

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2010180087

Laurance H. Davis, Jr., Marvin D. McCarthy, James W.
Ivey, and Erin E. Ivey, individually and in their
capacities as the Limited Partners of Palmetto Apartments,
a South Carolina Limited Partnership, ... Appellants,

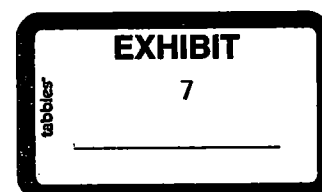
v.

Palmetto Apartments, a South Carolina Limited Partnership,
Apartment Investment and Management Company a/k/a
AIMCO, Insignia Financial Group, Inc., AmReal Corporation
a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation, ISTC Corporation, N. Barton Tuck, Jr., and John
Doe, a generic designation for a party or parties whose true
identity is unknown, ... Respondents.

AFFIDAVIT OF HUGH G. CRADDOCK IN SUPPORT OF REPLY
MEMORANDUM IN SUPPORT OF RESPONDENTS' MOTION TO DISMISS

Personally appeared before me, Hugh G. Craddock, who, being duly sworn,
deposes and states as follows:

1 My name is Hugh G. Craddock. I am over the age of 18 years and am competent
to testify to the matters contained herein based upon personal knowledge. I submit this Affidavit



in support of the Reply Memorandum in Support of Respondents' Motion to Dismiss in the above-captioned appeal.

2 I am a resident and citizen of the County of Greenville and State of South Carolina.

3 I am a paralegal and have been practicing as such in the State of South Carolina since 1990. I am employed by the law firm of Haynsworth Sinkler Boyd, P.A. located in Greenville, South Carolina. Haynsworth Sinkler Boyd, P.A. represents the Respondents in the above-captioned case.

4 I make this affidavit based upon my own personal knowledge.

5 On September 20, 2010, I received a copy of Judge Early's September 16, 2010 letter to the Clerks of Court in Beaufort, Charleston and Orangeburg counties asking each clerk to file the Order denying Plaintiffs' Motion seeking reconsideration of the Court's Order dated April 6, 2010. A copy of the letters and the enclosed Order is attached hereto as **Exhibit A**.

6 On September 30, 2010, I received a copy of the Notice of Entry of Judgment/Order Pursuant to Rule 77 SCRPC from Charleston County. The Notice states "You may view and download this document at www3.Charlestoncounty.org" and is attached hereto as **Exhibit B**.

7 On September 30, 2010, I went to the publically available South Carolina Judicial Department website and obtained a copy of the signed Order by following the case records search links to Charleston County Courts as referenced above (a printed copy of the complete docket, which I viewed at the website, attached hereto as **Exhibit C**).

8 After downloading a copy of the signed Order from Charleston County, I again went to the publically available South Carolina Judicial Department website and confirmed that

the signed September 16, 2010 Order had been recorded, and was showing as such, in both Beaufort County and Orangeburg County, according to the online dockets. I can not recall the exact date that I confirmed this, but I am certain it was no later than seven (7) days after receipt of the September 30, 2010 notice of entry of the Order from Charleston County.

9 The Beaufort County website showed that the Order was signed on September 16, 2010 and entered on September 20, 2010 in the Parkview (a printed copy of the complete docket, which I reviewed at the website, is attached hereto as **Exhibit D**), Palmetto (a printed copy of the complete docket, which I viewed at the website, is attached hereto as **Exhibit E**) and Pinewood cases (a printed copy of the complete docket, which I viewed at the website, is attached hereto as **Exhibit F**).

10 The Orangeburg County website showed that the subject Order was entered on September 20, 2010 (a printed copy of the complete docket, which I viewed at the website, is attached hereto as **Exhibit G**).

11 I have also **reviewed the Beaufort, Charleston and Orangeburg County case dockets which are available online** to confirm the filing and docketing of the following Orders and related Motions regarding the five subject cases. The online dockets showed as follows:

- The December 17, 2008 Order Denying Plaintiffs' Motion to Compel No. 2 was entered by the Beaufort County clerk on December 23, 2008, the Charleston County clerk on December 31, 2008 and the Orangeburg County clerk on January 5, 2009. There is no record of notice of entry of the Order sent by any clerk in the online dockets. See **Exhibits C - G**;

- Plaintiffs served a single Motion to Alter or Amend (regarding the December 17, 2008 Order) for all five cases on December 30, 2008. A copy of the proof of service is attached hereto as **Exhibit H**;
- The December 30, 2008 Order Appointing the Honorable Gary E. Clary as Special Master for Resolution of Specified Discovery Disputes was entered by the Beaufort County clerk on January 6, 2009, the Orangeburg County clerk on January 8, 2009, and the Charleston County clerk on January 12, 2009. There is no record of notice of entry of the Order sent by any clerk in the online dockets. See **Exhibits C - G**;
- Plaintiffs served a single Motion to Alter or Amend (regarding the December 30, 2008 Order) for all five cases on January 13, 2009. A copy of the proof of service is attached hereto as **Exhibit I**;
- The March 3, 2009 Order Granting in Part and Denying in Part Plaintiffs' Motion to Compel, Dated July 29, 2005 was entered by the Beaufort County clerk on March 9, 2009 and the Orangeburg County clerk on March 17, 2009. There is no record of notice of entry of Order sent by any clerk in the online dockets. See **Exhibits D - G**;
- Plaintiffs served a single Motion to Alter or Amend (regarding the March 3, 2009 Order) for all five cases dated March 13, 2009. A copy of the proof of service is attached hereto as **Exhibit J**;
- The March 3, 2009 Order Granting Defendants' Motion to Compel, Dated November 6, 2008 was entered by the Beaufort County clerk on March 10, 2009 and the Charleston County Clerk on March 16, 2009. The Charleston County clerk sent notice of entry of Order to the parties on March 20, 2009. There is no record of

notice of entry of Order sent by the Beaufort or Orangeburg County clerks. See **Exhibits C - F**;

- Plaintiffs served a single Motion to Alter or Amend (regarding the March 3, 2009 Order identified immediately above) for all five cases on March 13, 2009. A copy of the proof of service is attached hereto as **Exhibit K**;
- The March 9, 2009 Order (Granting Motion to Continue the Trial) was entered by the Beaufort County clerk on March 16, 2009, the Charleston County clerk on March, 19, 2009 and the Orangeburg County clerk on March 20, 2009. The Charleston County Clerk sent notice of the entry of Order to the parties on March 24, 2009. There is no record of notice of entry of Order sent by the Beaufort or Orangeburg County clerks. See **Exhibits C - G**;
- Plaintiffs served a single Motion to Alter or Amend (regarding the March 9, 2009 Order) for all five cases on March 23, 2009. A copy of the proof of service is attached hereto as **Exhibit L**;
- The June 2, 2009 Order Adopting Findings and Conclusions of Special Master Clary was entered by the Beaufort County clerk on June 4, 2009. There is no record of notice of entry of Order sent by any clerk. See **Exhibit D**;
- Plaintiffs served a single Motion to Alter or Amend (regarding the June 2, 2009 Order) for all five cases on June 11, 2009. A copy of the proof of service is attached hereto as **Exhibit M**;
- The July 28, 2009 Order Amending Court's Order Dated June 2, 2009 was entered by the Beaufort County clerk on August 3, 2009 and the Orangeburg and Charleston County clerks on August 6, 2009. The Charleston County clerk sent notice of entry

- of Order to the parties on August 12, 2009. There is no record of notice of entry of Order sent by Beaufort or Orangeburg County clerks. See **Exhibits C - G**;
- Plaintiffs served a single Notice of Appeal (regarding the July 28, 2009 Order) for all five cases on September 10, 2009. A copy of the proof of service is attached hereto as **Exhibit N**;
 - The April 6, 2010 Order Granting Defendants' Two Motions for Sanctions, Finding Plaintiffs in Contempt of Court, and Dismissing the Above-Captioned Actions as Sanctions for Plaintiffs' Contempt was entered by the Orangeburg County clerk on April 8, 2010 and the Beaufort and Charleston County clerks on April 9, 2010; The Beaufort County clerk sent notice of entry of Order to the parties on April 12, 2010. A copy of the Beaufort County notices are attached hereto as **Exhibit O**; The Charleston County clerk sent notice of entry of Order to the parties on April 15, 2010. There is no record of notice of entry of Order by the Orangeburg County clerk. See **Exhibits C - G**;
 - Plaintiffs served a single Motion for Reconsideration, Alteration or Amendment (Regarding the April 6, 2010 Order) for all five cases on April 22, 2010. A copy of the proof of service is attached hereto as **Exhibit P**;
 - The October 7, 2010 Order (Denying Plaintiffs' Second Recusal Motion) was entered by the Charleston and Orangeburg County clerks on October 8, 2010 and the Beaufort County clerk on October 11, 2010. The Charleston County clerk sent notice of entry of Order to the parties on October 15, 2010. There is no record of notice of entry of Order sent by Beaufort or Orangeburg County clerks. See **Exhibits C - G**;

- Plaintiffs served a Motion to Alter or Amend (regarding the October 7, 2010 Order) in the Orleans matter on October 28, 2010. A copy of the proof of service is attached hereto as **Exhibit Q**. Plaintiffs' served an Amended Motion to Alter or Amend (regarding the October 7, 2010 Order) in the Orleans matter on November 8, 2010. A copy of the proof of service is attached as **Exhibit R**;
- October 22, 2010 Order Denying Plaintiffs' Motion for Protective Order was entered by the Beaufort and Orangeburg County clerks on October 25, 2010 and the Charleston County clerk on October 27, 2010. The Charleston County clerk sent notice of entry of Order to the parties on November 4, 2010. There is no record of notice of entry of Order sent by Beaufort or Orangeburg County clerks. See **Exhibits C - G**;
- Plaintiffs served five Motions to Alter or Amend (regarding the October 22, 2010 Order) captioned individually for all five cases on November 8, 2010. A copy of the proofs of service for each motion are attached hereto as **Exhibit S**;
- September 16, 2010 Order (Denying Motion for Reconsideration of the Court's Order dated April 6, 2010) was entered by Beaufort, Orangeburg and Charleston County clerks on September 20, 2010. The Charleston County clerk sent notice of entry of Order to the parties on September 28, 2010. There is no record of notice of entry of Order sent by Beaufort or Orangeburg County clerks. See **Exhibits C - G**; and
- Plaintiffs served the Notice of Appeal for Orleans on October 28, 2010 and the Amended Notice of Appeal for Orleans on November 8, 2010. A copy of the Proofs of service are attached as **Exhibit T**. Plaintiff's served the Notice of Appeal for

Pinewood, Parkview, Palmetto and Roosevelt on December 3, 2010. A copy of the proofs of service are attached as **Exhibit U**.

12 From a review of the County Dockets, the Plaintiffs have not received notice of entry of Order from each, Beaufort, Orangeburg and Charleston County, for any individual Order mentioned above. If notice was issued by a clerk, it was most often issued by Charleston County.

Further, Affiant sayeth not.



Hugh G. Craddock

Subscribed and sworn to me
This 8th day of February, 2011



Notary Public of South Carolina
My Commission expires on 11/23/19
#783350v3

10-11-61



State of South Carolina
The Circuit Court of the Second Judicial Circuit

Doyet A. Early, III
Judge

Post Office Box 90
Bamberg, SC 29003
Phone: (803) 245-4004
Fax: (803) 245-2983
dearlyl@sccourts.org

September 16, 2010

The Honorable Jeri Ann Roseneau
Post Office Box 1128
Beaufort, South Carolina 29901-1128

Re: Laurance H. Davis, Jr. et al v. Parkview Apartments, 03-CP-07-726
Laurance H. Davis, Jr. et al v. Palmetto Apartments, 05-CP-07-1989
Carolina Management Corp of Beaufort, et al v. Pinewood Park Apartments, 05-CP-07-1990

Dear Ms. Roseneau:

Please find enclosed for filing my orders in the above cases. Please file and serve all interested parties.

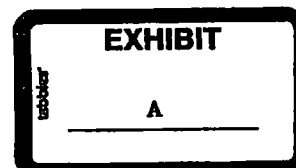
Sincerely,


D. A. Early, III

DAE:khc

Enclosures

cc: Joel Bailey, Esquire
Ellis Johnston, Esquire ✓
Thomas Pendarvis, Esquire



Haynsworth Sinkler Boyd, P.A.

Date Rec'd 9/20/10

C/M # 11471.0010

Docketed MLS

Re: SMJ, CTU, BEL



State of South Carolina
The Circuit Court of the Second Judicial Circuit

Doyet A. Early, III
Judge

Post Office Box 90
Bamberg, SC 29003
Phone: (803) 245-4004
Fax: (803) 245-2983
dearlyj@sccourts.org

September 16, 2010

The Honorable Winnifa Brown-Clark
Post Office Box 9000
Orangeburg, South Carolina 29115

Re: Lurance H. Davis, Jr. et al v. Roosevelt Gardens, 05-CP-38-1131

Dear Ms. Clark:

Please find enclosed for filing my order in the above case. Please file and serve all interested parties.

Sincerely,


D. A. Early, III

DAE:khc

Enclosure

cc: Joel Bailey, Esquire
Ellis Johnston, Esquire ✓
Thomas Pendarvis, Esquire

Mayrsworth Sinkler Boyd, RA.
Date Rec'd 9/20/10
C/M # 11471.0010
Docketed MLS
IDL ENT, CTU, BEL



State of South Carolina
The Circuit Court of the Second Judicial Circuit

Doyet A. Early, III
Judge

Post Office Box 90
Bamberg, SC 29003
Phone: (803) 245-4004
Fax: (803) 245-2983
dearlyj@sccourts.org

September 16, 2010

The Honorable Julie J. Armstrong
100 Broad Street Suite 106
Charleston, South Carolina 29401-2258

Re: Rhonda G. Rentz, et al v. Orleans Gardens, 05-CP-10-4229

Dear Ms. Armstrong:

Please find enclosed for filing my order in the above case. Please file and serve all interested parties.

Sincerely,


D. A. Early, III

DAE:khc
Enclosure

cc: Joel Bailey, Esquire ✓
Ellis Johnston, Esquire ✓
Thomas Pendarvis, Esquire

Haynuworth Sinkler Boyd, RA.
Date Rec'd 9/20/10
C/M # 11471-0010
Docketed ALS
IDL EMJ, CTU, BEL

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.

Parkview Apartments, a South Carolina
Limited Partnership, *et al.*, Defendants.

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.

Roosevelt Gardens, a South Carolina
Limited Partnership, *et al.*, Defendants.

Rhonda G. Rentz, *et al.*, Plaintiffs,
v.

Orleans Gardens, a South Carolina
Limited Partnership, *et al.*, Defendants.

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.

Palmetto Apartments, a South Carolina
Limited Partnership, *et al.*, Defendants.

Carolina Management Corporation of
Beaufort, *et al.*, Plaintiffs,
v.

Pinewood Park Apartments, a South Carolina
Limited Partnership, *et al.*, Defendants.

Beaufort County
C.A. No. 2003-CP-07-726

Orangeburg County
C.A. No. 2005-CP-38-1131

Charleston County
C.A. No. 2005-CP-10-4229

Beaufort County
C.A. No. 2005-CP-07-1989

Beaufort County
C.A. No. 2005-CP-07-1990

ORDER

Plaintiffs have filed a motion seeking reconsideration of this court's order dated April 6, 2010, pursuant to Rule 59, SCRPC. The order was signed after Plaintiffs repeatedly failed to comply with orders dealing with discovery dated March 3, 2009 and July 28, 2009. Each of those orders have resulted from numerous hearings, motions, memoranda, arguments and rulings, including rulings denying Plaintiff's Rule 59/60 motions seeking reconsideration of these orders.


#1

The court has carefully reconsidered all of Plaintiff's arguments in support of their motion, revisited all prior orders and the cases, memoranda and exhibits presented at each hearing; the court is still of the opinion that the previous orders were a correct application of the law to this factual matter.

Therefore Plaintiff's motion is DENIED.

IT IS SO ORDERED.



The Honorable Doyet A. Early, III

Sept 16, 2010
Beaufort, South Carolina

JULIE J. ARMSTRONG
CLERK OF COURT, C.P. & G.S.
100 BROAD STREET, SUITE 106
CHARLESTON, SC 29401-2238
RETURN SERVICE REQUESTED



www3.charlestoncounty.org



15



VICK, CALVIN THEODORE JR
PO BOX 2048
GREENVILLE SC 29602-2048

NOTICE OF ENTRY OF JUDGMENT/ORDER PURSUANT TO RULE 77 SCRPC
ORDER - ORDER DENYING PLNTFFS' MOTION FOR RECONSIDERATION

THIS JUDGMENT WAS ENTERED ON THE 20TH DAY OF SEPTEMBER, 2010 AND A COPY MAILED
FIRST-CLASS THIS 28TH DAY OF SEPTEMBER, 2010 TO ALL COUNSEL OF RECORD AND/OR
ALL PERSONS ENTITLED TO RECEIVE NOTICE.
YOU MAY VIEW AND DOWNLOAD THIS DOCUMENT AT WWW3.CHARLESTONCOUNTY.ORG

VICK, CALVIN THEODORE JR
PO BOX 2048
GREENVILLE SC 29602-2048

2005-CP-10-004229
RENTZ, RHODA G ETAL ETC
VS.
ORLEANS GARDENS ETAL ETC

EXHIBIT

B

Haynsworth Sinkler Boyd, P.A.

Date Rec'd 9/30/10

C/M # 11471.0010

Docketed

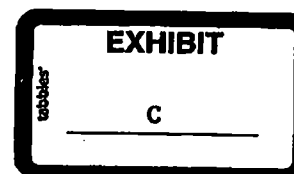
MDL CTV, ELJ, AGC, SL, HUS

CHARLESTON COUNTY**COMMON PLEAS****CIVIL ACTION DOCKET AS OF 01/31/2011****PLAINTIFF(S):** RENTZ, RHODA G ETAL ETC**-VS-****DEFENDANT(S):** ORLEANS GARDENS ETAL ETC**CASE ID:** 2005-CP-10-004229**FILING:** 10/17/2005**ACTION:** CONTRACT-BREACH OF CONTRACT**JUDGE:** DOYET A. EARLY

GROUP	TYPE	PARTY NAME	PHONE
001	AT	BAILEY, JOEL D P O BOX 1437 BEAUFORT SC 29901 FAX: (843) 000-0000	(843) 524-7600
001	PL	RENTZ, RHODA G ETAL ETC	
002	AT	JOHNSTON, ELLIS M II PO BOX 2048 GREENVILLE SC 29602	(803) 240-3200
002	DF	ORLEANS GARDENS ETAL ETC	
003	PL	PIKE, MARY JANE ETAL ETC	
004	PL	REYNOLDS, EVA MARIE ETAL ETC	
005	PL	MERCY, JOANNE O ETAL ETC	
006	PL	LIMITED PARTNERS OF ORLEANS GARDENS ETAL	
007	DF	APARTMENT INVESTMENT AND MANAGEMENT COMPANY ETAL	
008	AT	VICK, CALVIN THEODORE JR POST OFFICE BOX 2048 GREENVILLE SC 29602	(864) 240-3200
008	DF	AIMCO ETAL ETC	
009	DF	INSIGNIA FINANCIAL GROUP INC ETAL ETC	
010	DF	AMREAL CORPORATION ETAL ETC	
011	DF	USS CORPORATION ETAL ETC	
012	DF	U S SHELTER CORPORATION ETAL ETC	
013	DF	ISTC CORPORATION ETAL ETC	
014	DF	TUCK, N BARTON ETAL ETC	
015	DF	DOE, JOHN ETAL ETC	
016	AT	PENDARVIS, THOMAS A 500 CARTERET STREET SUITE A BEAUFORT SC 29902 FAX: (843) 524-9501	(843) 524-9500

DATE	***** EVENTS IN CASE *****
JUN 06 2008	MOTION HEARING/MOTION DOCKET
OCT 21 2010	MOTION HEARING/MOTION DOCKET
DEC 10 2010	MOTION HEARING/MOTION DOCKET

DATE	**** PROPERTY IN CASE ****
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DATE	***** PROGRESS IN CASE *****	FZES
DEC 31 2010	FORM4 IN RE:ORDER 20101217 9990 MAILED FIRST CLASS	
DEC 17 2010	ORDER-PLNTFF'S MOT TO ALTER OR AMEND ORDER DENYING PLNTFF'S MOT FOR PROTECTIVE ORDER & THE ORDER DENYING PLNTFF'S MOT FOR RECUSAL HAVE BEEN DENIED	
DEC 02 2010	DEFNTS' MEMO IN OPPOSITION TO PLNTFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLNTFF'S MOTION FOR A PROTECTIVE ORDER & CERT/SERV	
NOV 12 2010	AS TO PENDARVIS, T (20) PLNTFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLNTFFS' MOTION FOR A PROTECTIVE ORDER & CERT/SERV	
NOV 10 2010	AMENDED NOTICE OF APPEAL-APPEALLING CERTAIN ORDERS BY JUDGE EARLY & PROOF OF SERVICE	
NOV 10 2010	CERTIFICATE OF SERVICE	
NOV 10 2010	AS TO PENDARVIS, T PLNTFFS' AMENDED & SUPPLEMENTAL MOT TO ALTER OR AMEND ORDER DENYING PLNTFFS' MOT FOR RECUSAL	
NOV 10 2010	CASE NOTES: CASE ASSIGNED TO JUDGE EARLY	
NOV 05 2010	AS TO PENDARVIS, T (20) PLNTFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLNTFFS' MOTION FOR RECUSAL & CERT/SERV	
NOV 04 2010	FORM4 IN RE:ORDER 20101027 9990 MAILED FIRST CLASS	
NOV 01 2010	NOTICE OF APPEAL-APPEALLING CERTAIN ORDERS BY JUDGE EARLY & PROOF OF SERVICE	
OCT 27 2010	ORDER DENYING PLNTFFS' MOTION FOR PROTECTIVE ORDER	
OCT 15 2010	FORM4 IN RE:ORDER 20101008 9990 MAILED FIRST CLASS	
OCT 08 2010	ORDER-PLNTFFS' 2ND RECUSAL MOT IS DENIED	
SEP 28 2010	FORM4 IN RE:ORDER 20100920 9990 MAILED FIRST CLASS	
SEP 20 2010	ORDER DENYING PLNTFFS' MOTION FOR RECONSIDERATION	
JUN 21 2010	DEFNTS' MEMO IN OPPOSITION TO PLNTFFS' MOTION FOR RECONSIDERATION, ALTERATION OR AMENDMENT OF THE CRT'S 4/6/2010 ORDER GRANTING SANCTIONS & CERT/SERV	
JUN 21 2010	AFFIDAVIT OF ELLIS M JOHNSTON II & CERT/SERV	
JUN 21 2010	AFFIDAVIT OF CALVIN T VICK JR	
JUN 08 2010	LETTER FR/ ATTY C VICK IN RE: AFFIDAVIT OF CALVIN T VICK JR	
JUN 08 2010	LETTER FR/ ATTY C VICK IN RE: AFFIDAVIT OF ELLIS M JOHNSTON II	
JUN 08 2010	LETTER FR/ ATTY C VICK IN RE: DEFNTS' MEMO IN OPPOSITION TO PLNTFFS' MOTION FOR RECONSIDERATION, ALTERATION OR	

AMENDMENT OF THE COURT'S APRIL 6, 2010 ORDER GRANTING SANCTIONS
MAY 20 2010
FORM4 IN RE:ORPRO 20100513 9990 MAILED FIRST CLASS
MAY 13 2010
ORDER OF PROTECTION
MAY 07 2010
AFFIDAVIT IN OPPOSITION TO AFFIDAVIT OF DEFNTS'
COUNSEL SUBMITTED IN SUPPORT OF ORDER AWARDING ATTORNEY FEES &
COSTS
MAY 06 2010
LETTER FROM ATTY CALVIN VICK JR
APR 29 2010
AFFIDAVIT OF ELLIS M JOHNSTON II
APR 29 2010
AFFIDAVIT OF ERIC HILTY
APR 29 2010 AS TO JOHNSTON, E
MOTION TO STRIKE & MEMO IN OPPOSITION TO PLNTFFS'
MOTION FOR RECUSAL & FOR VACATION OF PRIOR ORDERS
APR 29 2010
AFFIDAVIT OF ELLIS M JOHNSTON II & CERT/SERV
APR 26 2010
AFFIDAVIT OF THOMAS A PENDARVIS & CERT/SERV
APR 26 2010 AS TO BAILEY, J (1 HR)
NOT/MOT FOR RECONSIDERATION, ALTERATION, OR
AMENDMENT
APR 26 2010
CERTIFICATE OF SERVICE
APR 23 2010
AFFIDAVIT OF ELLIS JOHNSTON II
APR 19 2010
AFFIDAVIT OF EVA MARIE REYNOLDS
APR 15 2010
FORM4 IN RE:ORDER 20100409 9990 MAILED FIRST CLASS
APR 12 2010
AFFIDAVIT OF JOEL D BAILEY
APR 12 2010
AFFIDAVIT OF LAURANCE H DAVIS JR
APR 12 2010
AFFIDAVIT OF RHODA G RENTZ
APR 12 2010
AFFIDAVIT OF MARY JANE PIKE
APR 09 2010
ORDER GRANTING DEFNTS TWO MOTIONS FOR SANCTIONS,
FINDING PLNTFFS IN CONTEMPT OF CRT, & DISMISSING THE ABOVE
CAPTIONED ACTIONS AS SANCTIONS FOR PLNTFFS' CNTEMPT
MAR 30 2010
AFFIDAVIT OF JOEL D BAILEY
MAR 30 2010 AS TO BAILEY, J (1 HR)
NOT/MOT FOR RECUSAL & FOR VACATION OF PRIOR ORDERS
MAR 19 2010
DEFNTS' SURREPLY TO PLNFFS' REPLY TO DEFNTS' MEMO
IN OPPOSITION TO PLNTFFS' MOTION FOR DISCLOSURE & DISCOVERY &
CERT/SERV
MAR 10 2010
DEFNTS' MEMO IN OPPOSITION TO PLNTFFS' MOTION
FOR DISCLOSURE & DISCOVERY & CERT/MAILING
MAR 10 2010
DEFNTS' MEMO OPPOSING PLNTFFS' MOTION FOR
PROTECTIVE ORDER & CERT/MAILING

MAR 08 2010
PLNTFFS' REPLY MEMO IN SUPPORT OF MOTION FOR
DISCLOSURE & DISCOVERY & CERT/SERV

MAR 08 2010
LETTER FROM ATTY ELLIS JOHNSTON II IN RE; DEFNTS'
SURREPLY TO PLNTFFS' REPLY TO DEFNTS' MEMO

MAR 02 2010
LETTER FROM ATTY ELLIS JOHNSTON II IN RE: MEMO (2)

MAR 01 2010
DEFNTS' SUPPLEMENTAL MEMO IN SUPPORT OF THEIR
MOTION FOR SANCTIONS, & IN OPPOSITION TO PLNTFFS' RULE 60(B)
MOTIONS, RE: PRIVILEGE DISCOVERY ORDER & CERT/SERV

FEB 22 2010
DEFNTS' 2ND SUPPLEMENTAL MEMO IN SUPPORT OF MOTION
FOR SANCTIONS RE: GENERAL DISCOVERY ORDER & CERT/SERV

FEB 22 2010 AS TO BAILEY, J (1 HR)
PLNTFFS' MOTION FOR PROTECTIVE ORDER

FEB 22 2010 AS TO BAILEY, J (1 HR)
PLNTFFS' MOTION FOR DISCLOSURE & DISCOVERY

FEB 17 2010
LETTER FROM ATTY CALVIN VICK JR IN REFERENCE
TO DEFNTS SUPPLEMENTAL MEMO

FEB 16 2010
LETTER FROM ATTY E JOHNSTON IN RE: DEFNTS' 2ND
SUPPLEMENTAL MEMO IN SUPPORT OF MOTION FOR SANCTIONS

FEB 01 2010 AS TO PENDARVIS, T (30)
PLNTFFS' MOTION FOR RELIEF FROM JULY 28, 2009
ORDER AMENDED COURT'S ORDER DATED JUNE 2, 2009 & CERT/SERV

