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SC Court of Appeals

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

Appeal from Edgefield County, Court of Common Pleas
The Honorable Vernon F. Dunbar, Circuit Court Judge
Appellate Case No. 2026-001966
C/A No. 2025-CP-19-00353

Camelia Socite, Appellant,

v.

Mandarich Law Group, LLP; PACS Group, Inc.;
Edgefield Post Acute; and ADP, Inc., Defendants,
of which Mandarich Law Group, LLP is the Respondent.

109467

**MOTION FOR LEAVE TO SUPPLEMENT THE APPEAL
AND FOR PROCEDURAL DIRECTIONS**

Under Rules 203, 205, 240, and 267, SCACR, Appellant requests directions integrating the formal dismissal order entered September 21, 2026 into this pending appeal, and leave to update her initial brief and designation to address that order.

Appellant submits an Amended and Supplemental Notice of Appeal with this motion. The three orders attached to that notice are incorporated here as supporting documents under Rule 240(c)(3). This motion seeks procedural relief; it does not ask the Court to decide the appeal's merits on motion.

PROCEDURAL BACKGROUND

1. The August 7, 2026 Form 4 granted Mandarich's dismissal for lack of personal jurisdiction and directed its counsel to prepare a formal order. The August 28 Form 4 denied Appellant's August 10 motion for reconsideration. (Notice Attachments A–B.)
2. Appellant served and filed a notice of appeal on September 2, 2026, limited to Mandarich. She submitted her Initial Brief, Designation of Matter to Be Included in the Record on Appeal, and Proof of Service on September 19, 2026. The brief explained that the formal order remained outstanding and requested directions if necessary. (Initial Brief, pp. 5, 13.)
3. The formal order was electronically signed September 21, 2026 at 11:28:30 a.m. and filed at 12:28 p.m. Appellant received written notice that day. Although the body bears September 14, the entry and electronic signature occurred after her initial-brief submission. (Notice Attachment C.)
4. The formal order dismisses Mandarich without prejudice under Rule 12(b)(2) and expressly does not decide Rule 12(b)(6). It includes an express Maryland-only collection finding and additional written jurisdictional reasoning. Appellant seeks review of that order along with the earlier rulings; she does not consent to those findings.

MEMORANDUM OF AUTHORITIES

A. The formal order should be brought expressly within the appeal. Rule 203(b)(1), SCACR, addresses the timing of appeals where a short order indicates that a fuller order will follow. Rule 203(d)(1) requires service and filing of the notice, supporting orders, and proof of service. Appellant has submitted a supplemental notice promptly after the formal order's entry rather than assuming the earlier notice alone resolves every timing question.

B. This Court should direct the procedural treatment. Rule 205, SCACR, assigns jurisdiction over the appeal to this Court upon service of the notice of appeal. The August 7 direction to prepare a formal order and the later entry create a procedural question that Appellant submits to this Court. She does not concede that a circuit court may substantively alter an appealed ruling, nor assume that every later formal order is void.

C. A limited update will avoid conflicting briefs. Rule 240, SCACR, supplies the procedure for requesting appellate relief. Appellant asks the Court to retain her existing submissions pending directions, allow a short supplement addressing the September 21 order, and permit the corresponding designation update. She seeks no unilateral replacement of her September 19 brief and no addition of evidence that was never presented below.

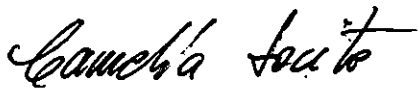
RELIEF REQUESTED

Appellant respectfully requests that the Court:

1. Accept the accompanying Amended and Supplemental Notice of Appeal in No. 2026-001966 and include the September 21 order within the scope of review;
2. Retain the September 19 brief and designation pending further directions and grant 15 days after the Court's order to serve and file a supplemental initial brief, limited to 5 pages of substantive text addressing the September 21 order, and a supplemental designation adding that order;
3. Set corresponding response and record-preparation deadlines, or direct a consolidated amended brief instead if the Court prefers; and
4. If further circuit-court action is necessary before review, grant a limited remand for that specified purpose, with directions concerning preservation of the pending appeal and any further notice or briefing required.

Appellant requests prompt consideration because the new order may implicate post-order deadlines. She recognizes that this motion does not itself stay any deadline under Rule 240(b). She seeks no stay of unrelated proceedings against PACS or Edgefield.

