, 2025.

Further, holding that this property is not "heir property" within the meaning of the Clementa Pinckney statute, is clear error. The property is clearly heir property on its face—it is the childhood home of the parties and passed to them through intestacy in a probate proceeding before this court. This is the definition of heir property, and Defendant is

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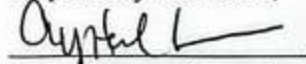
entitled to those protections and defenses. Taken together, these orders show a pattern of factual misapprehension, legal error, and denial of due process.

IV. Prayer for Relief

For the foregoing reasons, Defendant respectfully requests that this Court:

1. Vacate the Master-in-Equity's orders dated August 25, 2025 and September 3, 2025, as issued in error of law and fact, and in violation of due process;
2. Recognize the subject property as heirs' property under S.C. Code Ann. § 15-67-310 et seq., and apply the required protections, including partition in kind or buy-out procedures, rather than forced sale;
3. Stay all further proceedings or sale activity pending proper application of heirs' property protections and resolution of Defendant's claims;
4. Grant reasonable accommodation to Defendant as an out-of-state litigant and primary caregiver of three young children, by affording sufficient notice, time, and opportunity to be heard in all future matters; and
5. Award such other and further relief as this Court deems just and proper.

Respectfully submitted,



Crystal Brown Nwaneri
Defendant, Pro Se
17293 Oakwood Lodge Lane
Piney Point, MD 20674
(917) 651-8546
crystal.brown@gmail.com

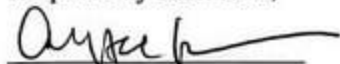
CERTIFICATE OF SERVICE

I hereby certify that I served a copy of this Motion on counsel for Plaintiff, via U.S. Mail, on September 18, 2025:

Logan Davis
Graves & Davis LLC
1730 Central Park Road
Charleston, SC 29412
Ldavis@gravesdavis.com

Dated: Sept. 18, 2025

Respectfully submitted,



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

CHARLESTON SC 294

RETURN SERVICE
REQUESTED

25 SEP 2025

PM 3



POSTAGE

1775★2025

02 4W
0000389541 SEP 24 2025

JULIE J. ARMSTRONG

CLERK OF COURT, C.P. & G.S.

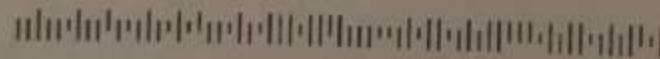
CHARLESTON COUNTY

100 BROAD STREET, SUITE 106

CHARLESTON, SOUTH CAROLINA 29401-2258

RETURN SERVICE REQUESTED

Crystal Brown
17293 Oakwood Lodge Lane
Piney Point, MD 20674



Nicholas Newman Jr.
 Crystal Brown
 P.O. Box 1000
 Greenville, SC 29615

9/18/25

1317

Pay to the order of Clerk of Court \$ 50.00

fifty & 00/100

no other filing fee

August 1

0024000089044975137534 1317

10/2025

Dear Clerk of Court

Please file the attached document in case # 2023-CP-6212, for pro se defendant.

Payment for filing fees is enclosed.

Per South Carolina rules of civil procedure, please note that the date of filing is the date of mailing and service (ie, Sept. 18, 2025).

Thank you,
Crystal Brown Newman

COURT OF COMMON PLEAS
AND GENERAL SESSIONS
100 BROAD STREET, SUITE 106
CHARLESTON, S.C. 29401-2258
(843) 958-5000
(843) 958-5020 FAX
clerkofcourt.charlestoncounty.org



JULIE J. ARMSTRONG
CLERK OF COURT
CHARLESTON COUNTY

FAMILY COURT OF THE
NINTH JUDICIAL CIRCUIT
CHARLESTON COUNTY
100 BROAD STREET, SUITE 143
CHARLESTON, S.C. 29401-2265
(843) 958-4400
(843) 958-4434 FAX
clerkofcourt.charlestoncounty.org

The enclosed document is being returned for the following reason(s):

- ☐ The document is not signed / notarized.
- ☒ The filing fee is ^{over payment} insufficient. The correct amount is: \$25.00
- ☐ The check or money order must be made payable to the Clerk of Court.
- ☐ This document is a copy. We must have an original.
- ☐ This is not a Charleston County case.
- ☐ The case has been transferred/remanded to: _____
- ☐ Inmate litigation must comply with S.C. Code of Laws, Title 24, Chapter 27.
- ☐ The document is refused for filing pursuant to S.C. Code of Laws §30-9-30(B)(1).
- Name of submitting party: _____
- ☐ There is not a case listed in our system that matches this caption.
- ☐ Information may be obtained from our web-site at <http://clerkofcourt.charlestoncounty.org/>
- ☐ The required new case coversheet is not included. (SCCA234)
- ☒ The required motion/order coversheet is not included. (SCCA233)
- ☐ The required order (Form 4) coversheet is not included. (SCRCP Form 4C)
- ☐ Effective October 21, 2019 Charleston County began accepting electronic filings from all South Carolina licensed attorneys. Please re-submit your filing electronically.
- ☐ Other: Please fill out the motion/order coversheet provided & resubmit w/ proper payment.

Staff initials KEL

Date 9/23/25

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

Danielle C. Brown,
Plaintiff,

v.

Crystal Brown Nwaneri,
Defendant.

Case No. ~~2023-06212~~ ^{CR}
2023-06212

**PRO SE DEFENDANT'S MOTION TO VACATE ORDERS AND FOR RECOGNITION OF
HEIRS' PROPERTY**

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