JAN 21 2010
FORM4 IN RE:ORDER 20100114 9990 MAILED FIRST CLASS

JAN 14 2010
CONSENT ORDER GRANTING DEFNTS' MOTION FOR
CONTINUANCE

JAN 04 2010 AS TO VICK, C
DEFNTS' MOTION FOR CONTINUANCE & CERT/SERV

DEC 22 2009
REMITTITUR APPEAL IS REMITTED

DEC 21 2009
MISCELLANEOUS DOCUMENTS

DEC 03 2009
LETTER FROM CRT OF APPEALS-RESPONDENTS' MOTION
TO DISMISS APPEAL IS GRANTED

SEP 23 2009
FORM4 IN RE:ORDER 20090911 9990 MAILED FIRST CLASS

SEP 16 2009
NOTICE OF APPEAL-APPELLING THE ORDER AMENDING
COURT'S ORDER DATED JUNE 2, 2009 & PROOF OF SERVICE

SEP 11 2009
ORDER GRANTING DEFNTS MOTION TO SEAL (SEALED
DOCUMENTS IN LOCKED CABINET) & CERT/SERV

SEP 08 2009
SUPPLEMENTAL MEMO IN SUPPORT OF DEFNTS' MOTIONS
FOR SANCTIONS & CERT/SERV

SEP 03 2009
LETTER FR/ ATTY VICK IN RE: ORDER GRANTING DEFNTS'
MOTION TO SEAL

AUG 31 2009
MEMO IN SUPPORT OF DEFNTS' TWO MOTIONS FOR
SANCTIONS & CERT/SERV

AUG 28 2009
LETTER FR/ ATTY VICK IN RE: SUPPLEMENTAL MEMO IN
SUPPORT OF DEFNTS' MOTIONS FOR SANCTIONS

AUG 24 2009
LETTER FR/ ATTY VICK IN RE: MEMO IN SUPPORT OF TWO
MOTIONS FOR SANCTIONS

AUG 20 2009 AS TO JOHNSTON, E (30)
DEFNTS' 2ND MOTION FOR SANCTIONS & CERT/SERV

AUG 12 2009
LETTER FROM ATTY VICK TO MS SMITH

AUG 12 2009
FORM4 IN RE:ORDER 20090806 9980 MAILED FIRST CLASS

AUG 06 2009
ORDER AMENDING COURT'S ORDER & CERT/SERV

AUG 06 2009 AS TO JOHNSTON, E
DEFNTS' MOTION FOR SANCTIONS & CERT/SERV

AUG 03 2009 AS TO VICK, C
MOTION TO SEAL & CERT/SERV

JUL 31 2009
LETTER FR/ ATTY VICK TO MS SMITH IN RE: COPIES OF
AMENDED ORDER

JUL 10 2009
MEMO IN SUPPORT OF DEFNTS MOTION TO ALTER OR AMEND
ORDER & CERT/SERV

JUL 06 2009
MEMO IN SUPPORT OF MOTION TO ALTER OR AMEND ORDER
ADOPTING FINDINGS AND CONCLUSIONS OF SPECIAL MASTER CLARY DATED
06/02/09 & CERT/SERV

JUN 24 2009 AS TO VICK, C (1 HR)
MOTION TO ALTER OR AMEND ORDER & CERT/SERV

JUN 17 2009
LETTER FR/ C VICK TO BEAUFORT CLERK IN RE: COPIES

JUN 15 2009 AS TO PENDARVIS, T (15)
MOTION TO ALTER OR AMEND ORDER ADOPTING FINDINGS
AND CONCLUSIONS OF SPECIAL MASTER CLARY & CERT/SERV

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MAY 22 2009
ORDER OF PROTECTION

APR 28 2009
FORM4 IN RE:ORDER 20090420 9990 MAILED FIRST CLASS

APR 20 2009
ORDER REGARDING SCOPE OF AUTHORITY FOR SPECIAL
MATTER & CERT/SERV

APR 15 2009
LETTER FR/ HUGH CRADDOCK IN RE: ORDER REGARDING
SCOPE OF AUTHORITY FOR SPECIAL MASTER

APR 13 2009
DEFNTS' MEMO IN OPPOSITION TO PLNTFFS' MOTION TO
ALTER OR AMEND ORDER GRANTING DEFNTS' MOTION TO COMPEL, DATED
NOVEMBER 6, 2008 & CERT/SERV

APR 06 2009
LETTER FR/ HUGH CRADDOCK IN RE: MEMO IN OPPOSITION
TO MOTION TO ALTER OR AMEND

MAR 24 2009
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MAR 20 2009
FORM4 IN RE:ORDER 20090316 9990 MAILED FIRST CLASS

MAR 19 2009

ORDER-DAVIS V PARKVEIW APTS IS CONTINUED
MAR 16 2009 AS TO PENDARVIS, T (15)
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DEFNTS' MOTION TO COMPEL & CERT/SERV
MAR 16 2009
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MAR 13 2009
LETTER FR/ H CRADDOCK TO BEAUFORT CLERK OF COURT
MAR 09 2009
LETTER FR/ ATTY CRADDOCK TO BEAUFORT CLERK OF CRT
IN RE: ORDER GRANTING DEFNTS MOTION TO COMPEL
MAR 09 2009
LETTER FR/ ATTY CRADDOCK TO BEAUFORT CLERK OF CRT
IN RE: ORDER GRATING IN PART & DENYING IN PART PLTFFS MOTION TO
COMPEL
FEB 24 2009
FORM4 IN RE:ORDER 20090218 9990 MAILED FIRST CLASS
FEB 19 2009
DEFNTS' MEMO IN SUPPORT OF MOTION FOR PROTECTIVE
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FEB 19 2009
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TO ALTER OR AMEND & CERT/SERV
FEB 18 2009
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JAN 12 2009
ORDER APPOINTING THE HONORABLE GARY E CLARY AS
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JAN 02 2009
LETTER FR/ ATTY C VICK JR IN RE: ORDER APPOINTING
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DISCOVERY DISPUTES
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DEC 22 2008
LETTER FR/ ATTY C VICK JR IN RE: ORDER DENYING
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DEC 15 2008
DEFNTS' MEMO IN SUPPORT OF MOTION TO COMPEL
DISCOVERY RESPONSES FR/ ALL PLNTFFS IN ABOVE-CAPTIONED ACTIONS &
CERT/SERV
DEC 10 2008
LETTER FR/ ATTY C VICK JR IN RE: DEFNTS' MEMO IN
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DEC 02 2008
FORM4 IN RE:ORDER 20081124 9990 MAILED FIRST CLASS
NOV 24 2008
ORDER DENYING PLNTFF'S MOTION TO COMPEL #6
NOV 19 2008 AS TO JOHNSTON, E (30)
DEFNTS' MOTION TO COMPEL DISCOVERY RESPONSES FR/
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NOV 12 2008
LETTER FR/ ATTY VICK TO BEAUFORT CNTY
SEP 08 2008 AS TO JOHNSTON, E
DEFNTS MOTION F/ PROTECTIVE ORDER & CERT/SERV
JUL 09 2008

DEFNTS' BRIEF IN OPPOSITION TO PLNTFFS' MOTION TO
COMPEL #6 & CERT/SERV
JUL 09 2008
DEFNTS' BRIEF IN OPPOSITION TO PLNTFFS' MOTION TO
COMPEL #3, 4, & 5 & CERT/SERV
JUL 02 2008
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JUN 20 2008
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JUN 17 2008
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MAY 29 2008
LETTER FROM ATTY PENDARVIS IN RE:MOTIONS BEING
REMOVED
MAY 13 2008 AS TO VICK, C (30 MIN)
DEFNTS' MOT TO AMEND SCHEDULING ORDER & CERT/SERV
MAY 09 2008
FORM4 IN RE:ORDER 20080505 9990 MAILED FIRST CLASS
MAY 05 2008
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FEB 25 2008 AS TO PENDARVIS, T
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CRT/SRV
FEB 21 2008 AS TO JOHNSTON, E (30)
MOTION FOR PROTECTIVE ORDER & CRT/SRV
FEB 20 2008
LETTER FR/ ATTY C VICK IN RE: OF MOTION F/
PROTECTIVE ORDER FILED IN BEAUFORT CNTY
FEB 16 2008
FORM4 IN RE:ORDER 20080213 9990 MAILED FIRST CLASS
FEB 13 2008 AS TO JOHNSTON, E
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THE OUT OF STATE SUBPOENA TO THE MTB GROUP & CERT/SERV
FEB 13 2008
ORDER OF COMMISSION FOR OUT OF STATE SUBPOENA TO
THE MTB GROUP
JAN 02 2008 AS TO JOHNSTON, E
MOTION FOR ISSUANCE OF OUT OF STATE SUBPOENA &
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DEC 28 2007
AFFIDAVIT OF TOY S GLENNON
DEC 20 2007
CERTIFICATE OF SERVICE
DEC 12 2007 AS TO COMPEL PRODUCTION &
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NOV 29 2007
FORM4 IN RE:ORDER 20071127 9990 MAILED FIRST CLASS
NOV 27 2007
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NOV 14 2007 AS TO VICK, C
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NOV 02 2007
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FEB 27 2007
FORM4 IN RE:ORDER 20070222 9990 MAILED FIRST CLASS
FEB 22 2007

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OCT 05 2006
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OCT 03 2006
AFFIDAVIT OF GREGORY ADAMS
OCT 03 2006
AFFIDAVIT OF EVA MARIE REYNOLDS
SEP 22 2006
REPLY BRIEF
SEP 22 2006
AFFIDAVIT OF N BARTON TUCK JR & CRT/SRV
SEP 05 2006
COMBINED MEMO OF LAW IN OPPOSITION TO MOTIONS TO
DISMISS COUNT 1 THROUGH 7 & DEFNTS MOTIONS TO DISMISS FOR
IMPROPER VENUE OR IN THE ALTERNATIVE & CRT/SRV
AUG 08 2006
NOTICE OF FILING ORIGINAL DISCOVERY REQUESTS
& CRT/SRV
AUG 08 2006
BRIEF IN SUPPORT OF MOTIONS TO DISMISS OR IN THE
ALTERNATIVE FOR SUMMARY JUDGMENT
MAR 23 2006
FORM4 IN RE:ORDER 20060317 9990 MAILED FIRST CLASS
MAR 17 2006
ORDER FROM SUPREME CRT-JUDGE EARLY III IS
ASSIGNED TO HEAR & DECIDE ALL PRE TRIAL MOTIONS & OTHER MATTERS
PERTAINING TO THESES CASES ETC
MAR 03 2006
LETTER FR/ ATTY JOHNSTON IN RE: MOTIONS TO DISMISS
JAN 23 2006 AS TO JOHNSTON, E (1 HOUR)
MOTION TO DISMISS COUNTS 1 THROUGH 7
JAN 23 2006 AS TO JOHNSON, E
ANSWER OF CERTAIN DEFNTS
JAN 23 2006
AFFIDAVIT OF JOAN CHRIST & CRT/SRV
JAN 23 2006
AFFIDAVIT OF GARY HEDIGER
JAN 23 2006
AFFIDAVIT OF WILLIAM JARRAD
JAN 23 2006
AFFIDAVIT OF N BARTON TUCK JR
JAN 23 2006
AFFIDAVIT OF GEORGE BUCHANAN
JAN 23 2006
AFFIDAVIT OF DOUGLAS BROWN
JAN 23 2006
AFFIDAVIT OF ARTHUR HOWSON JR
JAN 23 2006 AS TO JOHNSON, E (1 HOUR)
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VENUE & MEMO IN SUPPORT
JAN 14 2006
FORM4 IN RE:ORDER 20060112 9980 MAILED FIRST CLASS
JAN 12 2006
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TO PLNTFFS CMPLNT
JAN 03 2006
CERTIFICATE OF SERVICE
JAN 03 2006 AS TO JOHNSTON, E

DEFNTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
IN WHICH TO FILE DEFNTS' ANSWER OR OTHERWISE RESPOND TO PLNTFFS'
CMPLNT WITH PLNTFFS' CONSENT

DEC 19 2005
AFFIDAVIT OF SERVICE (2)

NOV 08 2005
CERTIFICATE OF SERVICE(6)

OCT 17 2005
SUMMONS & COMPLAINT

OCT 17 2005
RECEIPT #05-13136

OCT 17 2005
PAID \$150.00

DOCKET TOTAL: .00



Beaufort County Fourteenth Circuit Public Index

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Laurance Davis Jr , plaintiff, et al VS AIMCO , defendant, et al

Case Number: 2003CP0700726

Court Beaufort County
Agency: Common Pleas

Filed Date: 04/22/2003

Case Type: Common Pleas

Case Sub Special-Comp/Oth
Type: 699

File Type: Jury

Status: Appeal

Assigned Judge: Early, Doyet A. III

Disposition: Ended by Non
Jury

Disposition Date 04/09/2010

Disposition Judge: Early, Doyet A. III

Original
Source Doc:

Original
Case #:

Judgment
Number:

[Parties](#) | [Judgments](#) | [Actions](#) | [Associated Cases](#) | [Tax Map Information](#)

Actions

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance Jr	Filing Fee -100	Filing	04/22/2003 - 00:00:00	04/22/2003 - 00:00:00
Davis, Laurance Jr	SUMMONS COMPLAINT	Filing	04/22/2003 - 00:00:00	04/22/2003 - 00:00:00
AIMCO	LETTER FOR EXTENSION OF TIME	Filing	05/12/2003 - 00:00:00	05/12/2003 - 00:00:00
Davis, Laurance Jr	AFF OFSER ON ISTC CORP ON	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00
Davis, Laurance Jr	AFF OF SER ON BARTON TUCK	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00
Davis, Laurance Jr	AFF OF SER ON PARVIEW APTS	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00
Davis, Laurance Jr	AFF OF SER ON AIMCO ON 4/28/03	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00
Davis, Laurance Jr	AFF OF SER ON AIMCO ON 4/28/03	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00
Davis, Laurance Jr	CERT OF SER ON PRENTICE HALL	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00

EXHIBIT

D

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance Jr	CERT OF SER ON AMREAL CORP C/O	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00
Davis, Laurance Jr	CERT OF SER ON SECRETARY OF	Filing	06/23/2003 - 00:00:00	06/23/2003 - 00:00:00
AIMCO	CONSENT OR DER TO EXTEND TIME	Filing	06/27/2003 - 00:00:00	06/27/2003 - 00:00:00
AIMCO	CONSENT ORDER TO EXTEND TIME	Filing	07/08/2003 - 00:00:00	07/08/2003 - 00:00:00
Davis, Laurance Jr	IN WHICH TO ANSWER, MOVE, OR	Filing	07/08/2003 - 00:00:00	07/08/2003 - 00:00:00
Davis, Laurance Jr	USS CORP, INSIGNA FINA TO	Filing	07/14/2003 - 00:00:00	07/14/2003 - 00:00:00
Davis, Laurance Jr	VENUE OR IN THE ALTER TRANSFER	Filing	07/14/2003 - 00:00:00	07/14/2003 - 00:00:00
Davis, Laurance Jr	TO STRIKE & IN ALTER TO MAKE	Filing	07/14/2003 - 00:00:00	07/14/2003 - 00:00:00
AIMCO	MOT & MEMO OF U.S. SHELTER COR	Filing	07/14/2003 - 00:00:00	07/14/2003 - 00:00:00
AIMCO	MOT TO DISMIS FOR IMPROPER	Filing	07/14/2003 - 00:00:00	07/14/2003 - 00:00:00
AIMCO	MOT & MEMO IN SUPPORT OF MOT	Filing	07/14/2003 - 00:00:00	07/14/2003 - 00:00:00
AIMCO	AFFIDAVT OF GEORGE BUCHANAN &	Filing	07/14/2003 - 00:00:00	07/14/2003 - 00:00:00
Davis, Laurance Jr	DISMISS(JOHNSTON)	Filing	07/14/2003 - 00:00:00	04/09/2010 - 00:00:00
Davis, Laurance Jr	DISMISS(JOHNSTON)	Filing	07/14/2003 - 00:00:00	04/09/2010 - 00:00:00
Davis, Laurance Jr	STRIKE(JOHNSTON)	Filing	07/14/2003 - 00:00:00	04/09/2010 - 00:00:00
Davis, Laurance Jr	AFFIDAVIT OF JOEL BAILEY	Filing	10/24/2003 - 00:00:00	10/24/2003 - 00:00:00
Davis, Laurance Jr	AFF OF SER OF S-C ON INSIGNIA	Filing	10/30/2003 - 00:00:00	10/30/2003 - 00:00:00
Davis, Laurance Jr	ORDER(JUDGE BUCKNER)	Filing	12/16/2003 - 00:00:00	12/16/2003 - 00:00:00
Parkview Apartments, A So	Filing of exhibits		12/16/2003 - 10:10:42	04/09/2010 - 10:10:42
AIMCO	ORDER ON MOT TO STRIKE OR IN	Filing	12/24/2003 - 00:00:00	12/24/2003 - 00:00:00
Davis, Laurance Jr	ALTER TO MAKE MORE DEFINATE &	Filing	12/24/2003 - 00:00:00	12/24/2003 - 00:00:00
Davis, Laurance Jr	MOTION TO ALTER OR AMEND ORDER	Filing	12/30/2003 - 00:00:00	12/30/2003 - 00:00:00
Davis, Laurance Jr	ALTER/AMEND(BUCKNER)	Filing	12/30/2003 - 00:00:00	04/09/2010 - 00:00:00
Davis, Laurance Jr	AMEND SUMMON-COMPLAINT	Filing	03/23/2004 - 00:00:00	03/23/2004 - 00:00:00
Davis, Laurance Jr	ORDER(BUCKNER)	Filing	04/01/2004 - 00:00:00	04/01/2004 - 00:00:00
Davis, Laurance Jr	& CER OF SER	Filing	04/13/2004 - 00:00:00	04/13/2004 - 00:00:00
AIMCO	MOT DISMISS COUNTS 1- 8/ANSWER	Filing	04/13/2004 - 00:00:00	04/13/2004 - 00:00:00
Davis, Laurance Jr	DISMISS COUNTS 1-	Filing	04/13/2004 -	04/09/2010 -

Name	Description	Action Type	Begin Date	Completion Date
	8(JOHNSTON)		00:00:00	00:00:00
Davis, Laurance Jr	SCHED ORDER-TRIAL ON/AFTER	Filing	08/18/2004 - 00:00:00	08/18/2004 - 00:00:00
Davis, Laurance Jr	MEMO IN SUPPRT OF DEF'S MOTION	Filing	10/05/2004 - 00:00:00	10/05/2004 - 00:00:00
Davis, Laurance Jr	THEIR MOTION TO DISMISS COUNTS	Filing	11/17/2004 - 00:00:00	11/17/2004 - 00:00:00
AIMCO	DEFS' REPLY BRIEF IN SUPP OF	Filing	11/17/2004 - 00:00:00	11/17/2004 - 00:00:00
AIMCO	CER SER(CLERK OF COURT & JOEL	Filing	11/17/2004 - 00:00:00	11/17/2004 - 00:00:00
AIMCO	ORDER DENYING MOTION TO DISMIS	Filing	02/11/2005 - 00:00:00	02/11/2005 - 00:00:00
Davis, Laurance Jr	EXCEPT AS TO PLAS' 3RD CAUSE	Filing	02/11/2005 - 00:00:00	02/11/2005 - 00:00:00
AIMCO	MOT TO COMPEL TO JOEL BAILEY	Filing	03/28/2005 - 00:00:00	03/28/2005 - 00:00:00
AIMCO	CER SER(JOEL D BAILEY)ON	Filing	03/28/2005 - 00:00:00	03/28/2005 - 00:00:00
Davis, Laurance Jr	TO COMPEL(E.M.JOHNSTON)	Filing	03/28/2005 - 00:00:00	04/09/2010 - 00:00:00
Davis, Laurance Jr	AMDED SCHDL ORD(GREGORY)	Filing	06/02/2005 - 00:00:00	06/02/2005 - 00:00:00
AIMCO	renewed motion compel	Filing	06/20/2005 - 00:00:00	06/20/2005 - 00:00:00
AIMCO	comsn(Gregory)Spr Ct Ga Issue Subp(Lend Lease	Filing	06/24/2005 - 00:00:00	06/24/2005 - 00:00:00
AIMCO	cnt:Corp & subsidiary)cer ser cncl rec usm 6/21/05	Filing	06/24/2005 - 00:00:00	06/24/2005 - 00:00:00
Davis, Laurance Jr	compel	Filing	06/27/2005 - 00:00:00	04/09/2010 - 00:00:00
Davis, Laurance Jr	compel	Filing	08/01/2005 - 00:00:00	08/09/2005 - 00:00:00
Davis, Laurance Jr	nom & motion compel	Filing	08/01/2005 - 00:00:00	08/01/2005 - 00:00:00
Davis, Laurance Jr	not of appearance(Thomas A.Pendarvis)	Filing	08/09/2005 - 00:00:00	08/09/2005 - 00:00:00
Davis, Laurance Jr	CP Jury Trial Docket	Event	07/01/2006 - 09:00:00	06/15/2006 - 17:00:00
Davis, Laurance Jr	CP Jury Trial Docket	Event	07/01/2006 - 10:00:00	04/09/2010 - 17:00:00
Davis, Laurance Jr	CP Jury Trial Docket	Event	12/31/2006 - 10:00:00	04/09/2010 - 17:00:00
Davis, Laurance Jr	Letter Regarding MTB Group Inc	Filing	11/01/2007 - 10:27:07	04/09/2010 - 10:27:07
Davis, Laurance Jr	Motion/Compel Production; Service	Motion	11/13/2007 - 09:22:43	03/06/2008 - 09:22:43
Parkview Apartments, A So	Def Brief In Opposition to Plf Motion to Compel Production &	Filing	11/26/2007 - 10:11:42	04/09/2010 - 10:11:42
Parkview Apartments, A So	Motion & order of commission for out of state subpoena/servi	Motion	12/28/2007 - 12:23:31	12/15/2009 - 12:23:31
Davis, Laurance Jr	CP Jury Trial Docket	Event	12/30/2007 - 10:00:00	09/11/2007 - 17:00:00
AIMCO	Motion/Protective Order & Cert of Service	Motion	02/21/2008 - 11:05:18	02/21/2008 - 11:05:18

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance Jr	Motion/Protective Order & to Quash Subpoenas & Cert of	Motion	02/25/2008 - 16:11:57	02/25/2008 - 16:11:57
Davis, Laurance Jr	CP Motion Hearing	Event	03/06/2008 - 11:00:00	02/19/2008 - 12:00:00
Parkview Apartments, A So	order of commission for out of state subpoena	Motion	04/29/2008 - 09:36:39	05/05/2008 - 09:36:39
Parkview Apartments, A So	Motion/Amend Scheduling Order & Cert of Service	Motion	04/29/2008 - 14:33:43	04/29/2008 - 14:33:43
Parkview Apartments, A So	Order/commission out of state subpoena	Filing	04/29/2008 - 08:41:18	04/09/2010 - 08:41:18
Parkview Apartments, A So	Order/commission out of state subpoena	Filing	04/29/2008 - 08:42:15	04/09/2010 - 08:42:15
Parkview Apartments, A So	Order/commission out of state subpoena	Filing	04/29/2008 - 08:43:09	04/09/2010 - 08:43:09
Parkview Apartments, A So	Order/commission of out of state subpoena	Filing	04/29/2008 - 08:44:14	04/09/2010 - 08:44:14
Parkview Apartments, A So	Order/commission out of state subpoena	Filing	04/29/2008 - 08:45:07	04/09/2010 - 08:45:07
Parkview Apartments, A So	Order/commission out of state subpoena	Filing	04/29/2008 - 08:45:57	04/09/2010 - 08:45:57
Parkview Apartments, A So	Order/commission for out of state subpoena	Filing	04/29/2008 - 08:47:05	04/09/2010 - 08:47:05
Parkview Apartments, A So	Order commission for out of state subpoena	Filing	04/29/2008 - 09:59:19	04/09/2010 - 09:59:19
Parkview Apartments, A So	Order/commission for out of state subpoena	Filing	04/29/2008 - 15:30:41	04/09/2010 - 15:30:41
Davis, Laurance Jr	Motion/Compel #3 & Cert of Service	Motion	06/16/2008 - 10:10:32	06/16/2008 - 10:10:32
Davis, Laurance Jr	Motion/Compel #4 & Cert of Service	Motion	06/16/2008 - 10:13:20	06/16/2008 - 10:13:20
Davis, Laurance Jr	Motion/Compel #5 & Cert of Service	Motion	06/16/2008 - 10:15:50	06/16/2008 - 10:15:50
Davis, Laurance Jr	Motion/Compel #6 & Cert of Service	Motion	06/16/2008 - 10:18:00	06/16/2008 - 10:18:00
Parkview Apartments, A So	Order/Motion for Summary Judgment is denied	Order	06/17/2008 - 15:34:34	04/09/2010 - 15:34:34
Parkview Apartments, A So	Memo in Opposition to Plf's Mot/Compel #3,4,5; Cert/Serv	Filing	07/03/2008 - 08:57:21	04/09/2010 - 08:57:21
Parkview Apartments, A So	Memo in Opposition to Plf's Mot/Compel #6; Cert/Serv	Filing	07/03/2008 - 09:00:58	04/09/2010 - 09:00:58
Davis, Laurance Jr	Cert Serv/Affidavit of Oliver Wood on Attys of Record 8-5-08	Filing	08/08/2008 - 09:24:40	04/09/2010 - 09:24:40
Davis, Laurance Jr	Affidavit of Oliver G. Wood Jr	Filing	08/08/2008 - 10:31:41	04/09/2010 - 10:31:41
Davis, Laurance Jr	Form 4 Order (trial date certain 5-18-09)	Order	08/26/2008 - 09:39:13	08/26/2008 - 09:39:13
Parkview Apartments, A So	Motion/Protective Order & Cert of Service	Motion	08/26/2008 - 15:04:50	06/16/2008 - 15:04:50
Davis, Laurance Jr	Motion/Issuance of Commission for Out of State Subpoena	Motion	09/19/2008 - 11:16:56	01/06/2009 - 11:16:56
Davis, Laurance Jr	Motion/Issuance of Commission for Out of State Subpoena	Motion	09/29/2008 - 10:44:42	01/06/2009 - 10:44:42