Respectfully submitted,



Camelia Socite, Appellant Pro Se
7202 Terrace Drive
Appling, GA 30802
(773) 447-5788
Cami5788@yahoo.com

Date: 09/25, 2026

PROOF OF SERVICE

Appellate Case No. 2026-001966

I certify that on 09/25, 2026, I served a true and correct copy of the Motion for Leave to Supplement the Appeal and for Procedural Directions, together with the accompanying notice and its Orders A–C, by depositing copies in the United States Mail, postage prepaid, addressed as follows:

David A. Grassi, Jr.

Frost Echols LLC

P.O. Box 12645

Rock Hill, SC 29731

Counsel for Respondent Mandarin Law Group, LLP

J. Bennett Crites III, Cameron A. Tabrizian,

and Shelby H. Pasquini

Burr & Forman LLP

115 Fairchild Street, Suite 200

Daniel Island, SC 29492

Counsel for PACS Group, Inc. and Edgefield Community

Healthcare, LLC d/b/a Edgefield Post Acute

The copy to Burr & Forman is provided because its clients remain parties in the circuit-court action. No relief against those clients is sought in this appeal.



Camelia Socite

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

Appeal from Edgefield County, Court of Common Pleas
The Honorable Vernon F. Dunbar, Circuit Court Judge
Appellate Case No. 2026-001966
C/A No. 2025-CP-19-00353

Camelia Socite, Appellant,

v.

Mandarich Law Group, LLP; PACS Group, Inc.;
Edgefield Post Acute; and ADP, Inc., Defendants,
of which Mandarich Law Group, LLP is the Respondent.

AMENDED AND SUPPLEMENTAL NOTICE OF APPEAL

Appellant Camelia Socite hereby appeals to the South Carolina Court of Appeals from the Order Granting Mandarich Law Group, LLP's Motion to Dismiss for a Lack of Personal Jurisdiction, electronically signed and entered on September 21, 2026, in the above circuit-court action.

Appellant received written notice of entry on September 21, 2026. The order's body bears September 14, 2026; its electronic signature and filing stamp reflect September 21, 2026.

SCOPE OF THIS NOTICE

This notice supplements the notice of appeal served and filed September 2, 2026, now pending as Appellate Case No. 2026-001966. It adds the September 21 formal order and retains the appeal from the August 7, 2026 ruling dismissing Mandarich and the August 28, 2026 denial of Appellant's August 10 reconsideration motion, insofar as those rulings concern Mandarich.

Appellant does not withdraw the existing appeal, consent to the dismissal, or abandon the issues presented in the initial brief submitted September 19, 2026. This notice is also intended to give timely notice of appeal from the September 21 order under Rule 203(b)(1), SCACR, independently of the earlier notice.

The appeal remains limited to Mandarich. It does not seek review of the rulings concerning PACS or Edgefield. The related pending appeal is No. 2026-001966; Appellant requests administration of this notice in that appeal.

Attached orders: A — August 7, 2026 (3 pages); B — August 28, 2026 (3 pages); C — September 21, 2026 (4 pages).

Respectfully submitted,



Camelia Socite, Appellant Pro Se
7202 Terrace Drive
Appling, GA 30802
(773) 447-5788
Cami5788@yahoo.com

Date: 09/25, 2026

PROOF OF SERVICE

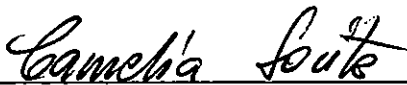
Appellate Case No. 2026-001966

I certify that on 09/25, 2026, I served a true and correct copy of the Amended and Supplemental Notice of Appeal, including attached Orders A–C, by depositing copies in the United States Mail, postage prepaid, addressed as follows:

David A. Grassi, Jr.
Frost Echols LLC
P.O. Box 12645
Rock Hill, SC 29731
Counsel for Respondent Mandarin Law Group, LLP

**J. Bennett Crites III, Cameron A. Tabrizian,
and Shelby H. Pasquini**
Burr & Forman LLP
115 Fairchild Street, Suite 200
Daniel Island, SC 29492
Counsel for PACS Group, Inc. and Edgefield Community
Healthcare, LLC d/b/a Edgefield Post Acute

The copy to Burr & Forman is provided because its clients remain parties in the circuit-court action. No relief against those clients is sought in this appeal.