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance Jr	Order for Commission of Out-of-State Subpoena	Filing	10/10/2008 - 08:40:55	09/30/2008 - 08:40:55
Parkview Apartments, A So	Offer Of Judgment; Cert/Service	Filing	10/28/2008 - 13:32:00	04/09/2010 - 13:32:00
Parkview Apartments, A So	Motion/Compel Discovery Responses from all Plts; Cert of	Motion	11/10/2008 - 16:17:19	01/06/2009 - 16:17:19
Davis, Laurance Jr	Order Denying Plaintiffs' Motion to Compel #6 of 6-12-08	Filing	11/20/2008 - 14:47:50	08/18/2008 - 14:47:50
Parkview Apartments, A So	Memo In Support of Motion to Compel Discovery Responses	Filing	12/11/2008 - 13:25:37	04/09/2010 - 13:25:37
Parkview Apartments, A So	Order Denying Motion to Compel #2 & Cert of Service	Filing	12/23/2008 - 15:56:01	12/17/2008 - 15:56:01
Davis, Laurance Jr	Motion/Alter and/or Amend & Cert of Service	Motion	01/02/2009 - 14:39:44	04/09/2010 - 14:39:44
Parkview Apartments, A So	CP Motion Hearing	Event	01/06/2009 - 14:30:00	11/25/2008 - 15:30:00
Davis, Laurance Jr	CP Motion Hearing	Event	01/06/2009 - 14:30:00	11/25/2008 - 15:30:00
Parkview Apartments, A So	Order/Appointing Honorable Gary E Clary Special Master for	Filing	01/06/2009 - 10:12:34	12/30/2008 - 10:12:34
Davis, Laurance Jr	Motion/Alter and/or Amend Order Appointing Special Master;	Motion	01/15/2009 - 15:51:14	04/09/2010 - 15:51:14
Parkview Apartments, A So	Consent Order Regarding Scope of Authority for Special	Filing	02/10/2009 - 10:16:18	01/31/2009 - 10:16:18
AIMCO	Memo/Opp Plaintiffs' 2 Motions to Alter & Amend/Cert Serv	Filing	02/13/2009 - 11:26:05	04/09/2010 - 11:26:05
AIMCO	Memo/Support of Motion for Protective Order/Cert Serv	Filing	02/13/2009 - 11:29:18	04/09/2010 - 11:29:18
Davis, Laurance Jr	Order Granting in Part & Denying in Part Plt Motion to	Filing	03/09/2009 - 14:16:11	03/03/2009 - 14:16:11
Parkview Apartments, A So	Order Granting Def Motion to Compel dated 11/06/08	Filing	03/10/2009 - 14:22:17	03/03/2009 - 14:22:17
Parkview Apartments, A So	Order to Continue Case Until 1st Available Trial Date on or	Filing	03/16/2009 - 16:12:55	03/09/2009 - 16:12:55
Davis, Laurance Jr	Motion/Alter and/or Amend Order Granting Def Motion to	Motion	03/17/2009 - 15:53:13	06/19/2009 - 15:53:13
Davis, Laurance Jr	Motion/Alter and/or Amend Order Dated 3/03/09	Motion	03/17/2009 - 16:04:47	03/26/2009 - 16:04:47
Davis, Laurance Jr	Motion/Alter and/or Amend Order Dated 3-9-09 & Cert Mailing	Motion	03/25/2009 - 09:37:30	04/03/2009 - 09:37:30
Davis, Laurance Jr	Order Deying Plt Motion Alter or Amend Order Dated 3/03/09	Filing	03/26/2009 - 16:16:14	03/23/2009 - 16:16:14
Davis, Laurance Jr	Order Denying Plt Motion to Alter or Amend Dated 3/09/09	Filing	04/03/2009 - 16:48:01	03/31/2009 - 16:48:01
AIMCO	Memo in Opposition to Motion (see notes)/Cert Serv	Filing	04/07/2009 - 13:26:38	04/09/2010 - 13:26:38
Davis, Laurance Jr	Order Regarding Scope of Authority for Special Master &	Filing	04/15/2009 - 16:04:06	04/09/2009 - 16:04:06
Vick, Calvin T Jr.	Order for Protection June 8-15,2009 & Cert of Service	Filing	05/20/2009 - 16:10:17	05/12/2009 - 16:10:17
Davis, Laurance Jr	Order Adopting Findings& Conclusions of Special Master	Filing	06/04/2009 - 16:50:15	06/02/2009 - 16:50:15

Name	Description	Action Type	Begin Date	Completion Date
	Clary			
Davis, Laurance Jr	Motion/Alter or Amend Order Adopting Finds & Conclusions of	Motion	06/15/2009 - 14:33:47	08/03/2009 - 14:33:47
Parkview Apartments, A So	Motion/Alter and/or Amend Order & Cert of Service	Motion	06/18/2009 - 14:44:08	06/19/2009 - 14:44:08
Davis, Laurance Jr	Order Denying Applicants Motion to Alter Or Amend Order	Filing	06/19/2009 - 14:07:05	06/16/2009 - 14:07:05
Davis, Laurance Jr	Memo/Memo in Support of Motion to alter or amend	Filing	07/06/2009 - 15:48:00	04/09/2010 - 10:39:55
Davis, Laurance Jr	Service/Certificate Of Service/MEM SUP	Filing	07/06/2009 - 15:48:00	04/09/2010 - 10:41:24
Parkview Apartments, A So	Memo/Memo in Support of Motion to Amend	Filing	07/07/2009 - 11:26:00	04/09/2010 - 09:10:43
Parkview Apartments, A So	Motion to Seal	Motion	07/30/2009 - 09:40:42	07/30/2009 - 09:40:42
Parkview Apartments, A So	Motion/Sanctions & Cert of Service	Motion	07/31/2009 - 11:25:37	12/15/2009 - 11:25:37
Davis, Laurance Jr	Order Amending Courts Order Dated 6/02/09	Filing	08/03/2009 - 10:57:13	07/28/2009 - 10:57:13
Parkview Apartments, A So	2nd Motion for Sanctions & Cert of Service	Motion	08/14/2009 - 10:12:27	12/15/2009 - 10:12:27
AIMCO	Memo/Memo in Support of 2 Motions to Sanction	Filing	08/25/2009 - 16:14:00	04/09/2010 - 16:34:29
Parkview Apartments, A So	Memo/Memo In Support of motion for sanctions	Filing	08/31/2009 - 16:40:00	04/09/2010 - 08:18:53
AIMCO	Order Granting DEF's Motion to Seal	Filing	09/04/2009 - 14:54:00	04/09/2010 - 13:54:10
Davis, Laurance Jr	Notice of Appeal of Order of Judge Early Dated 7/28/09	Filing	09/14/2009 - 15:05:13	04/09/2010 - 15:05:13
Davis, Laurance Jr	Proof Ser(Counsel &COC for Bft,Chalreston,&Orangburg Cnty)of	Filing	09/14/2009 - 15:06:22	04/09/2010 - 15:06:22
Parkview Apartments, A So	CP Motion Hearing	Event	12/15/2009 - 11:00:00	11/17/2009 - 12:00:00
Parkview Apartments, A So	Motion/Continuance & Cert of Service	Motion	12/22/2009 - 10:49:54	01/14/2010 - 10:49:54
Davis, Laurance Jr	Remittitur From Court Of Appeals	Filing	12/23/2009 - 15:05:08	04/09/2010 - 15:05:08
Parkview Apartments, A So	Order/Order Granting Motion for Continuance past 1-19-2010	Filing	01/14/2010 - 16:15:00	01/04/2010 - 10:09:24
Davis, Laurance Jr	Motion/Relief from July 28,2009 Order Amending Courts Order	Motion	02/02/2010 - 10:58:47	04/09/2010 - 10:58:47
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52

Name	Description	Action Type	Begin Date	Completion Date
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Parkview Apartments, A So	Memorandum In Support of Motion for Sanctions re: General	Filing	02/16/2010 - 13:15:02	04/09/2010 - 13:15:02
Parkview Apartments, A So	Supp Memo In Support of Motion for Sanctions and in	Filing	02/19/2010 - 11:01:58	04/09/2010 - 11:01:58
Davis, Laurance Jr	Motion for Disclosure & Discovery	Motion	02/22/2010 - 12:44:25	
Davis, Laurance Jr	Motion/Protective Order	Motion	02/22/2010 - 15:02:06	
Parkview Apartments, A So	Defendants' Memorandum in Opposition to Plaintiffs' Motion	Filing	03/03/2010 - 08:55:21	
Parkview Apartments, A So	Defendants' Memorandum opposing Plaintiffs'	Filing	03/03/2010 - 09:42:38	
Davis, Laurance Jr	Plaintiff's Reply Memorandum in Support of Motion	Filing	03/05/2010 - 17:06:26	
Parkview Apartments, A So	Defendants' Surreply to Plaintiff's Reply to Defendants'	Filing	03/08/2010 - 10:04:53	
Davis, Laurance Jr	Motion for Recusal & for Vacation of Prior Orders	Motion	03/30/2010 - 14:20:29	
Davis, Laurance Jr	Affidavit of Laurance H. Davis, Jr.	Filing	04/07/2010 - 10:37:31	
Davis, Laurance Jr	Affidavit of Joel D. Bailey	Filing	04/07/2010 - 11:04:45	
Parkview Apartments, A So	Order Granting Defs' Motions for Sanctions, Finding Plas in	Filing	04/09/2010 - 10:05:26	
Pike, Mary	Affidavit of Mary Jane Pike	Filing	04/09/2010 - 11:26:10	
Rentz, Rhoda G.	Affidavit of Rhoda G. Rentz	Filing	04/09/2010 - 11:43:58	
Reynolds, Eva Marie	Affidavit of Eva Marie Reynolds	Filing	04/16/2010 - 12:10:44	
Parkview Apartments, A So	Affidavit of Eric Hilty	Filing	04/23/2010 - 15:42:25	

Name	Description	Action Type	Begin Date	Completion Date
Parkview Apartments, A So	Affidavit of Ellis M Johnston II	Filing	04/23/2010 - 15:42:55	
Parkview Apartments, A So	Motion to Strike & Memo in Opposition to Plt Motion for	Motion	04/23/2010 - 15:43:23	
Davis, Laurance Jr	Motion for Reconsideration, Alteration or Amendment	Motion	04/26/2010 - 12:15:34	
Parkview Apartments, A So	Affidavit of Ellis M Johnston II	Filing	04/26/2010 - 15:45:36	
Davis, Laurance Jr	Affidavit in Opposition to Affidavit of Defendants' Counsel	Filing	05/05/2010 - 12:24:50	
Davis, Laurance Jr	Order (Plafs Motion Seeking Reconsideration Denied)	Filing	09/20/2010 - 14:23:18	09/16/2010 - 14:23:18
Davis, Laurance Jr	Order (Pafs 2nd Recusal Motion is Denied)	Filing	10/11/2010 - 10:27:36	10/07/2010 - 10:27:36
Davis, Laurance Jr	Order Denying Plaintiff's Motion for Protective Order	Filing	10/25/2010 - 13:45:15	10/22/2010 - 13:45:15
Davis, Laurance Jr	Plafs Motion to Alter or Amend Order Denying Plafs Motion	Motion	11/09/2010 - 16:48:58	12/16/2010 - 16:48:58
Parkview Apartments, A So	Memorandum in Opposition to Plafs Motion to Alter or Amend	Filing	11/22/2010 - 15:40:01	
Davis, Laurance Jr	Notice of Appeal/Proof of Service	Filing	12/06/2010 - 16:56:24	
Davis, Laurance Jr	F4 Order-Pla Mot To Alter/Amend Denied	Order	12/16/2010 - 11:15:55	



Beaufort County Fourteenth Circuit Public Index


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**Laurance H Davis Jr , plaintiff, et al VS Palmetto Apartments A Sc Limit
, defendant, et al**

Case Number: 2005CP0701989	Court: Beaufort County Agency: Common Pleas	Filed Date: 10/13/2005
Case Type: Common Pleas	Case Sub Type: Special-Comp/Oth 699	File Type: Jury
Status: Appeal	Assigned Judge: Early, Doyet A. III	
Disposition: Ended by Non Jury	Disposition Date: 04/09/2010	Disposition Judge: Early, Doyet A. III
Original Source Doc:	Original Case #:	
Judgment Number:		

Parties	Judgments	Actions	Associated Cases	Tax Map Information
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Actions

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance H Jr	s-c	Filing	10/13/2005 - 00:00:00	10/13/2005 - 00:00:00
Davis, Laurance H Jr	s-c	Filing	10/13/2005 - 00:00:00	10/13/2005 - 00:00:00
Davis, Laurance H Jr	Filing Fee -150	Filing	10/13/2005 - 00:00:00	10/13/2005 - 00:00:00
Davis, Laurance H Jr	cer ser(SC Sec State statutory agt ISTC)	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Davis, Laurance H Jr	cer ser(ISTC)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Davis, Laurance H Jr	cer ser(Apartment Investment&Mgmt/Palmetto Apts)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Davis, Laurance H Jr	cer ser(Amreal Corp/Palmetto Apartments)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Davis, Laurance H Jr	cer ser(Apartment Investment& Mgmt/Insignia	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00

EXHIBIT

E

Name	Description	Action Type	Begin Date	Completion Date
	Financial)11/2/0			
Davis, Laurance H Jr	cer ser(Apartment Investment/Corporation Ser)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Davis, Laurance H Jr	cer ser(Amreal Corp/Corporation Ser)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Davis, Laurance H Jr	(cnt)pla's1st set of Interrog.&1st rqst to prodce on10/25/05	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Davis, Laurance H Jr	aff ser(Palmetto Apartmnts Lmted Prtnrshp by Linda Tuck)s-c,	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Davis, Laurance H Jr	(cnt)of Interrog.to def,1st rqst to produce on 10/25/05	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Davis, Laurance H Jr	aff ser(N Barton Tuck by Linda Tuck,spouse)s-c,pla's1st set	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Palmetto Apartments A Sc Limit	cnt:cer ser cncl rec 12/28/05(mot & ord on def resp time)	Filing	01/06/2006 - 00:00:00	01/06/2006 - 00:00:00
Palmetto Apartments A Sc Limit	ord(Gregary)def ans/resp on/before 1/16/06	Filing	01/06/2006 - 00:00:00	01/06/2006 - 00:00:00
Palmetto Apartments A Sc Limit	Palmetto unopposed mto for ext time file ans/resp pl comp	Filing	01/06/2006 - 00:00:00	01/06/2006 - 00:00:00
Palmetto Apartments A Sc Limit	cnt:cer ser cncl rec 1/17/06(ans,mot trans venue&dsms,affs)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	aff(Joan Christ)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	aff(George Buchanan)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	aff(Douglas G.Brown)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	aff(N.Barton Tuck,Jr)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	aff(William Jarrard)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	aff(Gary Hediger)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	aff(Arthur L.Howson,Jr)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	defs mot to dsmsl counts 1-7	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	mot to dsms for improper venue or alt trns to venue	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	cnt:ISTC,N.Barton,ALL DEFS)	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Palmetto Apartments A Sc Limit	ans(Palmetto Apts,Apartment Inv & mgmt co,Insignia,amreal,	Filing	01/20/2006 - 00:00:00	01/20/2006 - 00:00:00
Davis, Laurance H Jr	Dismiss Counts 1-7(Judge Early)	Filing	01/20/2006 - 00:00:00	04/09/2010 - 00:00:00
Davis, Laurance H Jr	Improper Venue(Judge Early)	Filing	01/20/2006 - 00:00:00	04/09/2010 - 00:00:00
Palmetto Apartments A Sc Limit	Notice of Filing Original Discovery Requests/Service		08/08/2006 - 10:05:11	04/09/2010 - 10:05:11
Palmetto Apartments A	Interrogatories		08/08/2006 -	04/09/2010 -

Name	Description	Action Type	Begin Date	Completion Date
Sc Limit			10:06:10	10:06:10
Palmetto Apartments A Sc Limit	Request for Production		08/08/2006 - 10:06:54	04/09/2010 - 10:06:54
Palmetto Apartments A Sc Limit	Request for Admissions		08/08/2006 - 10:07:40	04/09/2010 - 10:07:40
Palmetto Apartments A Sc Limit	Request for Admissions Exhibits		08/08/2006 - 10:11:34	04/09/2010 - 10:11:34
Palmetto Apartments A Sc Limit	Brief In Support of Motion to Dismiss of SJ/Exhibits/Service		08/08/2006 - 10:14:51	04/09/2010 - 10:14:51
Davis, Laurance H Jr	Plf memo/oppose to def motions & cert of service		08/29/2006 - 09:54:02	04/09/2010 - 09:54:02
Palmetto Apartments A Sc Limit	Def's Reply brief, Aff of N.Barton Tuck, Jr, & cert/service		09/25/2006 - 11:27:17	04/09/2010 - 11:27:17
Davis, Laurance H Jr	Aff of Laurance H Davis, Jr & cert/mailling		10/02/2006 - 10:40:17	04/09/2010 - 10:40:17
Davis, Laurance H Jr	Affidavit of Gregory B Adams		10/02/2006 - 13:48:42	04/09/2010 - 13:48:42
Davis, Laurance H Jr	Affidavit of James W Ivey		10/02/2006 - 13:50:40	04/09/2010 - 13:50:40
Ivey, Erin E	Affidavit of Erin E. Ivey		10/02/2006 - 13:52:31	04/09/2010 - 13:52:31
Davis, Laurance H Jr	Certificate of mailing of JasIvey, Erin Ivey & G.V.Adams aff		10/02/2006 - 13:54:42	04/09/2010 - 13:54:42
Palmetto Apartments A Sc Limit	Order denying defs' motion/dismiss or sum judgment		02/27/2007 - 13:06:59	03/02/2007 - 13:06:59
Davis, Laurance H Jr	Letter Regarding MTB Group Inc	Filing	11/01/2007 - 10:25:30	04/09/2010 - 10:25:30
Palmetto Apartment A Sc Limite	Motion & order of commissoon for out of state subpoena/ser	Motion	12/28/2007 - 14:46:28	02/08/2010 - 14:46:28
Davis, Laurance H Jr	CP Jury Trial Docket	Event	12/30/2007 - 10:00:00	09/11/2007 - 17:00:00
Davis, Laurance H Jr	Affidavit of Edward Hughes & Cert of Service	Filing	01/10/2008 - 15:40:13	04/09/2010 - 15:40:13
AIMCO	Motion/Protective Order Cert of Service	Motion	02/21/2008 - 11:12:30	02/21/2008 - 11:12:30
Palmetto Apartments A Sc Limit	Motion/Amend Scheduling Order & Cert of Service	Motion	04/29/2008 - 15:38:31	04/29/2008 - 15:38:31
Palmetto Apartments A Sc Limit	Order/commission out of state subpoena	Filing	04/29/2008 - 08:54:34	04/09/2010 - 08:54:34
Palmetto Apartments A Sc Limit	Order/commission of out of state subpoena	Filing	04/29/2008 - 08:55:25	04/09/2010 - 08:55:25
Palmetto Apartments A Sc Limit	Order/commission out of state subpoena	Filing	04/29/2008 - 08:56:58	04/09/2010 - 08:56:58
Palmetto Apartments A Sc Limit	Order/commission out of state subpoena	Filing	04/29/2008 - 08:58:15	04/09/2010 - 08:58:15
Palmetto Apartments A Sc Limit	Order/commission out of state subpoena	Filing	04/29/2008 - 08:59:19	04/09/2010 - 08:59:19
Palmetto Apartments A Sc Limit	Order/commission out of state subpoena	Filing	04/29/2008 - 09:00:05	04/09/2010 - 09:00:05
Palmetto Apartments A Sc Limit	Order/commission out of state subpoena	Filing	04/29/2008 - 09:01:07	04/09/2010 - 09:01:07
Palmetto Apartments A	Order of commisslon for out of	Filing	04/29/2008 -	04/09/2010 -

Name	Description	Action Type	Begin Date	Completion Date
Sc Limit	state subpoena		09:53:49	09:53:49
Palmetto Apartments A Sc Limit	Order/commission for out of state subpoena	Filing	04/29/2008 - 15:36:36	04/09/2010 - 15:36:36
Palmetto Apartments A Sc Limit	Order/Motion for Summary Judgment Is denied	Order	06/17/2008 - 15:39:25	04/09/2010 - 15:39:25
Palmetto Apartments A Sc Limit	Memo in Opposition to Plf's Mot/Compel #3,4,5; Cert/Serv	Filing	07/03/2008 - 09:06:55	04/09/2010 - 09:06:55
Palmetto Apartments A Sc Limit	Memo in Opposition to Plf's Mot/Compel #6; Cert/Serv	Filing	07/03/2008 - 09:07:53	04/09/2010 - 09:07:53
Davis, Laurance H Jr	Cert/Serv-Aff/Oliver Wood Jr of Cncl or Record on 7-29-08	Filing	08/01/2008 - 13:50:01	04/09/2010 - 13:50:01
Davis, Laurance H Jr	Form 4 Order (trial date certain 5-18-09)	Order	08/26/2008 - 09:35:18	08/26/2008 - 09:35:18
Palmetto Apartments A Sc Limit	Motion to Compel Discovery Responses	Filing	11/10/2008 - 12:07:18	04/09/2010 - 12:07:18
Palmetto Apartments A Sc Limit	Memo in Support of Motion to Compel Discovery Responses	Filing	12/11/2008 - 13:30:32	04/09/2010 - 13:30:32
Palmetto Apartments A Sc Limit	Order Denying Motion to Compel #2 & Cert of Service	Filing	12/23/2008 - 15:52:38	12/17/2008 - 15:52:38
Palmetto Apartments A Sc Limit	Order/Appointing Honorable Gary E Clary as Special Master	Filing	01/06/2009 - 10:27:54	12/30/2008 - 10:27:54
Davis, Laurance H Jr	Plas' Mot To Alter/Amend Order Appt Special Master(Original)	Filing	01/15/2009 - 14:27:10	04/09/2010 - 14:27:10
Palmetto Apartments A Sc Limit	Consent Order Regarding Scope of Authority for Special	Filing	02/10/2009 - 10:38:30	01/31/2009 - 10:38:30
Palmetto Apartments A Sc Limit	Memo in Support of Motion for Protective Order/Cert Serv	Filing	02/13/2009 - 11:49:05	04/09/2010 - 11:49:05
Palmetto Apartments A Sc Limit	Memo/Opp to Plaintiffs' 2 Motions to Alter & Amend/Cert Serv	Filing	02/13/2009 - 11:57:56	04/09/2010 - 11:57:56
Davis, Laurance H Jr	Order Granting in Part & Denying in Part Plt Motion to	Filing	03/09/2009 - 15:49:02	03/03/2009 - 15:49:02
Palmetto Apartments A Sc Limit	Order Granting Def Motion to Compel Dated 11/06/08	Filing	03/10/2009 - 15:51:44	03/03/2009 - 15:51:44
Palmetto Apartments A Sc Limit	Order to Continue Case until 1st Available Trial Date on or	Filing	03/16/2009 - 16:21:17	03/09/2009 - 16:21:17
Davis, Laurance H Jr	Motion/Alter and/or Amend Order Granting Def Motion to	Motion	03/17/2009 - 15:59:43	04/09/2010 - 15:59:43
Davis, Laurance H Jr	Order Regarding Scope of Authority for Special Master & Cert	Filing	04/15/2009 - 16:06:41	04/09/2009 - 16:06:41
Vick, Calvin T Jr.	Order for Protection for June 8-15,2009 & Cert of Service	Filing	05/20/2009 - 16:14:18	05/12/2009 - 16:14:18
Palmetto Apartments A Sc Limit	Motion to Alter or Amend Order / fee paid in case 03/726	Motion	06/18/2009 - 14:49:09	04/09/2010 - 14:49:09
Palmetto Apartment A Sc Limite	Memo/Memo In Support of Motion to Amend	Filing	07/07/2009 - 11:27:00	04/09/2010 - 09:13:21
Palmetto Apartments A Sc Limit	Motion to Seal	Motion	07/30/2009 - 09:49:19	07/30/2009 - 09:49:19
Palmetto Apartments A Sc Limit	Motion/Sanctions & Cert of Servcie	Motion	07/31/2009 - 11:31:37	12/15/2009 - 11:31:37
Davis, Laurance H Jr	Order Amending Courts Order Dated 6/02/09	Filing	08/03/2009 - 11:02:51	07/28/2009 - 11:02:51

Name	Description	Action Type	Begin Date	Completion Date
Palmetto Apartments A Sc Limit	2nd Motion for Sanctions & Cert of Service	Motion	08/14/2009 - 10:18:10	12/15/2009 - 10:18:10
Palmetto Apartments A Sc Limit	Memo/Memo in Support of 2 Motions to Sanction	Filing	08/25/2009 - 16:14:00	04/09/2010 - 16:31:05
Palmetto Apartments A Sc Limit	Memo/Memo in Support of Motions For Sanctions	Filing	08/31/2009 - 16:41:00	04/09/2010 - 08:23:27
AIMCO	Order Granting DEF's Motion to Seal	Filing	09/04/2009 - 14:54:00	04/09/2010 - 13:55:21
Davis, Laurance H Jr	Notice of Appeal of Order of Judge Early Dated 7/28/09	Filing	09/14/2009 - 15:05:40	04/09/2010 - 15:05:40
Davis, Laurance H Jr	Proof Ser(Counsel &COC for Bft,Chalreston,&Orangburg Cnty)of	Filing	09/14/2009 - 15:09:05	04/09/2010 - 15:09:05
Davis, Laurance H Jr	Letter	Filing	12/04/2009 - 15:52:04	04/09/2010 - 15:52:04
Palmetto Apartments A Sc Limit	CP Motion Hearing	Event	12/15/2009 - 11:00:00	11/17/2009 - 12:00:00
Palmetto Apartment A Sc Limite	Motion for Continuance & Cert of Service	Motion	12/22/2009 - 10:57:18	01/15/2010 - 10:57:18
Palmetto Apartments A Sc Limit	Order/Order Granting Motion for Continuance past 1-19-2010	Filing	01/15/2010 - 10:04:58	01/04/2010 - 10:04:58
Davis, Laurance H Jr	Motion/Relief from July 28,2009 Order Amendings Courts Oder	Motion	02/02/2010 - 11:05:00	04/09/2010 - 11:05:00
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Vick, Calvin T Jr.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Pendarvis, Thomas A.	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40

Name	Description	Action Type	Begin Date	Completion Date
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Palmetto Apartment A Sc Limite	Memo in Support of Motion for Sanctions re:General	Filing	02/16/2010 - 13:28:18	04/09/2010 - 13:28:18
Palmetto Apartments A Sc Limit	Supp memo in support of motion for sanctions and in	Filing	02/19/2010 - 11:20:19	04/09/2010 - 11:20:19
Davis, Laurance H Jr	Motion for Disclosure & Discovery	Motion	02/22/2010 - 15:05:39	
Davis, Laurance H Jr	Motion/Protective Order	Motion	02/22/2010 - 16:54:26	
Palmetto Apartment A Sc Limite	Defendants' Memorandum in Opposition to Plaintiffs'	Filing	03/03/2010 - 09:06:52	
Palmetto Apartment A Sc Limite	Defendants' Memorandum Opposing Plaintiffs'	Filing	03/03/2010 - 09:47:26	
Davis, Laurance H Jr	Plaintiff's Reply Memorandum In Support of Motion for	Filing	03/05/2010 - 08:34:48	
Palmetto Apartment A Sc Limite	Defendants' Surreply to Plaintiffs' Reply to Defendants'	Filing	03/08/2010 - 10:16:17	
Davis, Laurance H Jr	Motion for Recusal & for Vacation of Prior Orders	Motion	03/30/2010 - 14:29:09	
Davis, Laurance H Jr	Affidavit of Laurance H. Davis, Jr.	Filing	04/07/2010 - 10:42:48	
Davis, Laurance H Jr	Affidavit of Joel D. Bailey	Filing	04/07/2010 - 11:11:38	
Palmetto Apartments A Sc Limit	Order Granting Defs' Motions for Sanctions, Finding Plas in	Filing	04/09/2010 - 10:17:10	
Davis, Laurance H Jr	Affidavit of Mary Jane Pike	Filing	04/09/2010 - 11:30:53	
Davis, Laurance H Jr	Affidavit of Rhoda G. Rentz	Filing	04/09/2010 - 11:50:15	
Ivey, James W	Affidavit of James W. Ivey and Erin E. Ivey	Filing	04/16/2010 - 12:15:53	
Palmetto Apartments A Sc Limit	Affidavit of Eric Hilty	Filing	04/23/2010 - 15:59:05	
Palmetto Apartments A Sc Limit	Affidavit of Ellis M Johnston II	Filing	04/23/2010 - 15:59:39	
Palmetto Apartments A Sc Limit	Motion to Strike & Memo in Opposition to Plt Motion for	Motion	04/23/2010 - 16:00:12	
Davis, Laurance H Jr	Motion for Reconsideration, Alteration or Amendment	Motion	04/26/2010 - 12:33:03	
Palmetto Apartments A Sc Limit	Affidavit of Ellis M Johnston II	Filing	04/26/2010 - 16:01:50	
Davis, Laurance H Jr	Affidavit in Opposition to Affidavit of Defendants' Counsel	Filing	05/05/2010 - 12:07:18	
Davis, Laurance H Jr	Order (Plafs Motion Seeking Reconsideration Denied)	Filing	09/20/2010 - 14:30:08	09/16/2010 - 14:30:08
Davis, Laurance H Jr	Order (Plafs 2nd Recusal Motion Is Denied)	Filing	10/11/2010 - 10:29:32	10/07/2010 - 10:29:32
Davis, Laurance H Jr	Order Denying Plaintiffs Motion for Protective order	Filing	10/25/2010 - 13:48:59	10/22/2010 - 13:48:59
Davis, Laurance H Jr	Plafs Motion to Alter or Amend Order Denying Plafs Motion	Motion	11/09/2010 - 16:54:36	12/16/2010 - 16:54:36
Palmetto Apartments A Sc Limit	Memorandum in Opposition to Plafs Motion to Alter or Amend	Filing	11/22/2010 - 15:48:15	

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance H Jr	Notice of Appeal/Proof of Service	Filing	12/06/2010 - 16:51:39	
Davis, Laurance H Jr	F4 Order-Pla Mot To Alter/Amend Denied	Order	12/16/2010 - 11:22:46	



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Carolina Management Corporatio , plaintiff, et al VS Pinewood Park Apartments A Sc , defendant, et al

Case Number: 2005CP0701990 Court: Beaufort County
Agency: Common Pleas Filed Date: 10/13/2005
Case Type: Common Pleas Case Sub Type: Special-Comp/Oth
Type: 699 File Type: Jury
Status: Appeal Assigned Judge: Early, Doyet A. III
Disposition: Ended by Non Jury Disposition Date: 04/09/2010 Disposition Judge: Early, Doyet A. III
Original Source Doc: Original Case #:
Judgment Number:

[Parties](#) | [Judgments](#) | [Actions](#) | [Associated Cases](#) | [Tax Map Information](#)

Actions

Name	Description	Action Type	Begin Date	Completion Date
Carolina Management Corporatio	s-c	Filing	10/13/2005 - 00:00:00	10/13/2005 - 00:00:00
Carolina Management Corporatio	s-c	Filing	10/13/2005 - 00:00:00	10/13/2005 - 00:00:00
Carolina Management Corporatio	Filing Fee -150	Filing	10/13/2005 - 00:00:00	10/13/2005 - 00:00:00
Carolina Management Corporatio	cer ser(Apartment Investment&Mgmt/Plnewood apts)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Carolina Management Corporatio	cer ser(Amreal Corp/Corporation Ser)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Carolina Management Corporatio	cer ser(Apartment Investment&Mgmt/Corporation Serv)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Carolina Management Corporatio	cer ser(Apartment Investment Mgmt/Insignia Financial)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00

EXHIBIT**F**

Name	Description	Action Type	Begin Date	Completion Date
Carolina Management Corporatio	cer ser(Amreal Corp/Pinewood Park Apts)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Carolina Management Corporatio	cer ser(ISTC)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Carolina Management Corporatio	cer ser(SC Sec State statutory agt for ISTC)11/2/05	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Carolina Management Corporatio	(cnt)interrog.1st rqst to produce on 10/25/05	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Carolina Management Corporatio	aff ser(N Barton Tuck by Linda Tuck,spouse)s-c,pla's 1st set	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Carolina Management Corporatio	(cnt)1st request to produce on 10/25/05	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Carolina Management Corporatio	aff ser(Pinewood Park Apts by Linda Tuck)s-c,pla's1st inter	Filing	12/15/2005 - 00:00:00	12/15/2005 - 00:00:00
Carolina Management Corporatio	Dismiss Improper Venue(Johnson)	Filing	01/02/2006 - 00:00:00	04/09/2010 - 00:00:00
Pinewood Park Apartments A Sc	cnt:cer ser cncl rec 12/28/05(mot & ord to ext time def resp	Filing	01/06/2006 - 00:00:00	01/06/2006 - 00:00:00
Pinewood Park Apartments A Sc	ord(Gregary)ext of time for def to respond to pl comp	Filing	01/06/2006 - 00:00:00	01/06/2006 - 00:00:00
Pinewood Park Apartments A Sc	unopposed mot for ext of time(file ans/respond pl comp)	Filing	01/06/2006 - 00:00:00	01/06/2006 - 00:00:00
Pinewood Park Apartments A Sc	cnt:cer ser cncl rec 1/17/06(mot,ans,affs)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	aff(William Jarrard)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	aff(N.Barton Tuck,Jr)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	aff(Goerge Buchanan)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	aff(Douglas G.Brown)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	aff(Arthure L.Howson,Jr)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	answer of defs	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	dsms improper venue/trans venue(Johnson)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Pinewood Park Apartments A Sc	not & mot to dsms counts 1-7(Johnson)	Filing	01/23/2006 - 00:00:00	01/23/2006 - 00:00:00
Carolina Management Corporatio	Dismiss Counts 1-7(Johnson)	Filing	01/23/2006 - 00:00:00	04/09/2010 - 00:00:00
Tuck, N Barton Jr	Motion/for order removing N.Barton Tuck,Jr as def/service	Motion	07/31/2006 - 09:50:32	08/01/2007 - 09:50:32
Pinewood Park Apartments A Sc	Brief In Support of Motion to Dismiss or SJ		08/08/2006 - 09:42:15	04/09/2010 - 09:42:15
Carolina Management Corporatio	Plf's memopp to def mot & def's mot to dismiss & cert serv		08/29/2006 - 10:29:44	04/09/2010 - 10:29:44
Pinewood Park Apartments A Sc	Def's Reply brief & cert/service		09/25/2006 - 14:04:29	04/09/2010 - 14:04:29
Pinewood Park Apartments A Sc	Affidavit of N. Barton Tuck, Jr		09/25/2006 - 14:11:40	04/09/2010 - 14:11:40
Carolina Management	Affidavit of Laurance H. Davis,		10/02/2006 -	04/09/2010 -

Name	Description	Action Type	Begin Date	Completion Date
Corporatio	Jr & cert/mailling		10:53:36	10:53:36
Carolina Management Corporatio	Affidavit of Gregory B. Adams		10/02/2006 - 13:57:49	04/09/2010 - 13:57:49
Jackson, James B	Affidavit of James B Jackson, DDS		10/02/2006 - 14:01:41	04/09/2010 - 14:01:41
Carolina Management Corporatio	cert/serv of Jackson, Hinnant & Adams affs		10/02/2006 - 14:04:31	04/09/2010 - 14:04:31
Hinnant, Whaley R Jr	Affidavit of Whaley Hinnant, DDS		10/22/2006 - 14:00:17	04/09/2010 - 14:00:17
Carolina Management Corporatio	Order/Summary Judgment		03/27/2007 - 16:49:21	03/02/2007 - 16:49:21
Pinewood Park Apartments A Sc	Motion & order of commission for out of state subpoena/serv	Motion	12/28/2007 - 14:50:18	12/15/2009 - 14:50:18
Carolina Management Corporatio	CP Jury Trial Docket	Event	12/30/2007 - 10:00:00	09/11/2007 - 17:00:00
AIMCO	Motion/Protective Order & Cert of Service	Motion	02/21/2008 - 11:17:01	02/21/2008 - 11:17:01
Pinewood Park Apartments A Sc	Motion/Amend Scheduling Order & Cert of Service	Motion	04/29/2008 - 15:46:49	04/29/2008 - 15:46:49
Pinewood Park Apartments A Sc	Order/commission out of state subpoena	Filing	04/29/2008 - 09:02:24	04/09/2010 - 09:02:24
Pinewood Park Apartments A Sc	Order/commission out of state subpoena	Filing	04/29/2008 - 09:03:14	04/09/2010 - 09:03:14
Pinewood Park Apartments A Sc	Order/commission out of state subpoena	Filing	04/29/2008 - 09:03:55	04/09/2010 - 09:03:55
Pinewood Park Apartments A Sc	Order/out of state subpoena	Filing	04/29/2008 - 09:04:46	04/09/2010 - 09:04:46
Pinewood Park Apartments A Sc	Order/commission out of state subpoena	Filing	04/29/2008 - 09:05:28	04/09/2010 - 09:05:28
Pinewood Park Apartments A Sc	Order/commission out of state subpoena	Filing	04/29/2008 - 09:06:15	04/09/2010 - 09:06:15
Pinewood Park Apartments A Sc	Order/commission out of state subpoena	Filing	04/29/2008 - 09:08:02	04/09/2010 - 09:08:02
Carolina Management Corporatio	Order of commission for out of state subpoena	Filing	04/29/2008 - 09:55:15	04/09/2010 - 09:55:15
Pinewood Park Apartments A Sc	Order/commission for out of state subpoena	Filing	04/29/2008 - 15:38:21	04/09/2010 - 15:38:21
Carolina Management Corporatio	Cert/Serv-Aff/Oliver Wood Jr on Cncl of Record 7-29-08	Filing	08/01/2008 - 13:47:33	04/09/2010 - 13:47:33
Carolina Management Corporatio	Form 4 Order (trial date certain 5-18-09)	Order	08/26/2008 - 09:25:47	08/26/2008 - 09:25:47
Pinewood Park Apartments A Sc	Filing/Motion to Compel Discovery Responses	Filing	11/10/2008 - 12:11:00	04/09/2010 - 12:11:00
Pinewood Park Apartments A Sc	Memo in Support of Motion to Compel Discover Responses	Filing	12/11/2008 - 13:34:06	04/09/2010 - 13:34:06
Pinewood Park Apartments A Sc	Order Denying Motion to Compel #2 & Cert of Service	Filing	12/23/2008 - 15:49:45	12/17/2008 - 15:49:45
Pinewood Park Apartments A Sc	Order/Appointing Honorable Gary E Clary as Special Master	Filing	01/06/2009 - 10:31:04	12/30/2008 - 10:31:04
Carolina Management Corporatio	Plas' Motion To Alter/Amend Order Appt Special Master(Origin	Filing	01/16/2009 - 14:26:00	04/09/2010 - 14:26:00
Pinewood Park Apartments A Sc	Consent Order Regarding Scope of Authority for Special	Filing	02/10/2009 - 10:28:48	01/31/2009 - 10:28:48
Pinewood Park	Memo/Support of Motion for	Filing	02/13/2009 -	04/09/2010 -

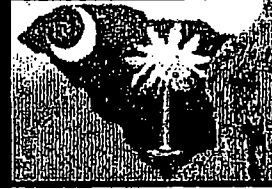
Name	Description	Action Type	Begin Date	Completion Date
Apartments A Sc	Protective Order/Cert Serv		11:32:46	11:32:46
Carolina Management Corporatio	Order Granting in Part & Denying in Part Plt Motion to	Filing	03/09/2009 - 15:42:43	03/03/2009 - 15:42:43
Pinewood Park Apartments A Sc	Order Granting Def Motion to Compel Dated 11/06/09	Filing	03/10/2009 - 15:46:55	03/03/2009 - 15:46:55
Pinewood Park Apartments A Sc	Order to Continue Case Until 1st Available Trial Date on or	Filing	03/16/2009 - 16:24:07	03/09/2009 - 16:24:07
Carolina Management Corporatio	Motion/Alter and/or Amend Order Granting Def Motion to	Motion	03/17/2009 - 15:42:18	04/09/2010 - 15:42:18
Pinewood Park Apartments A Sc	Memo In Opposition (see notes)/Cert Serv	Filing	04/07/2009 - 13:36:40	04/09/2010 - 13:36:40
Carolina Management Corporatio	Order Regarding Scope of Authority for Special Master & Cert	Filing	04/15/2009 - 16:09:07	04/09/2009 - 16:09:07
Vick, Calvin T Jr	Order for Protection for June 8-15,2009 & Cert of Service	Filing	05/20/2009 - 16:15:57	05/12/2009 - 16:15:57
Pinewood Park Apartments A Sc	Motion to Alter or Amend Order & Cert of Service	Motion	06/18/2009 - 14:53:50	04/09/2010 - 14:53:50
Pinewood Park Apartments A Sc	Memo/Memo in Support of Motion to Amend	Filing	07/07/2009 - 11:29:00	04/09/2010 - 09:15:10
Pinewood Park Apartments A Sc	Motion to Seal	Motion	07/30/2009 - 10:23:16	07/30/2009 - 10:23:16
Pinewood Park Apartments A Sc	Motion/Sanctions & Cert of Service	Motion	07/31/2009 - 12:56:41	12/15/2009 - 12:56:41
Carolina Management Corporatio	Order Amending Courts Order Dated 6/02/09	Filing	08/03/2009 - 11:13:20	07/28/2009 - 11:13:20
Pinewood Park Apartments A Sc	2nd Motion for Sanctions & Cert of Service	Motion	08/14/2009 - 10:22:11	12/15/2009 - 10:22:11
Pinewood Park Apartments A Sc	Memo/Memo In Support of 2 Motions to Sanction	Filing	08/25/2009 - 16:15:00	04/09/2010 - 16:37:02
Pinewood Park Apartments A Sc	Memo/Memo In Support of motion for Sanctions	Filing	08/31/2009 - 16:42:00	04/09/2010 - 08:21:32
AIMCO	Order Granting DEF's Motion to Seal	Filing	09/04/2009 - 14:54:00	04/09/2010 - 13:56:15
Carolina Management Corporatio	Notice of Appeal of Order of Judge Early Dated 7/28/09	Filing	09/14/2009 - 15:06:00	04/09/2010 - 15:06:00
Carolina Management Corporatio	Proof Ser(Counsel &COC for Bft,Chalreston,&Orangburg Cnty)of	Filing	09/14/2009 - 15:10:22	04/09/2010 - 15:10:22
Pinewood Park Apartments A Sc	CP Motion Hearing	Event	12/15/2009 - 11:00:00	11/17/2009 - 12:00:00
Pinewood Park Apartments A Sc	Motion for Continuance & Cert of Service	Motion	12/22/2009 - 11:00:47	01/14/2010 - 11:00:47
Pinewood Park Apartments A Sc	Order/Order Granting Motion for Continuance past 1-19-2010	Filing	01/14/2010 - 16:15:00	01/04/2010 - 10:07:56
Carolina Management Corporatio	Motion/Relief from July 28, 2009 Order Amending Courts Order	Motion	02/02/2010 - 11:10:44	04/09/2010 - 11:10:44
Pendarvis, Thomas A	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Pendarvis, Thomas A	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52

Name	Description	Action Type	Begin Date	Completion Date
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Vick, Calvin T Jr	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Vick, Calvin T Jr	Notice of Motions Roster Publication Sent	Amount	02/09/2010 - 13:48:52	04/09/2010 - 13:48:52
Pendarvis, Thomas A	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Pendarvis, Thomas A	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Vick, Calvin T Jr	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Vick, Calvin T Jr	Notice of Motions Roster Publication Sent	Amount	02/12/2010 - 16:46:40	04/09/2010 - 16:46:40
Pinewood Park Apartments A Sc	Memo in Support for Sanctions re: General Discovery	Filing	02/16/2010 - 11:43:47	04/09/2010 - 11:43:47
Pinewood Park Apartments A Sc	Supp memo in Support of their Motion for Sanctions and in	Filing	02/19/2010 - 11:47:01	04/09/2010 - 11:47:01
Carolina Management Corporatio	Motion for Disclosure & Discovery	Motion	02/22/2010 - 17:01:11	
Carolina Management Corporatio	Motion/Protective Order	Motion	02/22/2010 - 17:04:58	
Pendarvis, Thomas A	Notice of Motions Roster Publication Sent	Amount	02/24/2010 - 08:29:07	04/09/2010 - 08:29:07
Bailey, Joel D	Notice of Motions Roster Publication Sent	Amount	02/24/2010 - 08:29:07	04/09/2010 - 08:29:07
Johnston, Ellis M II	Notice of Motions Roster Publication Sent	Amount	02/24/2010 - 08:29:07	04/09/2010 - 08:29:07
Vick, Calvin T Jr	Notice of Motions Roster Publication Sent	Amount	02/24/2010 - 08:29:07	04/09/2010 - 08:29:07
Pinewood Park Apartments A Sc	Defendants' Memorandum in Opposition to Plaintiffs'	Filing	03/03/2010 - 09:19:10	
Pinewood Park Apartments A Sc	Defendants' Memorandum Opposing Plaintiffs' Motion	Filing	03/03/2010 - 09:55:41	
Carolina Management Corporatio	Plaintiffs' Reply Memorandum In Support of Motion for	Filing	03/05/2010 - 08:39:08	
Pinewood Park Apartments A Sc	Defendants' Surreply to Plaintiffs' Reply to Defendants'	Filing	03/08/2010 - 10:22:13	
Carolina Management Corporatio	Motion for Recusal & for Vacation of Prior Orders	Motion	03/30/2010 - 14:33:27	
Carolina Management Corporatio	Affidavit of Laurance H. Davis, Jr.	Filing	04/07/2010 - 10:56:56	
Carolina Management	Affidavit of Joel D. Bailey	Filing	04/07/2010 -	

Name	Description	Action Type	Begin Date	Completion Date
Corporatio			11:16:06	
Pinewood Park Apartments A Sc	Order Granting Defs'Motions for Sanctions,Finding Plas In	Filing	04/09/2010 - 10:22:30	
Carolina Management Corporatio	Affidavit of Mary Jane Pike	Filing	04/09/2010 - 11:37:25	
Rentz, Rhoda G	Affidavit of Rhoda G. Rentz	Filing	04/09/2010 - 11:55:25	
Hinnant, Whaley R Jr	Affidavit	Filing	04/15/2010 - 12:11:00	
Pinewood Park Apartments A Sc	Motion to Strike & Memo In Opposition to Plt Motion for	Motion	04/23/2010 - 16:08:09	
Pinewood Park Apartments A Sc	Affidavit of Eric Hilty	Filing	04/23/2010 - 16:09:33	
Pinewood Park Apartments A Sc	Affidavit of Ellis M Johnston II	Filing	04/23/2010 - 16:09:53	
Carolina Management Corporatio	Motion for Reconsideration, Alternation or Amendment	Motion	04/26/2010 - 12:46:02	
Pinewood Park Apartments A Sc	Affidavit of Ellis M Johnston II	Filing	04/26/2010 - 16:10:26	
Carolina Management Corporatio	Affidavit In Opposition to Affidavit of Defendants' Counsel	Filing	05/05/2010 - 12:12:24	
Carolina Management Corporatio	Order (Pafs Motion Seeking Reconsideration Denied)	Filing	09/20/2010 - 14:32:18	09/16/2010 - 14:32:18
Carolina Management Corporatio	Order (Plafs 2nd Recusal Motion is Denied)	Filing	10/11/2010 - 10:32:19	10/07/2010 - 10:32:19
Carolina Management Corporatio	Order Denying Plaintiff's Motion for Protective Order	Filing	10/25/2010 - 13:50:14	10/22/2010 - 13:50:14
Carolina Management Corporatio	Plafs Motion to Alter or Amend Order Denying Plafs Motion	Motion	11/09/2010 - 16:58:11	12/16/2010 - 16:58:11
Pinewood Park Apartments A Sc	Memorandum In Opposition to Plafs Motion to Alter or Amend	Filing	11/22/2010 - 15:52:39	
Carolina Management Corporatio	Notice of Appeal/Proof of Service	Filing	12/06/2010 - 16:54:32	
Carolina Management Corporatio	F4 Order-Pla Mot To Alter/Amend Denied	Order	12/16/2010 - 11:23:58	



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Laurance H jr Davis , plaintiff, et al VS Roosevelt gardens , defendant,
et al

Case Number: 2005CP3801131	Court Agency: Common Pleas	Filed Date: 10/17/2005
Case Type: Common Pleas	Case Sub Breach of Cont Type: 140	File Type: Jury
Status: Pending/Status Conf Set	Assigned Early, Doyet A. Judge: III	
Disposition:	Disposition Date	Disposition Judge:
Original Source Doc:	Original Case #:	
Judgment Number:		

[Parties](#) | [Judgments](#) | [Actions](#) | [Associated Cases](#) | [Tax Map Information](#)

Actions

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance H jr	Summons & Complaint	Filing	10/17/2005 - 00:00:00	10/17/2005 - 00:00:00
Davis, Laurance H jr	SUMM/COMP	Filing	10/17/2005 - 00:00:00	10/17/2005 - 00:00:00
Davis, Laurance H jr	CERT SERVS	Filing	11/07/2005 - 00:00:00	11/07/2005 - 00:00:00
Davis, Laurance H jr	AFF SERV/2	Filing	12/16/2005 - 00:00:00	12/16/2005 - 00:00:00
Davis, Laurance H jr	ORDER EXTENSION	Filing	12/29/2005 - 00:00:00	12/29/2005 - 00:00:00
Roosevelt gardens	MOTION DISM/2	Filing	01/18/2006 - 00:00:00	01/18/2006 - 00:00:00
Roosevelt gardens	MOTION DISM/2	Filing	01/18/2006 - 00:00:00	01/18/2006 - 00:00:00
Roosevelt gardens	DISCOVER REQ & INTERR	Filing	08/07/2006 - 00:00:00	08/07/2006 - 00:00:00

EXHIBIT

G

Name	Description	Action Type	Begin Date	Completion Date
Roosevelt gardens	BRIEF IN SUPPORT MTD	Filing	08/07/2006 - 00:00:00	08/07/2006 - 00:00:00
Davis, Laurance H jr	MEMOR OF LAW	Filing	08/28/2006 - 00:00:00	08/28/2006 - 00:00:00
Roosevelt gardens	REPLY BRIEF & AFFIDAVITS	Filing	09/21/2006 - 00:00:00	09/21/2006 - 00:00:00
Davis, Laurance H jr	CERT OF MAIL/AFF OF MILESHODGE	Filing	10/02/2006 - 00:00:00	10/02/2006 - 00:00:00
Davis, Laurance H jr	AFF OF GREGORY B. ADAMS	Filing	10/02/2006 - 00:00:00	10/02/2006 - 00:00:00
Davis, Laurance H jr	AFFIDAVIT	Filing	10/04/2006 - 00:00:00	10/04/2006 - 00:00:00
Davis, Laurance H jr	ORDER DENY MOTION DISM	Filing	02/21/2007 - 00:00:00	02/21/2007 - 00:00:00
Davis, Laurance H jr	RETURN OF SUBP	Filing	10/31/2007 - 00:00:00	10/31/2007 - 00:00:00
Davis, Laurance H jr	BRIEF IN OPPOSITION	Filing	11/20/2007 - 00:00:00	11/20/2007 - 00:00:00
Davis, Laurance H jr	CERT SERV	Filing	12/07/2007 - 00:00:00	12/07/2007 - 00:00:00
Davis, Laurance H jr	AFFIDAVIT MCLEAN	Filing	12/14/2007 - 00:00:00	12/14/2007 - 00:00:00
Davis, Laurance H jr	ORDER OF COMMISSION FOR OUT-OFSTATE SUBPOENA TO THE MTB GROU	Filing	01/02/2008 - 00:00:00	01/02/2008 - 00:00:00
Roosevelt gardens	MOT INFO FORM/COVERSHEET	Filing	01/02/2008 - 00:00:00	01/02/2008 - 00:00:00
Roosevelt gardens	DEF'S MOT FOR ISSUANCE OF ACOMM FOR THE OUT OF STATE SUB	Filing	01/02/2008 - 00:00:00	01/02/2008 - 00:00:00
Roosevelt gardens	CERT OF SERV	Filing	01/02/2008 - 00:00:00	01/02/2008 - 00:00:00
Davis, Laurance H jr	ORDER OF COMMISSION	Filing	02/06/2008 - 00:00:00	02/06/2008 - 00:00:00
Davis, Laurance H jr	LETTER HSB	Filing	02/15/2008 - 00:00:00	02/15/2008 - 00:00:00
Davis, Laurance H jr	MOTION FOR PROT ORDER	Filing	03/04/2008 - 00:00:00	03/04/2008 - 00:00:00
Roosevelt gardens	MOTION FOR PROTECTIVE ORDER	Filing	03/06/2008 - 00:00:00	03/06/2008 - 00:00:00
Davis, Laurance H jr	LETTER	Filing	04/24/2008 - 00:00:00	04/24/2008 - 00:00:00
Davis, Laurance H jr	LETTER	Filing	04/28/2008 - 00:00:00	04/28/2008 - 00:00:00
Davis, Laurance H jr	ORDER OF COMM FOR OUT STATESUBP	Filing	05/02/2008 - 00:00:00	05/02/2008 - 00:00:00
Roosevelt gardens	MOTION AMEND SCHED ORDER	Filing	05/02/2008 - 00:00:00	05/02/2008 - 00:00:00
Roosevelt gardens	ORDER DENY MTION FOR SJ	Filing	06/17/2008 - 00:00:00	06/17/2008 - 00:00:00
Roosevelt gardens	DEF BRIEF IN OPP/MOT TO COMPEL	Filing	07/10/2008 - 00:00:00	07/10/2008 - 00:00:00
Roosevelt gardens	CERT OF SERV	Filing	08/04/2008 - 00:00:00	08/04/2008 - 00:00:00
Davis, Laurance H jr	Order/Order	Order	11/24/2008 -	

Name	Description	Action Type	Begin Date	Completion Date
			13:12:00	
Davis, Laurance H jr	Motion/Compel	Motion	11/25/2008 - 16:33:00	04/06/2009 - 10:44:02
Davis, Laurance H jr	Memo/Memo in Support	Filing	12/15/2008 - 13:37:00	
Davis, Laurance H jr	Order/Denying Motion To Compel	Order	01/05/2009 - 15:24:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	01/05/2009 - 15:25:00	
Davis, Laurance H jr	Order/Appointing The Hon. Gary E. Clary	Order	01/08/2009 - 08:38:21	
Davis, Laurance H jr	Letter/Letter	Filing	02/11/2009 - 11:56:00	
Davis, Laurance H jr	Order/Consent Order regarding scope/ authority for special m	Order	02/17/2009 - 11:19:45	
Davis, Laurance H jr	Memo/Memo in Opposition	Filing	02/19/2009 - 15:03:00	
Davis, Laurance H jr	Memo/Memo in Support	Filing	02/19/2009 - 15:03:00	
Davis, Laurance H jr	Letter/Letter	Filing	03/09/2009 - 12:40:00	
Davis, Laurance H jr	Letter/Letter	Filing	03/12/2009 - 12:49:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	03/16/2009 - 11:48:00	06/11/2009 - 10:37:36
Davis, Laurance H jr	Plaintiff's Motion/Alter or Amend Order Granting Motion/Compel	Motion	03/16/2009 - 11:48:00	06/11/2009 - 10:38:35
Davis, Laurance H jr	Service/Certificate Of Hand Delivery	Filing	03/16/2009 - 11:48:00	
Davis, Laurance H jr	Order Granting and Denying in part Plaintiff's Motion/Compel	Order	03/17/2009 - 13:57:00	
Davis, Laurance H jr	Order/Order	Order	03/20/2009 - 13:10:00	
Davis, Laurance H jr	Letter/Letter	Filing	04/07/2009 - 08:33:00	
Davis, Laurance H jr	Memo/Memo in Opposition order granting motion compel	Filing	04/14/2009 - 08:29:00	
Davis, Laurance H jr	Order Regarding scope of authority for special master	Order	04/20/2009 - 16:32:00	
Davis, Laurance H jr	Letter/Letter of Protection Order	Filing	05/19/2009 - 14:17:00	
Davis, Laurance H jr	Order/Protective Order	Order	05/26/2009 - 13:35:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	06/15/2009 - 11:19:00	
Davis, Laurance H jr	Motion to Alter or Amend Order (Judge Early Barnerg Co)	Motion	06/15/2009 - 11:20:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	06/15/2009 - 11:20:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	06/24/2009 - 11:51:00	
Davis, Laurance H jr	Motion/Motion to amend or Alter Order	Motion	06/24/2009 - 11:51:00	
Davis, Laurance H jr	Order/Amend or Alter	Order	07/07/2009 -	

Name	Description	Action Type	Begin Date	Completion Date
			09:42:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	07/07/2009 - 09:42:00	
Davis, Laurance H jr	Memo/Memo in Support of Defendants Motion	Filing	07/10/2009 - 15:52:00	
Davis, Laurance H jr	Letter/Letter	Filing	07/28/2009 - 12:23:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	08/03/2009 - 16:53:00	
Davis, Laurance H jr	Motion/Motion to Seal	Motion	08/03/2009 - 16:53:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	08/06/2009 - 14:45:00	
Davis, Laurance H jr	Defendant's Motion For Sanctions	Motion	08/06/2009 - 14:45:00	
Davis, Laurance H jr	Order/Amending Court's Order dated June 2,2009	Order	08/06/2009 - 14:47:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	08/20/2009 - 23:46:00	
Davis, Laurance H jr	Defendants 2nd Motion For Sanctions	Motion	08/20/2009 - 23:46:00	
Davis, Laurance H jr	Memo/Memo in Support	Filing	08/24/2009 - 16:30:00	
Davis, Laurance H jr	Letter/Letter supp. Memo in support of Defendants	Filing	08/28/2009 - 13:07:00	
Davis, Laurance H jr	Memo/Memo in Support of Defendant's Two Motions	Filing	08/31/2009 - 15:22:00	
Davis, Laurance H jr	Letter Granting defendant's Motion to Seal	Filing	09/02/2009 - 11:55:00	
Davis, Laurance H jr	Supp. Memo in Support of Motion for Sanctions	Filing	09/09/2009 - 15:15:00	
Davis, Laurance H jr	Order/Granting Motion to Seal	Order	09/14/2009 - 13:10:00	
Davis, Laurance H jr	Notice/Notice of Appeal	Filing	09/14/2009 - 14:18:00	
Davis, Laurance H jr	Order/Order Appeal Granted	Order	12/03/2009 - 13:39:00	
Davis, Laurance H jr	Letter/Letter	Filing	12/18/2009 - 15:10:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	01/04/2010 - 14:35:00	
Davis, Laurance H jr	Motion/Motion For Continuance	Motion	01/04/2010 - 14:35:00	
Davis, Laurance H jr	Consent Order Granting Defendant's motion for Continuance	Order	01/15/2010 - 12:27:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	02/01/2010 - 11:38:00	
Davis, Laurance H jr	Motion/Motion For Relief from Order Amending Court's order	Motion	02/01/2010 - 11:38:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	02/01/2010 - 11:38:00	
Davis, Laurance H jr	Order/Protective Order For Thomas A Pendarvis	Order	02/08/2010 - 15:55:00	
Davis, Laurance H jr	Defendant's 2nd Supp Memo	Filing	02/12/2010 -	