Camelia Socite

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2025CP1900353

Camelia Socite
PLAINTIFF(S)

Mandarich Law Group, LLP et al et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

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

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

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

Please see page 2 below.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☒ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 08/07/2026 .

ADP, Inc.
Camelia Socite for Camelia Socite
Mandarich Law Group, LLP et al for Mandarich Law Group, LLP et al
Mandarich Law Group, LLP et al for Mandarich Law Group, LLP et al
Camelia Socite for Camelia Socite

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

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

This matter came before this Court on July 20, 2026 upon Plaintiff's Motion to determine the sufficiency of Defendant's Answer. Plaintiff's Motion to compel, and Defendant's Motion to Dismiss.

Plaintiff, Camelia Socite, represented herself and Defendant appeared represented by Chad Echols.

After hearing the arguments made by the Parties and a review of the filings in this matter, the Court's decision is as follows:

- 1) Plaintiff's Motion to compel is respectfully denied. Defendant has complied with Plaintiff's discovery requests and requests for production of documents. However, the request was not made pursuant to Rule 34. Additionally, Plaintiff's RTA exceeded the allowable 20 requests pursuant to Rule 36(c).
- 2) Plaintiff's Motion to determine the sufficiency of Defendant Mandarin Law Group's Answers to requests for admission is respectfully denied because of the lack of Personal Jurisdiction.
- 3) Defendant Mandarin Law Group's Motion to Dismiss is granted. Defendant did not act directly or indirectly to avail itself the benefits and protections granted by the laws of South Carolina. There is no continuing relationship or obligations (minimum contacts) which would subject Defendant to the jurisdiction of this Court.

Mr. Echols, please prepare a formal Order.

IT IS SO ORDERED.



Edgefield Common Pleas

Case Caption: Camelia Socite VS Mandarich Law Group, LLP et al , defendant, et al
Case Number: 2025CP1900353
Type: Order/Electronic Form 4

So Ordered

Vernon F. Dunbar

Electronically signed on 2026-08-07 10:28:08 page 3 of 3

ELECTRONICALLY FILED - 2026 Aug 07 11:51 AM - EDGEFIELD - COMMON PLEAS - CASE#2025CP1900353

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2025CP1900353

Camelia Socite
 PLAINTIFF(S)

Mandarich Law Group, LLP et al et al
 DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

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

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

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

This matter came before this Court upon Plaintiff's Motion for Reconsideration of the Order filed on August 7, 2026 pursuant to Rule 50(b) of the South Carolina Rules of Civil Procedure (SCRCP), alternatively Rule 59(e) of the SCRCP, which was timely filed with the Court by Plaintiff on August 10, 2026.

After careful consideration of the arguments, filings of Counsel, and a review of the evidence and record in this matter, this Court respectfully denies the Motion for Reconsideration.

IT IS SO ORDERED.

ORDER INFORMATION

This order ☐ ends ☒ does not end the case.

☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 08/28/2026 .

ADP, Inc.

Camelia Socite for Camelia Socite

Mandarich Law Group, LLP et al for Mandarich Law Group, LLP et al

Mandarich Law Group, LLP et al for Mandarich Law Group, LLP et al

Camelia Socite for Camelia Socite

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

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



Edgefield Common Pleas

Case Caption: Camelia Socite VS Mandarich Law Group, LLP et al , defendant, et al
Case Number: 2025CP1900353
Type: Order/Electronic Form 4

So Ordered

Vernon F. Dunbar

Electronically signed on 2026-08-28 08:52:24 page 3 of 3

ELECTRONICALLY FILED - 2026 Aug 28 9:07 AM - EDGEFIELD - COMMON PLEAS - CASE#2025CP1900353

STATE OF SOUTH CAROLINA

COUNTY OF EDGEFIELD

Camelia Socite,

Plaintiff,

v.

Mandarich Law Group, LLP, PACS Group,
Inc., Edgefield Post Acute, and ADP, Inc.,

Defendants.