Name	Description	Action Type	Begin Date	Completion Date
			11:35:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	02/22/2010 - 14:34:00	
Davis, Laurance H jr	Motion/Motion For Protective Order	Motion	02/22/2010 - 14:34:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	02/22/2010 - 14:35:00	
Davis, Laurance H jr	Motion/Motion For Disclosure & Discovery	Motion	02/22/2010 - 14:35:00	
Davis, Laurance H jr	Memo/Memo In Support 2nd Supp	Filing	02/22/2010 - 16:36:00	
Davis, Laurance H jr	Defendant's Supp Memo in Support of Motion for Sanctions	Filing	03/01/2010 - 13:54:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	03/01/2010 - 13:54:00	
Davis, Laurance H jr	Letter/Letter	Filing	03/02/2010 - 10:46:00	
Davis, Laurance H jr	Plaintiff's Memo in Support of Motion for Disclosure, Discove	Filing	03/05/2010 - 12:50:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	03/05/2010 - 12:50:00	
Davis, Laurance H jr	Letter/Letter	Filing	03/08/2010 - 15:05:00	
Davis, Laurance H jr	Defendant's Memo In Opposition Plt Motion for Protective Ord	Filing	03/10/2010 - 23:26:00	
Davis, Laurance H jr	Defendant's Memo in Opppsition to Motion for Disclosure	Filing	03/11/2010 - 10:57:00	
Davis, Laurance H jr	Defendant's Reply to Plaintiff's Reply to Defendant's	Filing	03/19/2010 - 15:13:00	
Davis, Laurance H jr	Notice of Motion&Motion for recusal/vacation of prior Orders	Filing	03/30/2010 - 14:40:00	
Davis, Laurance H jr	Affidavit/Affidavit of Joel D. Bailey	Filing	03/30/2010 - 14:41:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	04/05/2010 - 11:51:28	
Davis, Laurance H jr	Order/Order Granting Defentant's Two Motions for Sanctions	Order	04/08/2010 - 14:57:00	
Davis, Laurance H jr	Affidavit/Affidavit of Joel D. Bailey	Filing	04/12/2010 - 09:35:00	
Davis, Laurance H jr	Affidavit/Affidavit of Laurance H. Davis	Filing	04/12/2010 - 14:10:43	
Davis, Laurance H jr	Affidavit/Affidavit of Rhoda G Rentz	Filing	04/13/2010 - 11:39:00	
Davis, Laurance H jr	Affidavit/Affidavit of Mary Jane Pike	Filing	04/13/2010 - 11:39:00	
Davis, Laurance H jr	Affidavit/Affidavit of Miles Hodge	Filing	04/14/2010 - 11:09:00	
Davis, Laurance H jr	Letter/Letter	Filing	04/21/2010 - 12:03:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	04/26/2010 - 09:44:00	

Name	Description	Action Type	Begin Date	Completion Date
Davis, Laurance H jr	Plaintiff's Motion For Reconsideration,alter or Amend	Motion	04/26/2010 - 09:44:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	04/26/2010 - 14:42:00	
Davis, Laurance H jr	Affidavit/Affidavit of Thomas A. Pendarvis	Filing	04/27/2010 - 14:42:00	
Davis, Laurance H jr	Service/Certificate Of Service	Filing	04/27/2010 - 14:42:00	
Davis, Laurance H jr	Affidavit/Affidavit of Ellis M. Johnston II	Filing	04/29/2010 - 14:24:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	04/29/2010 - 14:25:00	
Davis, Laurance H jr	Motion/Motion to Strike	Motion	04/29/2010 - 14:25:00	
Davis, Laurance H jr	Memo/Memo In Opposition to Motion for Recusal/Vacation of	Filing	04/29/2010 - 14:25:00	
Davis, Laurance H jr	Affidavit/Affidavit of Ellis M. Johnston	Filing	04/29/2010 - 14:30:00	
Davis, Laurance H jr	Affidavit/Affidavit of Eric Hilty	Filing	04/30/2010 - 10:57:41	
Davis, Laurance H jr	Letter/Letter	Filing	05/05/2010 - 13:01:00	
Davis, Laurance H jr	Affidavit/Affidavit of Joel D. Bailey	Filing	05/07/2010 - 12:32:00	
Davis, Laurance H jr	Order/Protective Order	Order	05/13/2010 - 11:26:00	
Davis, Laurance H jr	Exhibits to Affidavit of Thomas A. Pendarvis	Filing	06/08/2010 - 10:22:00	
Davis, Laurance H jr	Affidavit/Affidavit of Ellis M. Johnston II	Filing	06/21/2010 - 15:08:00	
Davis, Laurance H jr	Defendant's Memo in Opposition to Motion for Reconsideration	Filing	06/21/2010 - 15:08:00	
Davis, Laurance H jr	Affidavit/Affidavit of Calvin T. Vick Jr	Filing	06/21/2010 - 16:15:00	
Davis, Laurance H jr	Order Plaintiff's Motion for Reconsideration Denied	Order	09/20/2010 - 15:04:00	
Davis, Laurance H jr	Order/Order	Order	10/08/2010 - 15:13:00	
Davis, Laurance H jr	Order/Order Denying Plaintiff's Motion for Protective Order	Order	10/25/2010 - 14:17:00	
Davis, Laurance H jr	Motion/Alter or Amend Order Denying Plaintiff's Motion for	Motion	11/10/2010 - 10:40:00	
Davis, Laurance H jr	Motion/Motion Filing Fee	Amount	11/10/2010 - 10:40:00	
Davis, Laurance H jr	Letter/Letter	Filing	11/19/2010 - 11:47:00	
Davis, Laurance H jr	Memo/Memo In Opposition to Plaintiff's motion to Alter/Amend	Filing	12/02/2010 - 14:54:00	
Davis, Laurance H jr	Notice/Notice of Appeal	Filing	12/06/2010 - 14:37:00	

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2003-CP-07-726

Laurance H. Davis, Jr.; et al.;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and
f/k/a USS Corporation a/k/a and f/k/a
U.S. Shelter Corporation; ISTC
Corporation; N. Barton Tuck, Jr.; and
John Doe, a generic designation for a
party or parties whose true identity is
unknown,

Defendants.

CONSOLIDATED CASES:

2005-CP-07-1990 (Beaufort) (**Pinewood**)
2005-CP-07-1989 (Beaufort) (**Palmetto**)
2005-CP-10-4229 (Charleston) (**Orleans**)
2005-CP-38-1131 (Orangeburg) (**Roosevelt**)

CERTIFICATE OF SERVICE

I, Thomas A. Pendarvis, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

DOCUMENTS SERVED

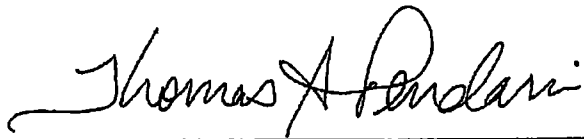
1. PLAINTIFFS' MOTION TO ALTER OR AMEND

COUNSEL SERVED

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, P.A.
P.O. Box 2048
Greenville SC 29602

Marvin D. Infinger, J.D.
Anne Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
134 Meeting Street, 3rd Floor
Charleston SC 29401




Thomas A. Pendarvis

Beaufort, South Carolina
December 30, 2008

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2003-CP-07-726

Laurance H. Davis, Jr.; et al.;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and
f/k/a USS Corporation a/k/a and f/k/a
U.S. Shelter Corporation; ISTC
Corporation; N. Barton Tuck, Jr.; and
John Doe, a generic designation for a
party or parties whose true identity is
unknown,

Defendants.

CONSOLIDATED CASES:

2005-CP-07-1990 (Beaufort) (**Pinewood**)
2005-CP-07-1989 (Beaufort) (**Palmetto**)
2005-CP-10-4229 (Charleston) (**Orleans**)
2005-CP-38-1131 (Orangeburg) (**Roosevelt**)

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

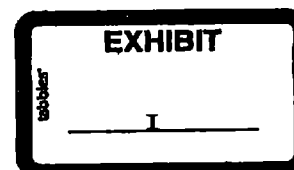
DOCUMENTS SERVED

1. PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER APPOINTING SPECIAL MASTER

COUNSEL SERVED

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, P.A.
P.O. Box 2048
Greenville SC 29602

Marvin D. Infinger, J.D.
Anne Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
134 Meeting Street, 3rd Floor
Charleston SC 29401



Jennifer A. Clark
Jennifer A. Clark

Beaufort, South Carolina
January 13, 2009

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Roosevelt Gardens, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Orangeburg County

CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)

-vs-)

Orleans Gardens, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Charleston County

CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Palmetto Apartments, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Beaufort County

C/A #2005-CP-07-1989

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Parkview Apartments, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Beaufort County

C/A # 03-CP-07-726

CERTIFICATE OF MAILING

I, Sandra H. Bailey, of THE BAILEY LAW FIRM, P.A., attorneys for the Plaintiffs herein, do hereby certify that on the 13th day of March, 2009, I mailed a copy of the Plaintiffs' Motion to Alter or Amend Order Da March 3, 2009, the same being addressed to:

Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

Calvin T. Vick, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

THE BAILEY LAW FIRM, P.A.
P.O. Box 1437
Beaufort, South Carolina 29901-1437
843-525-6090

By: Sandra H. Bailey

Sandra H. Bailey

Beaufort, South Carolina
March 13, 2009

EXHIBIT

J

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., et al., Plaintiffs,	)	
v.	)	Beaufort County
Parkview Apartments, a South Carolina	)	C.A. No. 2003-CP-07-726
Limited Partnership, et al., Defendants.	)	
Laurance H. Davis, Jr., et al., Plaintiffs,	)	
v.	)	Orangeburg County
Roosevelt Gardens, a South Carolina	)	C.A. No. 2005-CP-38-1131
Limited Partnership, et al., Defendants.	)	
Rhonda G. Rentz, et al., Plaintiffs,	)	
v.	)	Charleston County
Orleans Gardens, a South Carolina	)	C.A. No. 2005-CP-10-4229
Limited Partnership, et al., Defendants.	)	
Laurance H. Davis, Jr., et al., Plaintiffs,	)	
v.	)	Beaufort County
Palmetto Apartments, a South Carolina	)	C.A. No. 2005-CP-07-1989
Limited Partnership, et al., Defendants.	)	
Carolina Management Corporation of	)	
Beaufort, et al., Plaintiffs,	)	
v.	)	Beaufort County
Pinewood Park Apartments, a South	)	C.A. No. 2005-CP-07-1990
Carolina Limited Partnership, et al.,	)	
Defendants.	)	

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Documents Served

MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER GRANTING DEFENDANTS' MOTION TO COMPEL, DATED NOVEMBER 6, 2008



Counsel Served

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
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HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston SC 29401

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina

March 13, 2009

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Roosevelt Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Orangeburg County
CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)
-vs-)
Orleans Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Charleston County
CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Palmetto Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A #2005-CP-07-1989

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Parkview Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A # 03-CP-07-726

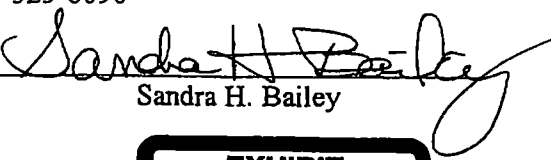
CERTIFICATE OF MAILING

I, Sandra H. Bailey, of THE BAILEY LAW FIRM, P.A., attorneys for the Plaintiffs herein, do hereby certify that on the 23rd day of March, 2009, I mailed a copy of the Plaintiffs' Motion to Alter or Amend Order Dated March 23, 2009, first class mail, postage pre-paid, the same being addressed to:

Clis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

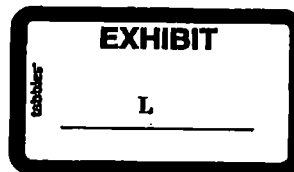
Calvin T. Vick, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

THE BAILEY LAW FIRM, P.A.
P.O. Box 1437
Beaufort, South Carolina 29901-1437
843-525-6090

By: 

Sandra H. Bailey

Beaufort, South Carolina
March 23, 2009



STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., et al., Plaintiffs,
v.

Parkview Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2003-CP-07-726
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.

Roosevelt Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Orangeburg County
) C.A. No. 2005-CP-38-1131
)

Rhonda G. Rentz, et al., Plaintiffs,
v.

Orleans Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Charleston County
) C.A. No. 2005-CP-10-4229
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.

Palmetto Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2005-CP-07-1989
)

Carolina Management Corporation of
Beaufort, et al., Plaintiffs,

v.
Pinewood Park Apartments, a South
Carolina Limited Partnership, et al.,
Defendants.

)
)
) Beaufort County
) C.A. No. 2005-CP-07-1990
)
)

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Documents Served

MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER
ADOPTING FINDINGS AND CONCLUSIONS OF SPECIAL MASTER CLARY, DATED JUNE 2, 2009



Counsel Served

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston SC 29401

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina

June 11, 2009

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort, Charleston, and Orangeburg Counties

Doyet A. Early, III, Circuit Court Judge

Beaufort County 03-CP-07-726
Beaufort County 05-CP-07-1989
Beaufort County 05-CP-07-1990
Charleston County 05-CP-10-4229
Orangeburg County 05-38-1131

RECEIVED
SEP 10 2009
SC Court of Appeals

Laurance H. Davis, Jr., et al. Appellants,

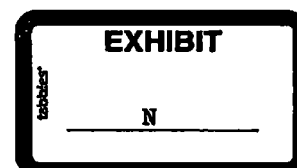
v.

Parkview Apartments, et al., ... Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, she served counsel
for the Respondents, with a copy of the Notice of Appeal by mailing copies of the same by
United States Mail with first class postage prepaid to the following address:

C. Theodore Vick, Jr., Esquire
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
Post Office Box 2048
Greenville, South Carolina 29602-2048



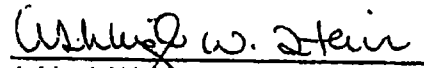
The undersigned hereby certifies she also served the Beaufort, Charleston, and Orangburg
County Clerk of Court with a copy of the Notice of Appeal by mailing a copy of the same by
United States Mail with first class postage prepaid to the following addresses:

The Honorable Jerri Roseneau
Beaufort County Clerk of Court
Post Office Drawer 1128
Beaufort, South Carolina 29901

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad Street, #106
Charleston, South Carolina 29401

The Honorable Lisa W. Mizell
Orangeburg County Clerk of Court
Post Office Drawer 9000
Orangeburg, South Carolina 29116

September 10, 2009
Columbia, South Carolina


Ashleigh W. Fair

FORM 4

STATE OF SOUTH CAROLINA

JUDGMENT IN A CIVIL CASE

COUNTY OF BEAUFORT

CASE NO: 2003CP0700726

IN THE COURT OF COMMON PLEAS

Laurance Davis Jr vs. AIMCO

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), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other:
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j) SCRPC; ☐ Bankruptcy: ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other:
- ☐ **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:

Order Granting Defendants' Two Motions For Sanctions, Finding Plaintiffs In Contempt Of Court, & Dismissing The Above Captioned Actions As Sanctions For Plaintiffs' Contempt

Dated at Beaufort, South Carolina, this 6th day of April, 2010.

Court Reporter:

s/ D. A. Early, III

PRESIDING JUDGE - Doyet A Early, III

This judgment was entered on the 9th day of April, 2010, and a copy mailed first class this 12th day of April, 2010, to attorneys of record or to parties (when appearing pro se) as follows:

Joel D Bailey
Thomas A. Pendarvis

Ellis M Johnston II
Calvin T Vick Jr.

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Melissa Kilby

SCRPC APP-24/FORM 4

Notarized by: Chandler Doyd, P.A.

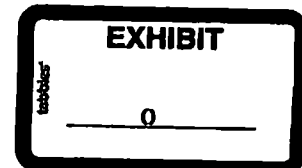
Notarized on: 4/16/10

Notarized at: _____

Notarized by: _____

Notarized for: _____

Jegri Ann Roseneau - Clerk of Court



FORM 4

STATE OF SOUTH CAROLINA

JUDGMENT IN A CIVIL CASE

COUNTY OF BEAUFORT

CASE NO: 2005CP0701989

IN THE COURT OF COMMON PLEAS

Laurance H Davis Jr vs. Palmetto Apartments A Sc Limit

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: _____
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**

☐ Affirmed;	☐ Reversed;	☐ Remeanded;	☐ 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:

Order Granting Defendants' Two Motions For Sanctions, Finding Plaintiffs In Contempt Of Court, & Dismissing The Above Captioned Actions As Sanctions For Plaintiffs' Contempt

Dated at Beaufort, South Carolina, this 6th day of April, 2010.

Court Reporter:

s/ D. A. Early, III

PRESIDING JUDGE - Doyet A. Early, III

This judgment was entered on the 9th day of April, 2010, and a copy mailed first class this 12th day of April, 2010, to attorneys of record or to parties (when appearing pro se) as follows:

Joel D Bailey
Thomas A. Pendarvis

Ellis M Johnston II
Calvin T Vick Jr.

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Melissa Kilby

SCRCP APP-24/FORM 4

Haywood - Doyet A. Early, III, PA
Date Filed 4/16/10
Clerk of Court
Docketed
ID#

Jerri Ann Roseaneau - Clerk of Court

CPFORM4M

FORM 4

STATE OF SOUTH CAROLINA

JUDGMENT IN A CIVIL CASE

COUNTY OF BEAUFORT

CASE NO: 2005CP0701990

IN THE COURT OF COMMON PLEAS

Carolina Management Corporatio vs. Pinewood Park Apartments A Sc**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), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit); ☐ Rule 43(k), SCRPC (Settled); ☐ Other:
- ☐ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j) SCRPC; ☐ Bankruptcy:
- ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
- ☐ Other: _____
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**

☐ Affirmed;	☐ Reversed;	☐ Remeanded;	☐ 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:

Order Granting Defendants' Two Motions For Sanctions, Finding Plaintiffs In Contempt of Court, & Dismissing The Above Captioned Actions As Sanctions For Plaintiffs' Contempt

Dated at Beaufort, South Carolina, this 6th day of April, 2010.

Court Reporter:

s/ D. A. Early, III

PRESIDING JUDGE - Doyet A. Early, III

This judgment was entered on the 9th day of April, 2010, and a copy mailed first class this 12th day of April, 2010, to attorneys of record or to parties (when appearing pro se) as follows:

 Joel D Bailey
 Thomas A Pendarvis

 Calvin T Jr Vick
 Ellis M Johnston II

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

SCRPC APP-24/FORM 4

Melissa Kilby

Jerri Ann Roseneau - Clerk of Court

CPFORM4M

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Parkview Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A # 03-CP-07-726

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Roosevelt Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Orangeburg County
CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)
-vs-)
Orleans Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Charleston County
CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Palmetto Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A #2005-CP-07-1989

Carolina Management Corporation of)
Beaufort, *et al*, Plaintiffs,)
-vs-)
Pinewood Park Apartments, a South)
Carolina Limited Partnership, *et al*,)
Defendants.)

Beaufort County
C/A # 2005-CP-07-1990

CERTIFICATE OF MAILING

I hereby certify that I have served the Plaintiffs' Motion for Reconsideration, Alteration or Amendment, by depositing a copy in the United States Mail, postage prepaid, on April 22, 2010, addressed to the following attorneys of record:

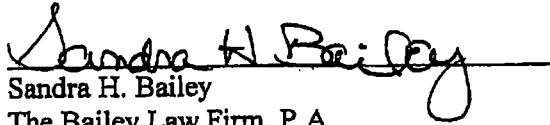
Ellis M. Johnston, II
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger
134 Meeting Street, 3rd Floor
Charleston, SC 29401



Calvin T. Vick
PO Box 2048
Greenville, SC 29602

Anne Ross Rosen
134 Meeting Street, 3rd Floor
Charleston, SC 29401


Sandra H. Bailey
The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort, South Carolina 29901-1437

April 21, 2010

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-10-4229

Rhoda G. Rentz, Mary Jane Pike, Eva Marie Reynolds, and Joanne O. Mercy, individually and in their capacities as the Limited Partners of Orleans Gardens, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Orleans Gardens, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
Haynsworth Sinkler Boyd, PA
134 Meeting St., 3rd Floor
Charleston SC 29401

Documents Served: PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLAINTIFFS' MOTION FOR RECUSAL

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
October 28, 2010



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-10-4229

Rhoda G. Rentz, Mary Jane Pike, Eva Marie Reynolds, and Joanne O. Mercy, individually and in their capacities as the Limited Partners of Orleans Gardens, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Orleans Gardens, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

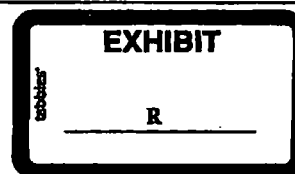
Marvin D. Infinger, JD
Anne Ross Rosen, JD
Haynsworth Sinkler Boyd, PA
134 Meeting St., 3rd Floor
Charleston SC 29401

Documents Served: PLAINTIFFS' AMENDED AND SUPPLEMENTAL MOTION TO ALTER OR AMEND ORDER DENYING PLAINTIFFS' MOTION FOR RECUSAL

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
November 8, 2010



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-10-4229

Rhoda G. Rentz, Mary Jane Pike, Eva Marie Reynolds, and Joanne O. Mercy, individually and in their capacities as the Limited Partners of Orleans Gardens, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Orleans Gardens, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
Haynsworth Sinkler Boyd, PA
134 Meeting St., 3rd Floor
Charleston SC 29401

Documents Served: PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
November 8, 2010



STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1989

Lawrence H. Davis, Jr.; Marvin D. McCarthy; James W. Ivey; and Erin E. Ivey, individually and in their capacities as the Limited Partners of Palmetto Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Palmetto Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

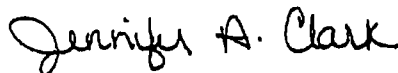
CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
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Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
Haynsworth Sinkler Boyd, PA
134 Meeting St., 3rd Floor
Charleston SC 29401

Documents Served: PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER



Jennifer A. Clark

Beaufort, South Carolina
November 8, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2003-CP-07-0726

Laurance H. Davis, Jr.; Mary Jane R. Pike; Eva Marie Reynolds; and Rhoda G. Rentz, individually and in their capacities as the Limited Partners of Parkview Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
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Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
Haynsworth Sinkler Boyd, PA
134 Meeting St., 3rd Floor
Charleston SC 29401

Documents Served: PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
November 8, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1990

Carolina Management Corporation of
Beaufort, James B. Jackson, Whaley R.
Hinnant, Jr., Mary Gasser Rawl and
Rhoda G. Rentz, individually and in their
capacities as the Limited Partners of
Pinewood Park Apartments, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Pinewood Park Apartments, a South
Carolina Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants.

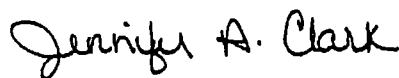
CERTIFICATE OF SERVICE

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Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
Haynsworth Sinkler Boyd, PA
134 Meeting St., 3rd Floor
Charleston SC 29401

Documents Served: PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER



Jennifer A. Clark

Beaufort, South Carolina
November 8, 2010

STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NO. 2005-CP-38-1131

Laurance H. Davis, Jr., Rhoda G. Rentz,
Mortimer M. Weinberg, Jr., Hodge Land
Co., Inc. And Anna Trotter, individually
and in their capacities as the Limited
Partners of Roosevelt Gardens, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Roosevelt Gardens, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants.

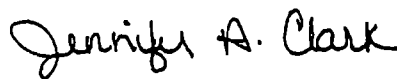
CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
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Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
Haynsworth Sinkler Boyd, PA
134 Meeting St., 3rd Floor
Charleston SC 29401

Documents Served: PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER DENYING PLAINTIFFS' MOTION FOR PROTECTIVE ORDER



Jennifer A. Clark

Beaufort, South Carolina
November 8, 2010

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-10-4229

Rhoda G. Rentz, Mary Jane Pike, Eva Marie Reynolds, and
Joanne O. Mercy, individually and in their capacities as the
Limited Partners of Orleans Gardens, a South Carolina
Limited Partnership. Appellants,

vs.

Orleans Gardens, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

PROOF OF SERVICE

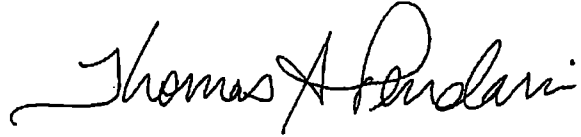
I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that
I have served one (1) copy of NOTICE OF APPEAL on counsel for Respondents, by depositing
a copy of the same in the United States Mail, postage prepaid, on the 28th day of October,
2010 addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Ann Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston, SC 29401



PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with a long horizontal line extending from the start of the name.

Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
Beaufort, SC 29902-5066
(843) 524.9500 tel.
(843) 524.9501 fax.
Thomas@PendarvisLaw.com

October 28, 2010

Beaufort, SC 29902

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-10-4229

Rhoda G. Rentz, Mary Jane Pike, Eva Marie Reynolds, and
Joanne O. Mercy, individually and in their capacities as the
Limited Partners of Orleans Gardens, a South Carolina
Limited Partnership. Appellants,

vs.

Orleans Gardens, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

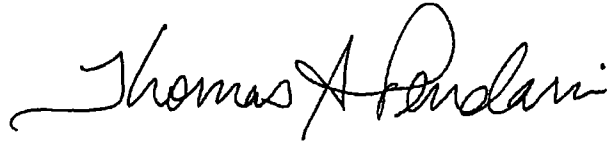
PROOF OF SERVICE

I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that
I have served one (1) copy of the AMENDED NOTICE OF APPEAL on counsel for Respondents,
by depositing a copy of the same in the United States Mail, postage prepaid, on the 8th day
of November, 2010 addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Ann Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston, SC 29401

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with a large initial 'T' and 'P'.

Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
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(843) 524.9500 tel.
(843) 524.9501 fax.
Thomas@PendarvisLaw.com

November 8, 2010

Beaufort, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-07-1990

Carolina Management Corporation of Beaufort, James B.
Jackson, Whaley R. Hinnant, Jr., Mary Gasser Rawl and
Rhoda G. Rentz, individually and in their capacities as the
Limited Partners of Pinewood Park Apartments, a South
Carolina Limited Partnership. Appellants,

vs.

Pinewood Park Apartments, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

PROOF OF SERVICE

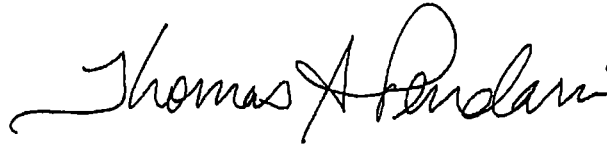
I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that
I have served one (1) copy of NOTICE OF APPEAL on counsel for Respondents, by depositing
a copy of the same in the United States Mail, postage prepaid, on the 3rd day of December,
2010 addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Ann Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston, SC 29401



PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with the first name "Thomas" and last name "Pendarvis" clearly legible.

Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
Beaufort, SC 29902-5066
(843) 524.9500 tel.
(843) 524.9501 fax.
Thomas@PendarvisLaw.com

December 3, 2010

Beaufort, SC 29902

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2003-CP-07-726

Laurance H. Davis, Jr., Mary Jane R. Pike, Eva Marie
Reynolds and Rhoda G. Rentz, individually and in their
capacities as the Limited Partners of Parkview Apartments,
a South Carolina Limited Partnership. Appellants,

vs.

Parkview Apartments, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

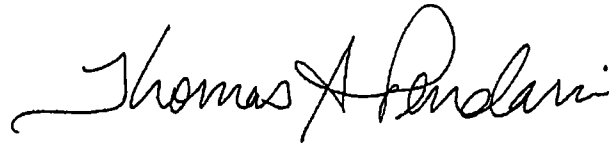
PROOF OF SERVICE

I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that
I have served one (1) copy of NOTICE OF APPEAL on counsel for Respondents, by depositing
a copy of the same in the United States Mail, postage prepaid, on the 3rd day of December,
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Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Ann Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston, SC 29401

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
Beaufort, SC 29902-5066
(843) 524.9500 tel.
(843) 524.9501 fax.
Thomas@PendarvisLaw.com

December 3, 2010

Beaufort, SC 29902

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-07-1989

Laurance H. Davis, Jr., Marvin D. McCarthy, James W. Ivey
and Erin E. Ivey, individually and in their capacities as the
Limited Partners of Palmetto Apartments, a South Carolina
Limited Partnership. Appellants,

vs.

Palmetto Apartments, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

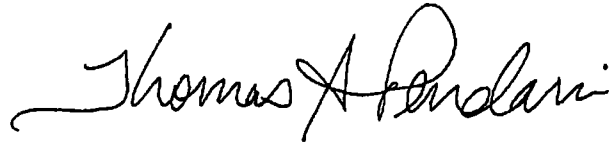
PROOF OF SERVICE

I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that
I have served one (1) copy of NOTICE OF APPEAL on counsel for Respondents, by depositing
a copy of the same in the United States Mail, postage prepaid, on the 3rd day of December,
2010 addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Ann Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston, SC 29401

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with a large initial 'T' and 'P'.

Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
Beaufort, SC 29902-5066
(843) 524.9500 tel.
(843) 524.9501 fax.
Thomas@PendarvisLaw.com

December 3, 2010

Beaufort, SC 29902

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-38-1131

Laurance H. Davis, Jr., Rhoda G. entz, Mortimer M. Weinberg, Jr.,
Hodge Land Co., Inc. and Anna Trotter, individually and in their
capacities as the Limited Partners of Roosevelt Gardens, a South
Carolina Limited Partnership. Appellants,

vs.

Roosevelt Gardens, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

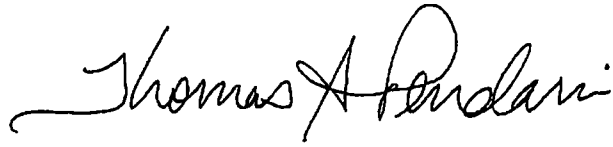
PROOF OF SERVICE

I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that
I have served one (1) copy of NOTICE OF APPEAL on counsel for Respondents, by depositing
a copy of the same in the United States Mail, postage prepaid, on the 3rd day of December,
2010 addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Ann Ross Rosen, J.D.
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134 Meeting Street, 3rd Floor
Charleston, SC 29401

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with a large initial "T" and "P".

Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
Beaufort, SC 29902-5066
(843) 524.9500 tel.
(843) 524.9501 fax.
Thomas@PendarvisLaw.com

December 3, 2010

Beaufort, SC 29902

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO 2003-CP-07-0726

Carolina Management Corporation of
Beaufort, James B Jackson, Whaley R
Hinnant, Jr, Mary Gasser Rawl, and
Rhoda G Rentz, individually and in their
capacities as the Limited Partners of
Parkview Apartments, a South Carolina
Limited Partnership,

Plaintiffs,

vs

Parkview Apartments, a South Carolina
Limited Partnership, Apartment
Investment and Management Company
a/k/a AIMCO, Insignia Financial Group,
Inc, AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U S
Shelter Corporation, ISTC Corporation,
N BartonTuck, Jr, and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants

CONSOLIDATED CASES

2005-CP-07-1990 (Beaufort)
2005-CP-07-1989 (Beaufort)
2005-CP-10-4229 (Charleston)
2005-CP-38-1131 (Orangeburg)

FILED
2006 SEP -5 PM 2:12
JULIE J. ARMSTRONG
CLERK OF COURT

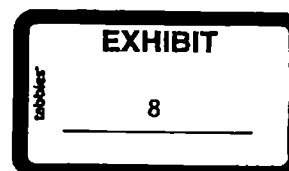
TO ELLIS M JOHNSTON, II, J D, JESSE C BELCHER, J D, AND CALVIN T VICK, J D, ATTORNEYS
FOR DEFENDANTS

PLAINTIFFS' COMBINED MEMORANDUM OF LAW IN OPPOSITION TO

**DEFENDANTS' MOTIONS TO DISMISS
COUNTS 1 THROUGH 7**

AND

**DEFENDANTS' MOTIONS TO DISMISS FOR IMPROPER VENUE
PURSUANT TO SCRCP 12(B)(3), OR IN THE ALTERNATIVE, TO S.C.
CODE ANN. § 15-7-30 AND § 15-7-100**



business" provisions in the amended venue statute apply to any of the limited partnerships at issue in these consolidated cases. The express terms of the limited partnership agreement control, venue is proper Beaufort County. Defendants motion to change venue should be denied.

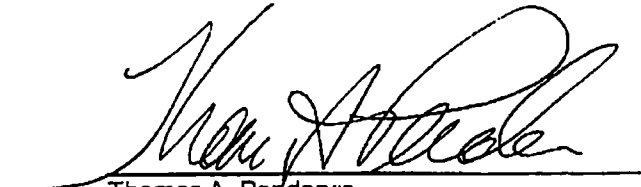
CONCLUSION

Defendants' motions to dismiss and motions to change venue should be denied, and this matter should proceed to trial on the merits in the same venue required by all of the limited partnership agreements.

Respectfully submitted,

Joel D. Bailey
THE BAILEY LAW FIRM, P.A.
PO Box 1437
1001 Bay St.
Beaufort SC 29901-1437
843 525 6090 Tel
843 525 6070 Fax
baileylawfirm@charter.net

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, appearing to read 'Thomas A. Pendarvis', is written over a horizontal line.

Thomas A. Pendarvis
500 Carteret St Ste A
Beaufort SC 29902-5066
843 524 9500 Tel
843 524 9501 Fax
Thomas@PendarvisLaw.com

Attorneys for Plaintiffs

Beaufort, South Carolina

August 25, 2006

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO 05-CP-10-4229

Rhonda G Rentz, Mary Jane Pike, Eva
Marie Reynolds, and Joanne O Mercy,
individually and in their capacities as the
Limited Partners of Orleans Gardens, a
South Carolina Limited Partnership,

Plaintiffs,

vs

Orleans Gardens, a South Carolina
Limited Partnership, Apartment
Investment and Management Company
a/k/a AIMCO, Insignia Financial Group,
Inc, AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S
Shelter Corporation, ISTC Corporation,
N BartonTuck, Jr, and John Doe, a
genenc designation for a party or parties
whose true identity is unknown,

Defendants

CERTIFICATE OF SERVICE

FILED
2006 SEP -5 PM 2:12
JULIE J. ARMSTRONG
CLERK OF COURT

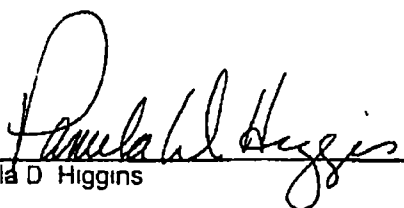
I, Pamela D Higgins, paralegal for PENDARVIS LAW OFFICES, P C hereby certify that
I have served the documents listed below upon all counsel of record by e-mail, telecopier
and mailing a copy of same, postage prepaid and return address clearly indicated on said
envelope, to said counsel at the following address

COUNSEL SERVED

Ellis M Johnston, II, J D
Calvin T Vick, Jr, J D
Haynsworth Sinkler Boyd, P A
P O Box 2048
Greenville SC 29602

DOCUMENTS SERVED

- 1 PLAINTIFFS' COMBINED MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS COUNTS 1 THROUGH 7
AND DEFENDANTS' MOTIONS TO DISMISS FOR IMPROPER VENUE PURSUANT TO
SCRCP 12(b)(3), OR IN THE ALTERNATIVE, TO S C CODE ANN. § 15-7-30 AND
§ 15-7-100, AND
- 2 CERTIFICATE OF SERVICE


Pamela D Higgins

Beaufort, South Carolina

August 25, 2006

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort, Charleston, and Orangeburg Counties

Doyet A. Early, III, Circuit Court Judge

Beaufort County 03-CP-07-726
Beaufort County 05-CP-07-1989
Beaufort County 05-CP-07-1990
Charleston County 05-CP-10-4229
Orangeburg County 05-38-1131

RECEIVED
SEP 10 2009
SC Court of Appeals

Laurance H. Davis, Jr., et al., ... Appellants,

v.

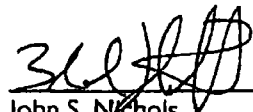
Parkview Apartments, et al., ... Respondents.

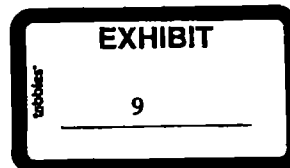
NOTICE OF APPEAL

The plaintiffs in these consolidated cases appeal the order of the Honorable Doyet A. Early, III, dated July 28, 2009. The plaintiffs below, who are the Appellants in this action, received written notice of the entry of the order August 14, 2009.

Respectfully submitted,

September 10, 2009


John S. Nichols
Blake A. Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC
Post Office Box 7965
Columbia, South Carolina 29202
(803) 779-7599
(803) 779-8995 (facsimile)



jsnichols@bntdlaw.com
bhewitt@bntdlaw.com
(Appellate counsel for Appellants)

Thomas A. Pendarvis, J.D.
Pendarvis Law Offices, P.C.
500 Carteret St., Ste. A
Beaufort, SC 29902
(843) 524-9500
(843) 524-9501 (facsimile)
Thomas@PendarvisLaw.com
(Trial counsel for Appellants)

Joel D. Bailey
The Bailey Law Firm, P.A.
P.O. Box 1437
Beaufort, SC 29901-1437
(843) 525-6090
(843) 525-6070 (facsimile)
Baileylawfirm@charter.net
(Trial counsel for Appellants)

Other counsel of record

Ellis M. Johnston
Calvin T. "Ted" Vick, Jr.
Haynsworth Sinkler Boyd, P.A.
P.O. Box 2048
Greenville, SC 29602-2048
(864) 240-3324
(864) 240-3336 (facsimile)
ejohnston@hsblawfirm.com
tvick@hsblawfirm.com

(Counsel for Respondents)

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort, Charleston, and Orangeburg Counties

Doyet A. Early, III, Circuit Court Judge

Beaufort County 03-CP-07-726
Beaufort County 05-CP-07-1989
Beaufort County 05-CP-07-1990
Charleston County 05-CP-10-4229
Orangeburg County 05-38-1131

RECEIVED
SEP 10 2009
SC Court of Appeals

Laurance H. Davis, Jr., et al. Appellants,

v.

Parkview Apartments, et al., ... Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, she served counsel
for the Respondents, with a copy of the Notice of Appeal by mailing copies of the same by
United States Mail with first class postage prepaid to the following address:

C. Theodore Vick, Jr., Esquire
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
Post Office Box 2048
Greenville, South Carolina 29602-2048

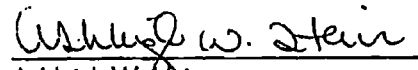
The undersigned hereby certifies she also served the Beaufort, Charleston, and Orangburg
County Clerk of Court with a copy of the Notice of Appeal by mailing a copy of the same by
United States Mail with first class postage prepaid to the following addresses:

The Honorable Jerri Roseneau
Beaufort County Clerk of Court
Post Office Drawer 1128
Beaufort, South Carolina 29901

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad Street, #106
Charleston, South Carolina 29401

The Honorable Lisa W. Mizell
Orangburg County Clerk of Court
Post Office Drawer 9000
Orangburg, South Carolina 29116

September 10, 2009
Columbia, South Carolina


Ashleigh W. Hair

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-38-1131

Laurance H. Davis, Jr., Rhoda G. Rentz, Mortimer M.
Weinberg, Jr., Hodge Land Co., Inc. and Anna Trotter,
individually and in their capacities as the Limited Partners
of Roosevelt Gardens, a South Carolina Limited Partnership. Appellants,

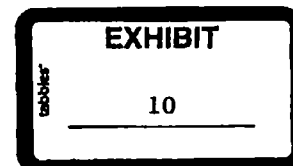
vs.

Roosevelt Gardens, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

AMENDED NOTICE OF APPEAL

Appellants Laurance H. Davis, Jr., Rhoda G. Rentz, Mortimer M. Weinberg, Jr.,
Hodge Land Co., Inc. and Anna Trotter appeal the following orders:

1. ORDER denying Plaintiffs' motion to compel #6, dated August 18, 2008, a
copy of which is attached as Exhibit 1.
2. ORDER DENYING PLAINTIFFS' MOTION TO COMPEL #2, dated December 17,
2008, a copy of which is attached as Exhibit 2.
3. ORDER GRANTING DEFENDANTS' MOTION TO COMPEL, DATED NOVEMBER 6, 2008,



- dated March 3, 2009, a copy of which is attached as Exhibit 3.
4. ORDER GRANTING IN PART AND DENYING IN PART PLAINTIFFS' MOTION TO COMPEL, DATED JULY 29, 2005, dated March 3, 2009, a copy of which is attached as Exhibit 4.
 5. ORDER ADOPTING FINDINGS AND CONCLUSIONS OF SPECIAL MASTER CLARY, dated June 2, 2009, a copy of which is attached as Exhibit 5.
 6. ORDER DENYING PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER GRANTING DEFENDANTS' MOTION TO COMPEL DATED NOVEMBER 6, 2008, dated June 16, 2009, a copy of which is attached as Exhibit 6.
 7. ORDER AMENDING COURT'S ORDER DATED JUNE 2, 2009, dated July 28, 2009, a copy of which is attached as Exhibit 7.
 8. ORDER GRANTING DEFENDANTS' TWO MOTIONS FOR SANCTIONS, FINDING PLAINTIFFS IN CONTEMPT OF COURT, AND DISMISSING THE ABOVE-CAPTIONED ACTIONS AS SANCTIONS FOR PLAINTIFFS' CONTEMPT, dated April 6, 2010, a copy of which is attached as Exhibit 8.
 9. ORDER denying Plaintiffs' motion for reconsideration, dated September 16, 2010, filed on September 20, 2010, and receipt of written notice of entry of which was received by Counsel for Appellants on October 1, 2010, a copy of which is attached as Exhibit 9.
 10. ORDER appointing the Honorable Doyet A. Early, III to hear and decide all matters pertaining to these cases, dated March 7, 2006, issued by Chief Justice Jean Hoefer Toal, a copy of which is attached as Exhibit 10.
 11. ORDER denying Plaintiffs' motion for recusal, dated October 7, 2010.

Although Appellants have not received written notice of entry of this Order, it is included with this Amended Notice of Appeal in an abundance of caution, a copy of this Order filed in another matter is attached as Exhibit 11.

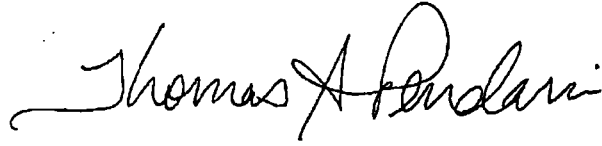
12. ORDER denying Plaintiffs' motion for protective order (issued by the Honorable Doyet A. Early, III), dated October 22, 2010, filed on October 25, 2010, and receipt of written notice of entry of which was received by Counsel for Appellants on November 8, 2010, a copy of which is attached as Exhibit 12.
13. ORDER denying Plaintiffs' motion to alter or amend order denying Plaintiffs' motion for protective order and the Order denying Plaintiffs' motion for recusal, dated December 11, 2010. Although Appellants have not received written notice of entry of this Order, it is included with this Amended Notice of Appeal in an abundance of caution, a copy of this Order filed in another matter is attached as Exhibit 13.

The above Orders, except for Exhibit 10, were issued by the Honorable Doyet A. Early, III.

Respectfully submitted,

Joel D. Bailey
THE BAILEY LAW FIRM, P.A.
PO Box 1437
Beaufort, SC 29901-1437
(843) 525-6090 tele
(843) 525-6070 fax
baileylawfirm@charter.net

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
Beaufort, SC 29902-5066
843.524.9500 tel
843.524.9501 fax
Thomas@PendarvisLaw.com

Counsel for Appellants

January 28, 2011

Beaufort, South Carolina

OTHER COUNSEL OF RECORD:

Ellis M. Johnston, Jr., J.D.
Calvin T. Vick, J.D.
Jesse C. Belcher, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
P.O. Box 2048
Greenville SC 29602

Marvin D. Infinger, J.D.
Anne Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
134 Meeting Street, 3rd Floor
Charleston SC 29401



RECEIVED DEC -1 2010

State of South Carolina
The Circuit Court of the Second Judicial Circuit

Doyet A. Early, III
Judge

Post Office Box 80
Bamberg, SC 29003
Phone: (803) 245-4004
Fax: (803) 245-2983
dearlyj@sccourts.org

September 16, 2010

The Honorable Winnifa Brown-Clark
Post Office Box 9000
Orangeburg, South Carolina 29115

Re: Laurance H. Davis, Jr. et al v. Roosevelt Gardens, 05-CP-38-1131

Dear Ms. Clark:

Please find enclosed for filing my order in the above case. Please file and serve all interested parties.

Sincerely,

DA Early III
D. A. Early, III

DAE:khc
Enclosure

cc: Joel Bailey, Esquire
Ellis Johnston, Esquire
Thomas Pendarvis, Esquire

ATTEST: TRUE COPY
Winnifa B. Clark
CLERK OF COURT
ORANGEBURG COUNTY, SC



STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.
Parkview Apartments, a South Carolina
Limited Partnership, *et al.*, Defendants.

Beaufort County
C.A. No. 2003-CP-07-726

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.
Roosevelt Gardens, a South Carolina
Limited Partnership, *et al.*, Defendants.

Orangeburg County
C.A. No. 2005-CP-38-1131

Rhonda G. Rentz, *et al.*, Plaintiffs,
v.
Orleans Gardens, a South Carolina
Limited Partnership, *et al.*, Defendants.

Charleston County
C.A. No. 2005-CP-10-4229

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.
Palmetto Apartments, a South Carolina
Limited Partnership, *et al.*, Defendants.

Beaufort County
C.A. No. 2005-CP-07-1989

Carolina Management Corporation of
Beaufort, *et al.*, Plaintiffs,
v.
Pinewood Park Apartments, a South Carolina
Limited Partnership, *et al.*, Defendants.

Beaufort County
C.A. No. 2005-CP-07-1990

ORDER

Plaintiffs have filed a motion seeking reconsideration of this court's order dated April 6, 2010, pursuant to Rule 59, SCRCF. The order was signed after Plaintiffs repeatedly failed to comply with orders dealing with discovery dated March 3, 2009 and July 28, 2009. Each of those orders have resulted from numerous hearings, motions, memoranda, arguments and rulings, including rulings denying Plaintiff's Rule 59/60 motions seeking reconsideration of these orders.

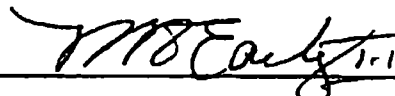
JAE
#1

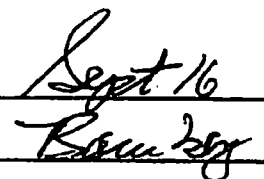
ATTEST: TRUE COPY
Wingia B. Clark
CLERK OF COURT
ORANGEBURG COUNTY, SC

The court has carefully reconsidered all of Plaintiff's arguments in support of their motion, revisited all prior orders and the cases, memoranda and exhibits presented at each hearing; the court is still of the opinion that the previous orders were a correct application of the law to this factual matter.

Therefore Plaintiff's motion is DENIED.

IT IS SO ORDERED.


The Honorable Doyet A. Early, III


Ben 289, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-38-1131

Laurance H. Davis, Jr., Rhoda G. Rentz, Mortimer M. Weinberg, Jr.,
Hodge Land Co., Inc. and Anna Trotter, individually and in their
capacities as the Limited Partners of Roosevelt Gardens, a South
Carolina Limited Partnership. Appellants,

vs.

Roosevelt Gardens, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

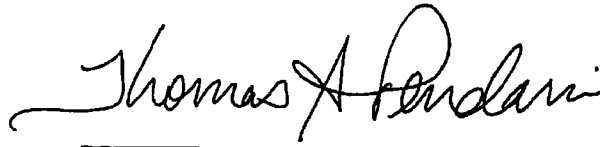
PROOF OF SERVICE

I, Thomas A. Pendarvis, an attorney with PENDARVIS LAW OFFICES, P.C., certify that
I have served one (1) copy of AMENDED NOTICE OF APPEAL on counsel for Respondents, by
depositing a copy of the same in the United States Mail, postage prepaid, on the 28th day
of January, 2011 addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Ann Ross Rosen, J.D.
NEXSEN PRUET, PA
PO Box 486
Charleston, SC 29402

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with a large initial "T" and "P".

Thomas A. Pendarvis (SC Bar # 064918)
500 Carteret St., Suite A
Beaufort, SC 29902-5066
(843) 524.9500 tel.
(843) 524.9501 fax.
Thomas@PendarvisLaw.com

January 28, 2011

Beaufort, SC 29902

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., et al., Plaintiffs)
v.)
Parkview Apartments, a South Carolina Limited)
Partnership, et al., Defendants.)

Beaufort County
C/A # 03-CP-07-726

Laurance H. Davis, Jr., et al., Plaintiffs)
v.)
Roosevelt Gardens, a South Carolina Limited)
Partnership, et al., Defendants.)

Orangeburg County
C/A # 05-CP-38-1131

Rhoda G. Rentz, et al., Plaintiffs)
v.)
Orleans Gardens, a South Carolina Limited)
Partnership, et al., Defendants.)

Charleston County
C/A # 05-CP-10-4229

Laurance H. Davis, Jr., et al., Plaintiffs)
v.)
Palmetto Apartments, a South Carolina Limited)
Partnership, et al., Defendants.)

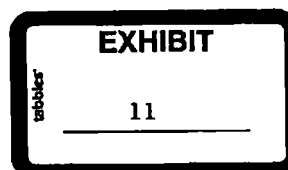
Beaufort County
C/A # 05-CP-07-1989

Carolina Management Corporation of Beaufort,)
et al., Plaintiffs)
v.)
Pinewood Park Apartments, a South Carolina)
Limited Partnership, et al., Defendants.)

Beaufort County
C/A # 05-CP-07-1990

**NOTICE OF MOTION AND MOTION FOR RECONSIDERATION,
ALTERATION OR AMENDMENT**

**TO: ELLIS M. JOHNSTON, II, CALVIN T. VICK, MARVIN INFINGER AND ANNE
ROSS ROSEN, AND THE DEFENDANTS ABOVE-NAMED**



YOU WILL PLEASE TAKE NOTICE that the undersigned, as counsel for the Plaintiffs in the above-captioned matters, will and hereby does move, pursuant to S.C.R.C.P. 59, for an Order of this Court granting relief as hereinafter set forth from the Order Granting Defendants' Two Motions For Sanctions, Finding Plaintiffs in Contempt of Court, and Dismissing the Above-Captioned Actions as Sanctions for Plaintiffs' Contempt, said Order being dated the 6th day of April, 2010 and filed in the Office of the Clerk of Court for Beaufort County on April 9, 2010. The undersigned first received a signed copy and notice of the entry of this Order by the Beaufort County Clerk of Court *via* e-mail from Ellis M. Johnston, II dated April 13, 2010. The undersigned subsequently received a signed copy of the Order and notice of the entry of this Order by the Beaufort County Clerk of Court *via* U.S. mail from Ellis M. Johnston, II on April 15, 2010.

This motion is subject to and not in waiver of the Plaintiffs' pending Motion for Recusal and Vacation of Orders and Motion for Protective Order; Plaintiffs specifically reserve all positions or objections stated in any prior motions or submissions concerning the qualification of Judge Doyet A. Early III to issue rulings or preside over proceedings in these cases, and that his participation in this litigation is prohibited by the Canons of Judicial Ethics and the existing laws and constitutions of this state and of the United States of America.

The grounds for this motion are hereinafter set forth in this document, as well as in any affidavits submitted in support hereof, including but not limited to any affidavit filed with this motion; in that regard, an affidavit of Thomas Pendarvis, Esquire, co-counsel for the Plaintiffs, is being submitted under separate cover due to the volume of its contents and attachments. The contents of that affidavit are hereby incorporated by reference herein as additional grounds for this motion, and it is deemed to be an affidavit submitted herewith in support of this motion as fully and

completely as if the affidavit physically accompanied this motion. The Plaintiffs further assert that the grounds for this motion are also contained in any transcripts of proceedings held in this or any related matter; any depositions or other discovery conducted in this litigation; any rulings and orders issued in this litigation; any memoranda of law submitted in this litigation; and/or any related motions, correspondence, e-mails, or other relevant documents which have been submitted, produced or identified in this litigation.

For the reasons hereinafter set forth, the Plaintiffs seek relief from the said Order in the following particulars:

A. The Plaintiffs seek reconsideration and vacation of the said Order in its entirety, on the basis that (a) it is primarily based upon Plaintiffs' failure to comply with a prior Order of Judge Early which modified and/or eliminated the rulings of the Special Master appointed in this litigation, and that such prior Order exceeded the jurisdiction of the trial judge under S.C.R.C.P. 53; (b) it is tainted in its entirety due to the bias and prejudice of the issuing judge, as demonstrated herein and in the Plaintiffs' pending Motion for Recusal and Vacation of Orders; (c) it is based upon erroneous, misleading and inaccurate findings of fact outside the evidence; (d) it is based upon errors and misapplications of existing law; (e) it is the product of at least one *ex parte* communication between Judge Early and Defendants' counsel, Calvin T. Vick, which is specifically prohibited under the law of this state.

B. The Plaintiffs alternatively seek reconsideration, alteration and/or amendment of the factual findings set forth in the said Order on the ground that they are not accurate, are incomplete, are outside the evidence presented and/or present a biased and unfair representation of the acts or conduct referenced therein, including, *inter alia*, the following particulars:

Respectfully submitted,

THE BAILEY LAW FIRM, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort SC 29901-1437
843.525.6090 Tel.
843.525.6070 Fax.
baileylawfirm@charter.net

Thomas A. Pendarvis, J.D. (SC Bar # 064918)
PENDARVIS LAW OFFICES, P.C.
500 Carteret St Ste A
Beaufort SC 29902-5066
843.524.9500 Tel.
843.524.9501 Fax.
Thomas@PendarvisLaw.com

Attorneys for the Plaintiffs

By 
Joel D. Bailey (SC Bar # 471)

Beaufort, South Carolina
April __, 2010

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Parkview Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A # 03-CP-07-726

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Roosevelt Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Orangeburg County
CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)
-vs-)
Orleans Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Charleston County
CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Palmetto Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A #2005-CP-07-1989

Carolina Management Corporation of)
Beaufort, *et al*, Plaintiffs,)
-vs-)
Pinewood Park Apartments, a South)
Carolina Limited Partnership, *et al*,)
Defendants.)

Beaufort County
C/A # 2005-CP-07-1990

CERTIFICATE OF MAILING

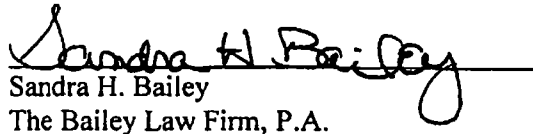
I hereby certify that I have served the Plaintiffs' Motion for Reconsideration, Alteration or Amendment, by depositing a copy in the United States Mail, postage prepaid, on April 22, 2010, addressed to the following attorneys of record:

Ellis M. Johnston, II
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Calvin T. Vick
PO Box 2048
Greenville, SC 29602

Anne Ross Rosen
134 Meeting Street, 3rd Floor
Charleston, SC 29401


Sandra H. Bailey
The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort, South Carolina 29901-1437

April 21, 2010



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION
510 RIBAULT ROAD

POST OFFICE BOX 1457 • BEAUFORT, SOUTH CAROLINA 29901-1457

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 845-525-6090
FAX: 845-525-6070

September 27, 2010
VIA U.S. MAIL and EMAIL

Honorable Doyet A. Early, III
Post Office Box 90
Bamberg, South Carolina 29003-0090

Re: Davis, et al. vs. Parkview Apartments Limited Partnership, et al. (C/A # 03-CP-07-726)
Rentz, et al. vs. Orleans Gardens, et al. (C/A # 05-CP-10-4229)
Davis, et al. vs. Palmetto Apartments, et al. (C/A # 05-CP-07-1989)
Carolina Management Corporation, et al. vs. Pinewood Park Apartments, et al.
(C/A # 05-CP-07-1990)
Laurance H. Davis, Jr., et al. vs. Roosevelt Gardens, et al. (C/A # 05-CP-38-1131)

Dear Judge Early:

In a recent telephone conference call, you stated that you were denying the Plaintiff's pending Rule 59 motion, and would be issuing a written order to that effect. You also stated that you would issue separate rulings/orders with respect to the other outstanding motions, including the pending motion for recusal. I believe that you have signed an order with respect to the Rule 59 motion, but I am not aware of any subsequent orders relating to the recusal and any other outstanding motions.

Obviously, the Plaintiffs will be appealing your order denying their Rule 59 motion. Assuming that you will also be denying their other motions or requests, we ask that you issue written orders on these as soon as possible. By issuing separate orders at different times, the appeal time limits will be different. All of these issues need to be included in the Plaintiffs' appeal, and we therefore ask that you give priority to this request in order that the appellate process will not be compromised.

Sincerely,

THE BAILEY LAW FIRM, P.A.

Joel D. Bailey
JDB/lom

cc: Ellis M. Johnston, II
Calvin T. Vick
Marvin D. Infinger
Anne Ross Rosen
Thomas A. Pendarvis

Haynsworth Sinkler Boyd, P.A.

Date Rec'd 9/29/10

CM # 11471.0010

Docketed

FILED CIV. 845, HGC, SL, MLS

EXHIBIT

tabbies
12

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2010180087

Laurance H. Davis, Jr., Marvin D. McCarthy, James W.
Ivey, and Erin E. Ivey, individually and in their
capacities as the Limited Partners of Palmetto Apartments,
a South Carolina Limited Partnership, ... Appellants,

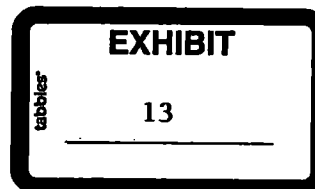
v.

Palmetto Apartments, a South Carolina Limited Partnership,
Apartment Investment and Management Company a/k/a
AIMCO, Insignia Financial Group, Inc., AmReal Corporation
a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation, ISTC Corporation, N. Barton Tuck, Jr., and John
Doe, a generic designation for a party or parties whose true
identity is unknown, ... Respondents.

AFFIDAVIT OF ELLIS M. JOHNSTON, II IN SUPPORT OF REPLY MEMORANDUM
IN SUPPORT OF RESPONDENTS' MOTION TO DISMISS

Personally appeared before me, Ellis M. Johnston, II, who, being duly sworn,
deposes and states as follows:

1. My name is Ellis M. Johnston, II. I am over the age of 18 years and am
competent to testify to the matters contained herein based upon personal knowledge
2. I am a resident and citizen of Greenville, South Carolina.



3. I am an attorney in the State of South Carolina and have been continuously licensed to practice law in this state since 1975. I am a shareholder in the law firm of Haynsworth Sinkler Boyd, P.A. located in Greenville, South Carolina. I represent the Defendants in the above-captioned cases and have been continuously involved as lead counsel since the first suit was filed in April, 2003

4. I have personal knowledge of the following Exhibits to the Reply Memorandum in Support of Respondents' Motion to Dismiss (and Motion to Dismiss), which are attached to the Reply as indicated below. The documents are true and accurate copies of documents maintained and reviewed in the normal course of business.

(a) November 14, 2008 letter enclosing the first page, **Privilege Log**, signature page and Certificate of Service for **Plaintiffs' Responses to Defendants' Discovery Requests to all Plaintiffs dated August 28, 2008**, from Thomas A. Pendarvis, J.D. to Calvin T. Vick and copying the undersigned, attached to the Reply as Exhibit 1;

(b) January 22, 2009 first page, signature page and Certificate of Mailing for **Plaintiffs' Supplemental Answers to Defendants' Interrogatories and Plaintiffs' Supplemental Responses to Defendants' Request to Produce** from Joel D. Bailey to the undersigned, attached to the Reply as Exhibit 2;

(c) January 26, 2009 first page, signature page and Certificate of Service for **Plaintiffs' Supplemental Responses to Defendants' Discovery Requests to all Plaintiffs dated August 28, 2008** from Thomas A. Pendarvis to the undersigned, attached to the Reply as Exhibit 3;

(d) August 24, 2009 first page, signature page and Certificate of Service for **Plaintiffs' Second Supplemental Responses to Defendants' Discovery Requests to All**

Plaintiffs dated August 28, 2008 from Thomas A. Pendarvis to the undersigned, attached to the Reply as Exhibit 4;

(e) January 25, 2010 letter, front page, signature page and Certificate of Mailing for **Plaintiffs' Third Supplemental Responses to Defendants' Discovery Requests to All Plaintiffs dated August 28, 2008** from Joel D. Bailey to Judge Early and copying the undersigned, attached to the Reply as Exhibit 5;

(f) January 5, 2009 letter enclosing **Plaintiffs' Supplemental Privilege Log** from Thomas A. Pendarvis to Judge Clary and copying the undersigned, attached to the Reply as Exhibit 6;

(g) August 25, 2006 front page, signature page and Certificate of Service for **Plaintiffs' Combined Memorandum of Law in Opposition to Defendants' Motions to Dismiss Counts 1 Through 7 and Defendants' Motions to Dismiss for Improper Venue Pursuant to SCRPC 12(B)(3), or in the Alternative, to S.C. Code Ann. §15-7-30 and § 15-7-100** from Thomas A. Pendarvis to the undersigned, attached to the Reply as Exhibit 8;

(h) September 10, 2009 **Notice of Appeal** and Proof of Service from Blake A. Hewitt to the undersigned, attached to the Reply as Exhibit 9;

(i) January 28, 2011 **Amended Notice of Appeal**, Proof of Service along with its Exhibit 9 from Thomas A. Pendarvis to the Undersigned, attached to the Reply as Exhibit 10;

(j) April 22, 2010, **Motion for Reconsideration**, cover page, pages 2 and 3, signature page and Proof of Service, which are part of Exhibit C to Respondents' Motion to Dismiss attached to the Reply as Exhibit 11; and

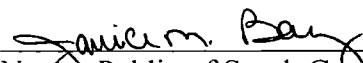
(k) September 27, 2010 letter requesting Judge Early issue Orders from Joel D. Bailey to Judge Early and copying the undersigned, attached to the Reply as Exhibit 12.

5. The documents attached to the Reply as Exhibits 1 through 12 are offered in reply to Plaintiffs' Return to Respondents' Motion to Dismiss and the affidavits filed by their attorneys and staff in support of the Return.



Ellis M. Johnston, II

Subscribed and sworn to me
This 8th day of February, 2011



Notary Public of South Carolina
My Commission expires on Dec 5, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2010180087

Laurance H. Davis, Jr., Marvin D. McCarthy, James W.
Ivey, and Erin E. Ivey, individually and in their
capacities as the Limited Partners of Palmetto Apartments,
a South Carolina Limited Partnership, ... Appellants,

v.

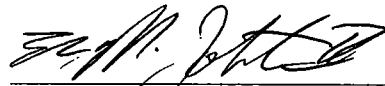
Palmetto Apartments, a South Carolina Limited Partnership,
Apartment Investment and Management Company a/k/a
AIMCO, Insignia Financial Group, Inc., AmReal Corporation
a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation, ISTC Corporation, N. Barton Tuck, Jr., and John
Doe, a generic designation for a party or parties whose true
identity is unknown, ... Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, he served
counsel for the Appellants with a copy of *REPLY MEMORANDUM IN SUPPORT OF*
RESPONDENTS' MOTION TO DISMISS by mailing copies of the same by United States
Mail with first class postage prepaid to the following addresses:

Thomas A. Pendarvis
Pendarvis Law Offices, P.C.
500 Carteret Street, Suite A
Beaufort, South Carolina 29902-5066

Joel D. Bailey
The Bailey Law Firm, P.A.
PO Box 1437
Beaufort, South Carolina 29901-1437



Ellis M. Johnston, II

February 8, 2011
Greenville, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2010180087

2011
COURT OF APPEALS

Laurance H. Davis, Jr., Marvin D. McCarthy, James W. Ivey, and Erin E. Ivey, individually and in their capacities as the Limited Partners of Palmetto Apartments, a South Carolina Limited Partnership, ... Appellants,

v.

Palmetto Apartments, a South Carolina Limited Partnership, Apartment Investment and Management Company a/k/a AIMCO, Insignia Financial Group, Inc., AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation, ISTC Corporation, N. Barton Tuck, Jr., and John Doe, a generic designation for a party or parties whose true identity is unknown, ... Respondents.

RESPONDENTS', MARVIN INFINGER'S, ANNE ROSEN'S, AND
JESSE BELCHER'S MOTION PURSUANT TO S.C.A.C.R. 264

Ellis M. Johnston, II
Calvin T. Vick, Jr.
HAYNSWORTH SINKLER BOYD, PA
Post Office Box 2048
Greenville, SC 29602
Telephone: (864) 240-3200
Facsimile: (864) 240-3336

In light of Appellants' newly found belief (**Exhibit 1**) that it is necessary for them to serve Marvin Infinger, Anne Rosen, and Jesse Belcher with all documents related to the within appeal in order to comply with Rule 5, SCRCR (because Mr. Infinger, Mrs. Rosen and Mr. Belcher are allegedly "counsel of record"),¹ Respondents, Mr. Infinger, Mrs. Rosen, and Mr. Belcher file the within Motion pursuant to Rule 264, SCACR. Appellants' belief is "newly found" because, contrary to their contention in their letter,

Accordingly, Mr. Pendarvis and I have provided these attorneys with copies of all communications in the lower court and concerning this appeal, as we have never received a written order relieving them as counsel in this Court or in the lower court. (Exhibit 1)

- Appellants acknowledged in January, 2009 that Mr. Infinger, Mrs. Rosen, and Mr. Belcher were no longer working on the matter (**Exhibit 2**);
- Since that time, Appellants on numerous occasions did not serve pleadings on Mr. Infinger, Mrs. Rosen, or Mr. Belcher, as required by the Rules if, as Appellants contend, they are counsel of record (**Exhibit 3**)²;
- Appellants apparently did not consider Mr. Infinger, Mrs. Rosen, or Mr. Belcher to be counsel of record when they appealed this matter in September, 2009 (**Exhibit 4**);
- Appellants apparently did not consider Mr. Infinger, Mrs. Rosen, or Mr. Belcher to be counsel of record when they petitioned to the South Carolina Supreme Court in September, 2009 for a Writ of Prohibition or in the Alternative Certiorari (**Exhibit 5**);
- The clerk's office records do not reflect that Mr. Infinger, Mrs. Rosen or Mr. Belcher are counsel of record (**Exhibit 6**);

¹ Respondents surmise that this is a thinly veiled attempt to add weight to their argument in the Court below, that Judge Early should have recused himself because Mr. Infinger spent the night at his lake house 30 years ago, and because Judge Early officiated at the wedding of Mrs. Rosen.

² Sporadically, since January, 2009, Appellants have sometimes served one, two, or all three of Mr. Infinger, Mrs. Rosen, and Mr. Belcher (**Exhibit 7**).

- And, even though Mr. Infinger's, Mrs. Rosen's, and Mr. Belcher's names have appeared on some pleadings, none have ever signed a pleading.

Nonetheless, Respondents, Mr. Infinger, Mrs. Rosen, and Mr. Belcher respectfully move the Court pursuant to Rule 264(b), SCACR, for an Order permitting the withdrawal of and removing Mr. Infinger, Mrs. Rosen, and Mr. Belcher as counsel of record, if so they be. In support of this Motion, Respondents show the Court that, if and to the extent Mr. Infinger, Mrs. Rosen and Mr. Belcher have ever been counsel of record in this matter, Respondents have been notified in writing that Mr. Infinger, Mrs. Rosen and Mr. Belcher seek to withdraw as counsel, and Respondents have authorized their attorneys in this matter, Mr. Johnston and Mr. Vick, to inform the Court that Respondents consent to the requested withdrawal. To be clear, Mr. Johnston and Mr. Vick are, and shall remain, Respondents' counsel of record in this matter.

(Signatures on Next Page)

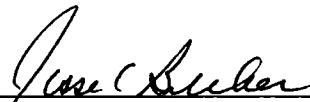
Respectfully Submitted,

HAYNSWORTH SINKLER BOYD, P.A.



Ellis M. Johnston, II, SC Bar # 3065
Calvin T. Vick, Jr., SC Bar #68187
Post Office Box 2048
Greenville, South Carolina 29602
(864) 240-3200 (phone)
(864) 240-3336 (fax)
ejohnston@hsblawfirm.com
tvick@hsblawfirm.com

Attorneys for Respondents



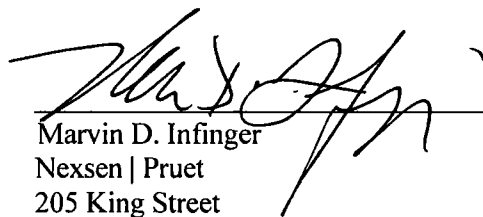
Jesse C. Belcher
Haynsworth Sinkler Boyd, P.A.
Post Office Box 2048
Greenville, South Carolina 29602
864-240-3200 (phone)
864-240-3336 (fax)

March 3, 2011
Greenville, South Carolina

(Signatures Continue on Next Page)



Anne Ross Rosen
Nexsen | Pruet
205 King Street
Suite 400
Charleston, South Carolina 29401
843-577-9440 (phone)
843-720-1777 (fax)



Marvin D. Infinger
Nexsen | Pruet
205 King Street
Suite 400
Charleston, South Carolina 29401
843-577-9440 (phone)
843-720-1777 (fax)

March 3, 2011
Charleston, South Carolina



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

POST OFFICE BOX 1437 • BEAUFORT, SOUTH CAROLINA 29901-1437

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

February 15, 2011

Haywood County, SC
FILED 2/16/11
11471.0010
PHONE: 843-525-6090
FAX: 843-525-6070
IDL

Honorable Tanya Gee, Clerk
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

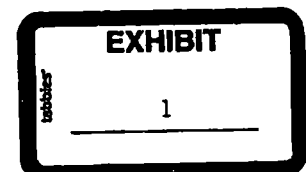
RE: Laurance H. Davis, Jr., et al. vs. Palmetto Apartments, et. al.
Case No. 2005-CP-07-1989
Case Tracking # 2010180087

Dear Ms. Gee:

I am in receipt of Calvin T. Vick's letter to you dated February 10, 2011, wherein Mr. Vick advises this Court that Marvin Infinger, Anne Ross Rosen and Jesse Belcher are not counsel of record for Respondents in the above-referenced appeal. Mr. Infinger, Ms. Rosen and Mr. Belcher were previously identified as counsel for the Defendants in the lower court. None of these attorneys have filed a motion to be relieved as counsel, nor has any order been issued relieving them.

Rule 11(b), SCRCF, provides that attorneys may be relieved in the lower court "by order of the Court, and not otherwise." Rule 235(a), SCACR, provides that "the attorneys ... of the respective parties of the court below shall be deemed the attorneys ... in the appellate court until withdrawal is approved and notice is given as provided in this Rule." Rule 235(b), SCACR, prohibits an attorney of record from withdrawing from representation of a client in an appeal "without justifiable cause, or the consent of his client; and then only after proper written notice to his client, on petition to and by written order of the appellate court, and with notice to the adverse party."

Rule 5, SCRCF, requires service of documents on all counsel of record. Accordingly, Mr. Pendarvis and I have provided these attorneys with copies of all communications in the lower court and concerning this appeal, as we have never received a written order relieving them as counsel in this Court or in the lower court. In light of the existing law, we must continue to treat these attorneys as counsel of record unless notified to do otherwise by this Court.

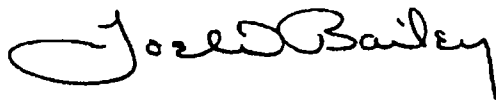


Honorable Tanya Gee, Clerk
February 15, 2011
Page Two

With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.

A handwritten signature in black ink that reads "Joel D. Bailey". The signature is fluid and cursive, with the first name "Joel" and last name "Bailey" clearly legible.

Joel D. Bailey

JDB/shb

cc: Ellis M. Johnston, II, Esquire
Calvin T. Vick, Jr., Esquire
Jesse C. Belcher, Jr., Esquire
Anne Ross Rosen, Esquire
Marvin D. Infinger, Esquire
Thomas A. Pendarvis, Esquire

BAILEY LAW FIRM, P.A.

Johnston, Ellis

From: baileylawfirm@charter.net
Sent: Friday, January 30, 2009 1:19 PM
To: Vick, Ted
Cc: Johnston, Ellis; Thomas Pendarvis; dearlylc: sccourts.org
Subject: Hearing before Judge Early

Ted:

Thomas has forwarded me a copy of the messages below which have transpired between you and Judge Early's law clerk. I note that I was not copied on your latest emails. Please see that all future correspondence and attachments are directed to both Thomas and myself. I am also requesting that Carra include me in all future correspondence.

I have not copied Jesse, Marvin or Anne on this email, in light of your and Ellis' statements yesterday that they are not working on the case.

Thanks.

Joel
The Bailey Law Firm, P.A.
PO Box 1437
Beaufort, SC 29901-1437
843-525-6090
843-525-6070 (fax)
baileylawfirm@charter.net

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

From: Vick, Ted
Sent: Thursday, January 29, 2009 1:30 PM
To: Early, Doyet A. Law Clerk (Carra Henderson); Thomas A. Pendarvis

Carra,

We are attaching the consent order for Judge Early's consideration and signature.

As for the motions hearing, I have spoken with Thomas Pendarvis and we would like to do this the afternoon of Feb. 10 in Bamberg. Thomas thinks it may take more than an hour (he is probably right), so we'll revise our estimate to 1 1/2 hours. Then we would probably want a brief and informal discussion with Judge Early after the motions hearing. If possible, we would like to start around 3:00 so that we can complete a deposition in Beaufort that morning. We are all going to be in Beaufort for depositions in these cases for most or all of that week. The motions for hearing are 2 motions to alter/amend by Plaintiffs, 1 motion for protective order by Defendants, and follow up on some previous discovery motions that Judge Early told us to work out the best we can and report back to him.

Thanks.

Ted Vick
Haynsworth Sinkler Boyd, P.A.
75 Beattie Place, Eleventh Floor (29601)
P.O. Box 2048 (29602-2048)
Greenville, South Carolina
Telephone 864-240-3324
Facsimile 864-240-3336
tvick@hsblawfirm.com



From: Early, Doyet A. Law Clerk (Carra Henderson)
[dearlylc@sccourts.org]
Sent: Thursday, January 29, 2009 10:56 AM
To: Vick, Ted; Thomas A. Pendarvis
Subject: RE: Davis v. Aimco -- dates for hearing on Plaintiffs'
Rule 59 motions

Ted,

I will be on the look-out for the consent order.
As for the hearing on outstanding motions, does Tuesday, February 10th
in Bamberg work for both sides? I can do a morning or afternoon
hearing, whichever everyone would prefer. Thanks!

J. Carra Henderson
Law Clerk to the Honorable D.A. Early, III
The Circuit Court of the 2nd Judicial Circuit
PO Box 90
Bamberg, SC 29003
Telephone: 803.245.4004
Fax: 803.245.2983
dearlylc@sccourts.org

From: Vick, Ted [tvick@hsblawfirm.com]
Sent: Thursday, January 29, 2009 10:06 AM
To: Early, Doyet A. Law Clerk (Carra Henderson); Thomas A.
Pendarvis
Subject: RE: Davis v. Aimco -- dates for hearing on Plaintiffs'
Rule 59 motions

Carra,

The parties have agreed on a consent order to alter/amend Judge
Early's Dec. 30, 2008 Order that authorized Judge Clary to serve as
Special Master for in camera review of certain documents, so as to add
additional documents to be reviewed by Judge Clary as Special Master.
Thomas and I are actually in that in camera review with Judge Clary
today, and we will sign the consent order today and send it to your
attention via e-mail and mail for Judge Early's consideration.

Also, the parties would like to set a hearing with Judge Early
on additional outstanding motions. Does Judge Early have any time
available the week of Feb. 9? If so, where will he be that week? I
have not discussed the length of the hearing with Plaintiffs' counsel
yet, but I think we would need about 1 hour, and perhaps some "in

chambers" discussion time with Judge Early if that can be done. Thank you.

Ted Vick
Haynsworth Sinkler Boyd, P.A.
75 Beattie Place, Eleventh Floor (29601)
P.O. Box 2048 (29602-2048)
Greenville, South Carolina
Telephone 864-240-3324
Facsimile 864-240-3336
tvick@hsblawfirm.com

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Roosevelt Gardens, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Orangeburg County

CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)

-vs-)

Orleans Gardens, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Charleston County

CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Palmetto Apartments, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Beaufort County

C/A #2005-CP-07-1989

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Parkview Apartments, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Beaufort County

C/A # 03-CP-07-726

CERTIFICATE OF MAILING

I, Sandra H. Bailey, of THE BAILEY LAW FIRM, P.A., attorneys for the Plaintiffs herein, do hereby certify that on the 13th day of March, 2009, I mailed a copy of the Plaintiffs' Motion to Alter or Amend Order Da March 3, 2009, the same being addressed to:

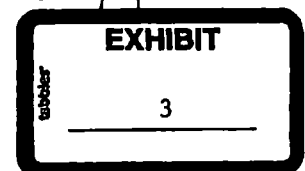
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

Calvin T. Vick, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

THE BAILEY LAW FIRM, P.A.
P.O. Box 1437
Beaufort, South Carolina 29901-1437
843-525-6090

By: Sandra H. Bailey
Sandra H. Bailey

Beaufort, South Carolina
March 13, 2009



STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
Laurance H. Davis, Jr., <i>et al</i> , Plaintiffs,	)	
-vs-	)	Orangeburg County
Roosevelt Gardens, a South Carolina	)	CA # 2005-CP-38-1131
Limited Partnership, <i>et al</i> , Defendants.	)	
 Rhoda G. Rentz, <i>et al</i> , Plaintiffs,	)	
-vs-	)	Charleston County
Orleans Gardens, a South Carolina	)	CA # 2005-CP-10-4229
Limited Partnership, <i>et al</i> , Defendants.	)	
 Laurance H. Davis, Jr., <i>et al</i> , Plaintiffs,	)	
-vs-	)	Beaufort County
Palmetto Apartments, a South Carolina	)	C/A #2005-CP-07-1989
Limited Partnership, <i>et al</i> , Defendants.	)	
 Laurance H. Davis, Jr., <i>et al</i> , Plaintiffs,	)	
-vs-	)	Beaufort County
Markview Apartments, a South Carolina	)	C/A # 03-CP-07-726
Limited Partnership, <i>et al</i> , Defendants.	)	

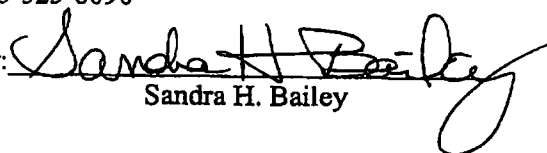
CERTIFICATE OF MAILING

I, Sandra H. Bailey, of THE BAILEY LAW FIRM, P.A., attorneys for the Plaintiffs herein, do hereby certify that on the 23rd day of March, 2009, I mailed a copy of the Plaintiffs' Motion to Alter or Amend Order Dated March 23, 2009, first class mail, postage pre-paid, the same being addressed to:

His M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

Calvin T. Vick, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

THE BAILEY LAW FIRM, P.A.
P.O. Box 1437
Beaufort, South Carolina 29901-1437
843-525-6090

By: 
Sandra H. Bailey

Beaufort, South Carolina
March 23, 2009

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF BEAUFORT	)	C/A # 03-CP-07-726
	)	
Laurance H. Davis, Jr., <i>et al</i> , Plaintiffs,	)	
-vs-	)	Beaufort County
Parkview Apartments, a South Carolina	)	
Limited Partnership, <i>et al</i> , Defendants.	)	
	)	

CERTIFICATE OF MAILING

I, Joel D. Bailey, of **THE BAILEY LAW FIRM, P.A.**, co-counsel for the Plaintiffs herein, do hereby certify that on the 25th day of January, 2010, I mailed a copy of the Plaintiffs' Third Supplemental Discovery Responses, *via* first class mail, postage pre-paid, the same being addressed to:

Ellis M. Johnston, II, Esquire
 Haynsworth Sinkler Boyd, P.A.
 PO Box 2048
 Greenville, South Carolina 29602

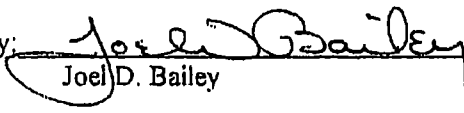
Calvin T. Vick, Esquire
 Haynsworth Sinkler Boyd, P.A.
 PO Box 2048
 Greenville, South Carolina 29602

Honorable Doyet A. Early, III
 Circuit Court Judge
 Post Office Box 90
 Bamberg, South Carolina 29003-0090

Thomas A. Pendarvis
PENDARVIS LAW OFFICES, P.C.
 500 Carteret St Ste A
 Beaufort SC 29902-5066

THE BAILEY LAW FIRM, P.A.
 P.O. Box 1437
 Beaufort, South Carolina 29901-1437
 843-525-6090

Beaufort, South Carolina
 January 25, 2010

By: 
 Joel D. Bailey



PENDARVIS LAW OFFICES, P.C.
500 CARTERET STREET, SUITE A
BEAUFORT, SOUTH CAROLINA 29902-5066

THOMAS A. PENDARVIS, J.D.
ADMITTED IN SC AND GA

THOMAS@PENDARVISLAW.COM

TEL. 843.524.9500
FAX. 843.524.9501

January 18, 2010

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr. J.D.
HAYNSWORTH SINKLER BOYD, P.A.
P.O. Box 2048
Greenville SC 29602

Re: Laurence H. Davis, Jr., et al. v. Parkview Apartments, et al.
Laurence H. Davis, Jr., et al. v. Palmetto Apartments, et al.
Carolina Management Corp. of Beaufort, et al. v. Pinewood Park Apts., et al.
Rhoda G. Rentz, et al. v. Orleans Gardens, et al.
Laurence H. Davis, Jr., et al. v. Roosevelt Gardens, et al.

Dear Ellis and Ted:

Enclosed please find clocked copies of the CONSENT ORDER GRANTING DEFENDANTS' MOTION FOR CONTINUANCE, which have been filed in the offices of the Clerks of Court for Beaufort, Charleston and Orangeburg counties.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

Thomas A. Pendarvis, J.D.

TAP/jac
Enclosures
cc: Joel D. Bailey, J.D. (w/enclosures)

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.
Parkview Apartments, a South Carolina Limited
Partnership, *et al.*, Defendants.

Beaufort County
C.A. No. 2003-CP-07-726

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.
Roosevelt Gardens, a South Carolina Limited
Partnership, *et al.*, Defendants.

Orangeburg County
C.A. No. 2005-CP-38-1131

Rhonda G. Rentz, *et al.*, Plaintiffs,
v.
Orleans Gardens, a South Carolina Limited
Partnership, *et al.*, Defendants.

Charleston County
C.A. No. 2005-CP-10-4229

Laurance H. Davis, Jr., *et al.*, Plaintiffs,
v.
Palmetto Apartments, a South Carolina Limited
Partnership, *et al.*, Defendants.