IN THE COURT OF COMMON PLEAS
ELEVENTH JUDICIAL CIRCUIT
C/A No. 2025-CP-19-00353

**ORDER GRANTING MANDARICH LAW
GROUP, LLP'S MOTION TO DISMISS FOR
A LACK OF PERSONAL JURISDICTION**

THIS MATTER comes before the Court upon Defendant Mandarich Law Group, LLP's ("Mandarich") Motion to Dismiss for a lack of personal jurisdiction and for failure to state a claim. Plaintiff Camelia Socite is a Georgia resident who works in South Carolina. The company for which Plaintiff works is headquartered outside South Carolina. Mandarich is an Illinois law firm which obtained a judgment against Plaintiff on behalf of its client in Illinois while Plaintiff was an Illinois resident. Plaintiff alleges Mandarich wrongfully garnished her wages in its attempts to collect on the Illinois judgment.

Under South Carolina law, a court may exercise personal jurisdiction over a nonresident defendant only as permitted by the State's long-arm statute and consistent with the Due Process Clause of the Fourteenth Amendment. S.C. Code Ann. §§ 36-2-802, 36-2-803. Because South Carolina's long-arm statute has been construed to extend to the outer limits allowed by due process, the statutory and constitutional inquiries parallel each other, and the sole question becomes whether the exercise of jurisdiction would violate due process. *Abdulla v. S. Bank*, 439 S.C. 391, 402, 887 S.E.2d 138, 143 (Ct. App. 2023). Due process requires the Court to (1) find that the defendant has the requisite minimum contacts with South Carolina and (2) find that the exercise of jurisdiction is reasonable and fair, and the plaintiff bears the burden of establishing both

elements. *Id.*; *Hidria, USA, Inc. v. Delo*, 415 S.C. 533, 541, 783 S.E.2d 839, 843 (Ct. App. 2016). To satisfy the minimum contacts requirement, the defendant itself must have purposefully directed its activities toward South Carolina residents, and the cause of action must arise out of or relate to those activities, such that the defendant could reasonably anticipate being haled into court here. *Ormand-Ward by & through CDM Corp. v. Litt*, 447 S.C. 341, 358, 926 S.E.2d 259, 268 (Ct. App. 2025) (rehearing denied March 13, 2026).

Plaintiff's Amended Complaint is devoid of any allegations that Mandarich acted directly or indirectly to avail itself of the benefits and protections granted by the laws of South Carolina. Plaintiff's Amended Complaint is also devoid of any allegations that Mandarich has a continuing relationship or obligations (minimum contacts) which would subject Mandarich to the jurisdiction of this Court. Plaintiff filed an opposition to the motion but did not offer any evidence which cured these pleading defects. Accordingly, the Court finds that it lacks personal jurisdiction over Mandarich. Because it lacks personal jurisdiction, the Court does not reach the question of whether Plaintiff sufficiently stated a claim against Mandarich.

Mandarich's relationship with Plaintiff, the underlying debt, and the Illinois judgment all arose in Illinois, and the evidence before the Court shows Mandarich's only collection activity, the garnishment, was directed to Plaintiff's employer's corporate address in Maryland, not South Carolina. Plaintiff's decision to leave Georgia and work in South Carolina cannot be attributed to Mandarich as a contact with this forum. *Abdulla*, 439 S.C. at 403, 887 S.E.2d at 144; *S. Plastics Co.*, 310 S.C. at 261-62, 423 S.E.2d at 131-32.

Nor is general jurisdiction available. General jurisdiction requires that the defendant be domiciled in, organized under the laws of, or maintain its principal place of business in South Carolina, or otherwise have continuous and systematic contacts with the state sufficient to render

it essentially "at home" here. S.C. Code Ann. § 36-2-802. Mandarich is an Illinois law firm with no offices, no attorneys licensed in South Carolina, and no business operations in this state, and it therefore is not subject to general jurisdiction here.

WHEREFORE, the Court hereby GRANTS Defendant Mandarich Law Group, LLP's Motion to Dismiss for a lack of personal jurisdiction and DISMISSES the claims against Defendant Mandarich Law Group, LLP WITHOUT PREJUDICE.

IT IS SO ORDERED.

Edgefield, SC
September 14, 2026

The Hon. Vernon F. Dunbar
Circuit Court Judge, Presiding



Edgefield Common Pleas

Case Caption: Camelia Socite VS Mandarich Law Group, LLP et al , defendant, et al
Case Number: 2025CP1900353
Type: Order/Dismissal

So Ordered

Vernon F. Dunbar

Electronically signed on 2026-09-21 11:28:30 page 4 of 4

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