Beaufort County
C.A. No. 2005-CP-07-1989

Carolina Management Corporation of Beaufort,
et al., Plaintiffs,
v.
Pinewood Park Apartments, a South Carolina
Limited Partnership, *et al.*, Defendants.

Beaufort County
C.A. No. 2005-CP-07-1592

FILED FOR RECORD
JAN 15 P 12:27
CLERK OF COURT
ORANGEBURG, SC

**CONSENT ORDER GRANTING
DEFENDANTS' MOTION FOR CONTINUANCE**

This matter comes before the Court on the Defendants' motion for continuance of the above-captioned actions from the trial term of January 19, 2010. The Plaintiffs consent to the Defendants' motion for continuance, as indicated by the signature of the Plaintiffs' counsel below.

ATTEST:

Vinny B. Clark

WHEREFORE, the motion is granted and the above-captioned actions are continued

COURT
SOUTH CAROLINA

[Handwritten signature]

from the trial term of January 19, 2010.

IT IS SO ORDERED

This 4th day of Jan, 2010.
Chen, South Carolina

Doyet A. Early, III
Doyet A. Early, III, Circuit Court Judge

WE CONSENT:

Ellis M. Johnston, II
Ellis M. Johnston, II, SC Bar # 3065
Calvin T. Vick, Jr., SC Bar #68187
HAYNSWORTH SINKLER BOYD, PA
Post Office Box 2048
Greenville, South Carolina 29602
(864) 240-3217

Attorneys for Defendants

Joel D. Bailey
Joel D. Bailey
BAILEY LAW FIRM
Post Office Box 1437
Beaufort, South Carolina 29901-1437
(843) 525-6090

Thomas A. Pendarvis, SC Bar # 064918
PENDARVIS LAW OFFICE, P.C.
500 Carteret Street, Suite A
Beaufort, South Carolina 29902-5006
(843) 524-9500

Attorneys for Plaintiffs



PENDARVIS LAW OFFICES, P.C.
500 CARTERET STREET, SUITE A
BEAUFORT, SOUTH CAROLINA 29902-5066

THOMAS A. PENDARVIS, J.D.
ADMITTED IN SC AND GA

THOMAS@PENDARVISLAW.COM

TEL. 843.524.9500
FAX. 843.524.9501

February 10, 2010

Dear Judge Early, Ellis and Ted:

Re: Order of Protection for Thomas A. Pendarvis

Enclosed please find an Order of Protection which has been filed with the Orangeburg County Clerk of Court covering the time period of **July 23, 2010 through and including August 6, 2010**. The following is a list of pending cases in which I am involved:

1. CIVIL ACTION	Laurance H. Davis, <i>et al</i> v Roosevelt Gardens, <i>et al</i>
CASE NO.	2005-CP-38-1131
OPPOSING COUNSEL	Ellis M. Johnston, II, JD Calvin T. Vick, Jr., JD Jesse C. Belcher, Jr., JD

Should you have any questions, please do not hesitate to contact me.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

Thomas A. Pendarvis, J.D.

TAP\jac
Enclosure

cc: The Honorable Doyet A. Early, III
Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.

FILED
2/16/10
11471.0010
CTV, EMJ, HGC, SL, MLS



PENDARVIS LAW OFFICES, P.C.
500 CARTERET STREET, SUITE A
BEAUFORT, SOUTH CAROLINA 29902-5066

THOMAS A. PENDARVIS, J.D.
ADMITTED IN SC AND GA

THOMAS@PENDARVISLAW.COM

TEL. 843.524.9500
FAX. 843.524.9501

February 10, 2010

Dear Judge Early, Ellis and Ted:

Re: Order of Protection for Thomas A. Pendarvis

Enclosed please find an Order of Protection which has been filed with the Orangeburg County Clerk of Court covering the time period of **July 23, 2010 through and including August 6, 2010**. The following is a list of pending cases in which I am involved:

1. CIVIL ACTION	Laurance H. Davis, <i>et al</i> v Roosevelt Gardens, <i>et al</i>
CASE NO.	2005-CP-38-1131
OPPOSING COUNSEL	Ellis M. Johnston, II, JD Calvin T. Vick, Jr., JD Jesse C. Belcher, Jr., JD

Should you have any questions, please do not hesitate to contact me.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

Thomas A. Pendarvis, J.D.

TAP\jac
Enclosure

cc: The Honorable Doyet A. Early, III
Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.

FILED
2/16/10
11471.0010
CTV, EMJ, HGC, SL, MLS

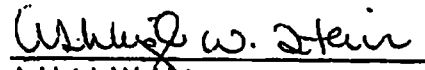
The undersigned hereby certifies she also served the Beaufort, Charleston, and Orangburg
County Clerk of Court with a copy of the Notice of Appeal by mailing a copy of the same by
United States Mail with first class postage prepaid to the following addresses:

The Honorable Jerri Roseneau
Beaufort County Clerk of Court
Post Office Drawer 1128
Beaufort, South Carolina 29901

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad Street, #106
Charleston, South Carolina 29401

The Honorable Lisa W. Mizell
Orangeburg County Clerk of Court
Post Office Drawer 9000
Orangeburg, South Carolina 29116

September 10, 2009
Columbia, South Carolina


Ashleigh W. Fair

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort, Charleston, and Orangeburg Counties

Doyet A. Early, III, Circuit Court Judge

Beaufort County 03-CP-07-726
Beaufort County 05-CP-07-1989
Beaufort County 05-CP-07-1990
Charleston County 05-CP-10-4229
Orangeburg County 05-CP-38-1131

Laurance H. Davis, Jr., Mary Jane R. Pike,
Eva Marie Reynolds, and Rhonda G. Rentz,
individually and in their capacities as the
Limited Partners of Parkview Apartments,
a South Carolina Limited Partnership Appellants,

v.

Parkview Apartments, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Laurance H. Davis, Jr., Marvin D. McCarthy,
James W. Ivey, and Erin E. Ivey, individually
and in their capacities as the Limited
Partners of Palmetto Apartments,
a South Carolina Limited Partnership Appellants,

v.

Palmetto Apartments, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Carolina Management Corporation of
Beaufort, James B. Jackson,
Whaley R. Hinnant, Jr., Mary Gasser
Rawl, and Rhonda G. Rentz, individually
and in their capacities as the Limited
Partners of Pinewood Park Apartments,
a South Carolina Limited Partnership Appellants,

v.

Pinewood Park Apartments, a South
Carolina Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Rhonda G. Rentz, Mary Jane Pike,
Eva Marie Reynolds, and Joanne O. Mercy,
individually and in their capacities as the
Limited Partners of Orleans Gardens, a
South Carolina Limited Partnership Appellants,

v.

Orleans Gardens, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Laurance H. Davis, Jr., Rhonda G. Rentz,
Mortimer M. Weinberg, Jr., Hodge Land Co.,
Inc., and Anna Trotter, individually and in their
capacities as the Limited Partners of Roosevelt
Gardens, a South Carolina Limited Partnership Appellants,

v.

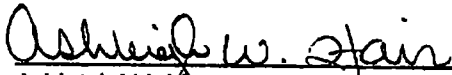
Roosevelt Gardens, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, she served counsel for the Respondents, with a copy of the Amended Notice of Appeal by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

C. Theodore Vick, Jr., Esquire
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
Post Office Box 2048
Greenville, South Carolina 29602-2048

September 24, 2009
Columbia, South Carolina


Ashleigh W. Hair

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort, Charleston, and Orangeburg Counties

Doyet A. Early, III, Circuit Court Judge

Beaufort County 03-CP-07-726
Beaufort County 05-CP-07-1989
Beaufort County 05-CP-07-1990
Charleston County 05-CP-10-4229
Orangeburg County 05-CP-38-1131

Laurance H. Davis, Jr., Mary Jane R. Pike,
Eva Marie Reynolds, and Rhonda G. Rentz,
individually and in their capacities as the
Limited Partners of Parkview Apartments,
a South Carolina Limited Partnership Appellants,

v.

Parkview Apartments, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Laurance H. Davis, Jr., Marvin D. McCarthy,
James W. Ivey, and Erin E. Ivey, individually
and in their capacities as the Limited
Partners of Palmetto Apartments,
a South Carolina Limited Partnership Appellants,

v.

Palmetto Apartments, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Carolina Management Corporation of
Beaufort, James B. Jackson,
Whaley R. Hinnant, Jr., Mary Gasser
Rawl, and Rhonda G. Rentz, individually
and in their capacities as the Limited
Partners of Pinewood Park Apartments,
a South Carolina Limited Partnership Appellants,

v.

Pinewood Park Apartments, a South
Carolina Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Rhonda G. Rentz, Mary Jane Pike,
Eva Marie Reynolds, and Joanne O. Mercy,
individually and in their capacities as the
Limited Partners of Orleans Gardens, a
South Carolina Limited Partnership Appellants,

v.

Orleans Gardens, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents,

and

Laurance H. Davis, Jr., Rhonda G. Rentz,
Mortimer M. Weinberg, Jr., Hodge Land Co.,
Inc., and Anna Trotter, individually and in their
capacities as the Limited Partners of Roosevelt
Gardens, a South Carolina Limited Partnership Appellants,

v.

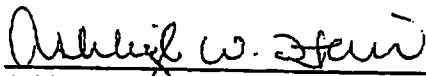
Roosevelt Gardens, a South Carolina
Limited Partnership, Apartment Investment
and Management Company a/k/a AIMCO;
Insignia Financial Group, Inc.; Amreal Corporation
a/k/a/ and f/k/a USS Corporation a/k/a/ and
f/k/a/ U.S. Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a generic
designation for a party or parties whose true
identity is unknown Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, she served counsel for the Respondents, with a copy of the Appellants' Return in Opposition to Respondents' Motion to Dismiss and Appellants' Reply in Support of their Motion to Hold Appeal in Abeyance by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

C. Theodore Vick, Jr., Esquire
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
Post Office Box 2048
Greenville, South Carolina 29602-2048

September 28, 2009
Columbia, South Carolina


Ashleigh W. Blair

THE STATE OF SOUTH CAROLINA
In the Supreme Court

ORIGINAL JURISDICTION

Ex Parte:

Laurance H. Davis, Jr., et al., ... Petitioners,

In Re:

Laurance H. Davis, Jr., et al., ... Plaintiffs,

v.

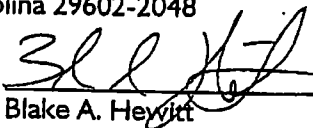
Parkview Apartments,
et al., ... Defendants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, he served counsel for the Defendants, with a copy of the Petition for the Writ of Prohibition or Alternatively for Writ of Certiorari by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

C. Theodore Vick, Jr., Esquire
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
Post Office Box 2048
Greenville, South Carolina 29602-2048

September 2, 2009
Columbia, South Carolina


Blake A. Heyvitt

EXHIBIT

5

THE STATE OF SOUTH CAROLINA
In the Supreme Court

ORIGINAL JURISDICTION

Ex Parte:

Laurance H. Davis, Jr., et al., ... Petitioners,

In Re:

Laurance H. Davis, Jr., et al., ... Plaintiffs,

v.

Parkview Apartments,
et al., ... Defendants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, she served counsel for the Defendants, with a copy of the Reply in Support of Petition for the Writ of Prohibition or Alternatively for Writ of Certiorari by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

C. Theodore Vick, Jr., Esquire
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
Post Office Box 2048
Greenville, South Carolina 29602-2048

September 21, 2009
Columbia, South Carolina


Ashleigh W. Blair



Beaufort County Fourteenth Circuit Public Index

[Back](#)[New Search](#)[County Home Page](#)

Laurance H Davis Jr , plaintiff, et al VS Palmetto Apartments A Sc Limit , defendant, et al

Case Number: 2005CP0701989

Case Type: Common Pleas

Status: Appeal

Disposition: Ended by Non Jury

Original Source Doc:

Judgment Number:

Court Agency: Beaufort County Common Pleas

Case Sub Type: Special-Comp/Oth 699

Assigned Judge: Early, Doyet A. III

Disposition Date 04/09/2010

Original Case #:

Filed Date: 10/13/2005

File Type: Jury

Disposition Judge: Early, Doyet A. III

[Parties](#) | [Judgments](#) | [Actions](#) | [Associated Cases](#) | [Tax Map Information](#)

Parties

Name	Address	Race	Sex	Date of Birth	Party Type Description	Status
AIMCO,		Unknown			Defendant	Active
Amreal Corporation,		Unknown			Defendant	Active
Apartment Investment And Manag,		Unknown U			Defendant	Active
Bailey, Joel D	The Bailey Law Firm, Pa Post Office Box 1437 Beaufort SC 299011437				Plaintiff Attorney	Active
Davis, Laurance H Jr		Unknown U			Plaintiff	Active
Doe, John		Unknown U			Defendant	Active
Insignia Financial Group Inc,		Unknown U			Defendant	Active
Istc Corporation,		Unknown U			Defendant	Active
Ivey, Erin E		Unknown U			Plaintiff	Active
Ivey, James W		Unknown U			Plaintiff	Active
Johnston, Ellis M II	Haynsworth Sinkler Boyd, PA P.O. Box 2048 Greenville SC 29602				Defendant Attorney	Active



Mccarthy, Marvin D		Unknown U	Plaintiff	Active
Palmetto Apartment A Sc Limite,		Unknown U	Plaintiff	Active
Palmetto Apartments A Sc Limit,		Unknown U	Defendant	Active
Pendarvis, Thomas A.	Pendarvis Law Offices, PC 500 Carteret St. Ste. A Beaufort SC 29902		Plaintiff Attorney	Active
Tuck, N Barton Jr		Unknown U	Defendant	Active
Us Shelter Corporation,		Unknown U	Defendant	Active
Uss Corporation,		Unknown	Defendant	Active
Vick, Calvin T Jr.	Haynsworth Slnkler Boyd, PA P.O. Box 2048 Greenville SC 29602		Defendant Attorney	Active

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2003-CP-07-726

Laurance H. Davis, Jr.; et al.;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and
f/k/a USS Corporation a/k/a and f/k/a
U.S. Shelter Corporation; ISTC
Corporation; N. Barton Tuck, Jr.; and
John Doe, a generic designation for a
party or parties whose true identity is
unknown,

Defendants.

CONSOLIDATED CASES:

2005-CP-07-1990 (Beaufort) (**Pinewood**)
2005-CP-07-1989 (Beaufort) (**Palmetto**)
2005-CP-10-4229 (Charleston) (**Orleans**)
2005-CP-38-1131 (Orangeburg) (**Roosevelt**)

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

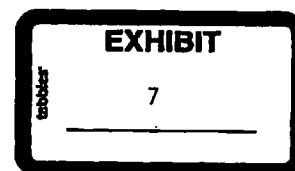
DOCUMENTS SERVED

1. PLAINTIFFS' SUPPLEMENTAL RESPONSES TO DEFENDANTS' DISCOVERY REQUESTS TO ALL PLAINTIFFS DATED AUGUST 23, 2008.

COUNSEL SERVED

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, P.A.
P.O. Box 2048
Greenville SC 29602

Marvin D. Infinger, J.D.
Anne Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
134 Meeting Street, 3rd Floor
Charleston SC 29401



Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
January 26, 2009

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2003-CP-07-726

Laurance H. Davis, Jr.; et al.;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and
f/k/a USS Corporation a/k/a and f/k/a
U.S. Shelter Corporation; ISTC
Corporation; N. Barton Tuck, Jr.; and
John Doe, a generic designation for a
party or parties whose true identity is
unknown,

Defendants.

CONSOLIDATED CASES:

2005-CP-07-1990 (Beaufort) (**Pinewood**)
2005-CP-07-1989 (Beaufort) (**Palmetto**)
2005-CP-10-4229 (Charleston) (**Orleans**)
2005-CP-38-1131 (Orangeburg) (**Roosevelt**)

CERTIFICATE OF SERVICE

I, Pamela D. Higgins, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

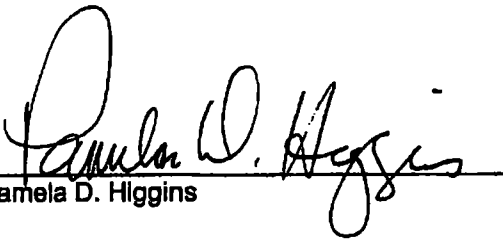
DOCUMENTS SERVED

1. PLAINTIFFS' DISCOVERY REQUESTS (DATED FEBRUARY 3, 2009).

COUNSEL SERVED

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, P.A.
P.O. Box 2048
Greenville SC 29602

Marvin D. Infinger, J.D.
Anne Ross Rosen, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
134 Meeting Street, 3rd Floor
Charleston SC 29401


Pamela D. Higgins

Beaufort, South Carolina
February 3, 2009

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Parkview Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2003-CP-07-726
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Roosevelt Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Orangeburg County
) C.A. No. 2005-CP-38-1131
)

Rhonda G. Rentz, et al., Plaintiffs,
v.
Orleans Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Charleston County
) C.A. No. 2005-CP-10-4229
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Palmetto Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2005-CP-07-1989
)

Carolina Management Corporation of
Beaufort, et al., Plaintiffs,
v.
Pinewood Park Apartments, a South
Carolina Limited Partnership, et al.,
Defendants.

)
)
) Beaufort County
) C.A. No. 2005-CP-07-1990
)
)

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Documents Served

MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER GRANTING DEFENDANTS' MOTION TO COMPEL, DATED NOVEMBER 6, 2008

Counsel Served

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston SC 29401

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina

March 13, 2009

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Parkview Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2003-CP-07-726
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Roosevelt Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Orangeburg County
) C.A. No. 2005-CP-38-1131
)

Rhonda G. Rentz, et al., Plaintiffs,
v.
Orleans Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Charleston County
) C.A. No. 2005-CP-10-4229
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Palmetto Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2005-CP-07-1989
)

Carolina Management Corporation of
Beaufort, et al., Plaintiffs,
v.
Pinewood Park Apartments, a South
Carolina Limited Partnership, et al.,
Defendants.

)
)
) Beaufort County
) C.A. No. 2005-CP-07-1990
)
)

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

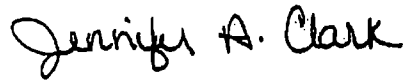
Documents Served

MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION TO ALTER OR AMEND ORDER ADOPTING FINDINGS AND CONCLUSIONS OF SPECIAL MASTER CLARY, DATED JUNE 2, 2009

Counsel Served

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston SC 29401



Jennifer A. Clark

Beaufort, South Carolina

June 11, 2009

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Parkview Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2003-CP-07-726
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Roosevelt Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Orangeburg County
) C.A. No. 2005-CP-38-1131
)

Rhonda G. Rentz, et al., Plaintiffs,
v.
Orleans Gardens, a South Carolina
Limited Partnership, et al., Defendants.

)
) Charleston County
) C.A. No. 2005-CP-10-4229
)

Laurance H. Davis, Jr., et al., Plaintiffs,
v.
Palmetto Apartments, a South Carolina
Limited Partnership, et al., Defendants.

)
) Beaufort County
) C.A. No. 2005-CP-07-1989
)

Carolina Management Corporation of
Beaufort, et al., Plaintiffs,
v.
Pinewood Park Apartments, a South
Carolina Limited Partnership, et al.,
Defendants.

)
)
) Beaufort County
) C.A. No. 2005-CP-07-1990
)
)

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by e-mail and mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Documents Served

PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION TO ALTER OR AMEND ORDER
ADOPTING FINDINGS AND CONCLUSIONS OF SPECIAL MASTER CLARY, DATED JUNE 2, 2009

Counsel Served

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville SC 29602

Marvin D. Infinger, JD
Anne Ross Rosen, JD
HAYNSWORTH SINKLER BOYD, PA
134 Meeting Street, 3rd Floor
Charleston SC 29401

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina

July 2, 2009

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., et al., Plaintiffs,	)	
v.	)	Beaufort County
Parkview Apartments, a South Carolina	)	C.A. No. 2003-CP-07-726
Limited Partnership, et al., Defendants.	)	
Laurance H. Davis, Jr., et al., Plaintiffs,	)	
v.	)	Orangeburg County
Roosevelt Gardens, a South Carolina	)	C.A. No. 2005-CP-38-1131
Limited Partnership, et al., Defendants.	)	
Rhonda G. Rentz, et al., Plaintiffs,	)	
v.	)	Charleston County
Orleans Gardens, a South Carolina	)	C.A. No. 2005-CP-10-4229
Limited Partnership, et al., Defendants.	)	
Laurance H. Davis, Jr., et al., Plaintiffs,	)	
v.	)	Beaufort County
Palmetto Apartments, a South Carolina	)	C.A. No. 2005-CP-07-1989
Limited Partnership, et al., Defendants.	)	
Carolina Management Corporation of	)	
Beaufort, et al., Plaintiffs,	)	
v.	)	Beaufort County
Pinewood Park Apartments, a South	)	C.A. No. 2005-CP-07-1990
Carolina Limited Partnership, et al.,	)	
Defendants.	)	

CERTIFICATE OF SERVICE

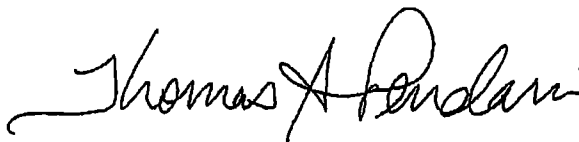
I, Thomas A. Pendarvis, counsel for Plaintiffs in the above-referenced matters, hereby certify that I have served the documents listed below upon all counsel of record by hand-delivery on August 24, 2009:

Documents Served

PLAINTIFFS' SECOND SUPPLEMENTAL RESPONSES TO DEFENDANTS' DISCOVERY REQUESTS TO ALL PLAINTIFFS DATED AUGUST 28, 2008.

Counsel Served

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville SC 29602

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with a large initial "T" and "P".

Thomas A. Pendarvis, J.D.

Beaufort, South Carolina

August 24, 2009

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1989

Lawrence H. Davis, Jr.; Marvin D. McCarthy; James W. Ivey; and Erin E. Ivey, individually and in their capacities as the Limited Partners of Palmetto Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

CERTIFICATE OF SERVICE

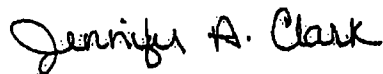
Palmetto Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION FOR RELIEF FROM JULY 28, 2009 ORDER AMENDING COURT'S ORDER DATED JUNE 2, 2009



Jennifer A. Clark

Beaufort, South Carolina
January 28, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2003-CP-07-0726

Laurance H. Davis, Jr.; Mary Jane R. Pike; Eva Marie Reynolds; and Rhoda G. Rentz, individually and in their capacities as the Limited Partners of Parkview Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. BartonTuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

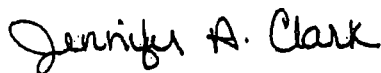
Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION FOR RELIEF FROM JULY 28, 2009 ORDER AMENDING COURT'S ORDER DATED JUNE 2, 2009



Jennifer A. Clark

Beaufort, South Carolina
January 28, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1990

Carolina Management Corporation of
Beaufort, James B. Jackson, Whaley R.
Hinnant, Jr., Mary Gasser Rawl and
Rhonda G. Rentz, individually and in
their capacities as the Limited Partners
of Pinewood Park Apartments, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Pinewood Park Apartments, a South
Carolina Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

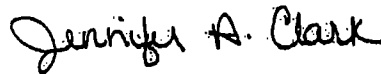
Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I
have served the documents listed below upon all counsel of record by mailing a copy of
same, postage prepaid and return address clearly indicated on said envelope, to said
counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION FOR
RELIEF FROM JULY 28, 2009 ORDER AMENDING COURT'S ORDER DATED JUNE 2, 2009



Jennifer A. Clark

Beaufort, South Carolina
January 28, 2010

STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NO. 2005-CP-38-1131

Laurance H. Davis, Jr., Rhona G. Rentz,
Mortimer M. Weinberg, Jr., Hodge Land
Co., Inc. And Anna Trotter, individually
and in their capacities as the Limited
Partners of Roosevelt Gardens, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Roosevelt Gardens, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

2010-1-18-20

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I
have served the documents listed below upon all counsel of record by mailing a copy of
same, postage prepaid and return address clearly indicated on said envelope, to said
counsel at the following address:

ATTEST: COPY

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Jennifer A. Clark
JENNIFER A. CLARK
COUNTY OF ORANGE
TY, SOUTH CAROLINA

Documents Served: MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION FOR
RELIEF FROM JULY 28, 2009 ORDER AMENDING COURT'S ORDER DATED JUNE 2, 2009

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
January 28, 2010

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-10-4229

Rhonda G. Rentz, Mary Jane Pike, Eva Marie Reynolds, and Joanne O. Mercy, individually and in their capacities as the Limited Partners of Orleans Gardens, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Orleans Gardens, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

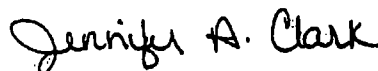
Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: MOTION INFORMATION COVER SHEET and PLAINTIFFS' MOTION FOR RELIEF FROM JULY 28, 2009 ORDER AMENDING COURT'S ORDER DATED JUNE 2, 2009



Jennifer A. Clark

Beaufort, South Carolina
January 28, 2010



PENDARVIS LAW OFFICES, P.C.
500 CARTERET STREET, SUITE A
BEAUFORT, SOUTH CAROLINA 29902-5066

THOMAS A. PENDARVIS, J.D.
ADMITTED IN SC AND GA

THOMAS@PENDARVISLAW.COM

TEL. 843.524.9500
FAX. 843.524.9501

February 10, 2010

TO WHOM IT MAY CONCERN:

Re: Order of Protection for Thomas A. Pendarvis

Enclosed please find an Order of Protection which has been filed with the Beaufort County Clerk of Court covering the time period of **July 23, 2010 through and including August 6, 2010.**

This correspondence is being sent to all counsel and pro se litigants involved in the attached referenced cases. Should you have any questions, please do not hesitate to contact me.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

Thomas A. Pendarvis, J.D.

TAP/jac
Enclosure

cc: The Honorable Doyet A. Early, III
Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Adolph D. Brown

Received by: Doyet A. Early, III
Date Recd: 2/16/10
Case # 11471-0010

Dispositional:
CTV, EMJ, HGC, SC, MU

Page 2
February 10, 2010

Drew A. Laughlin, JD
Glenn L. Capell, JD
Thomas E. Clarkson
Thomas & Judith Collentine
Weston Adams Law Firm
Kimberly D. Sutton, JD
Robert V. Mathison, Jr., JD
Denson H. Fraser, Jr., JD
James F. Berl, JD
Charles & Karen Gerba
William B. Harvey, III, JD
James Jack & Ernestine Wilson
John & Clare Jilnicki
Ward F. Borden, JD
Triece Ziblut, JD
Rogers Townsend & Thomas, PC
Seibels Law Firm, PA
Eric & Kelly Metzger
Charles Wiseman, JD
Michael F. Markowski
Ralph E. Tupper, JD
Michael Mogil, JD

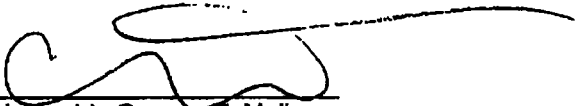
STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT) FOURTEENTH JUDICIAL CIRCUIT

ORDER OF PROTECTION FOR THOMAS A. PENDARVIS

This matter comes before me upon motion of Thomas A. Pendarvis seeking protection during the period **July 23, 2010 through and including August 6, 2010**, as such protection may relate to any pending cases in Beaufort County, including but not limited to the actions on the attachment hereto. It appearing that the grant of the requested protection is appropriate, and there being no objection from any counsel of record,

NOW, THEREFORE, IT IS ORDERED that Thomas A. Pendarvis is afforded protection during the period **July 23, 2010 through and including August 6, 2010** for these and all pending cases in Beaufort County, South Carolina; and,

IT IS SO ORDERED.


The Honorable Carmen T. Mullen
Administrative Judge
Fourteenth Judicial Circuit

Beaufort, SC

November 16, 2009

09 NOV 19 PM 4: 58
JENNIFER ROSENEAU
BEAUFORT COUNTY, S.C.
CLERK OF COURT



PENDARVIS LAW OFFICES, P.C.
500 CARTERET STREET, SUITE A
BEAUFORT, SOUTH CAROLINA 29902-5066

THOMAS A. PENDARVIS, J.D.
ADMITTED IN SC AND GA

THOMAS@PENDARVISLAW.COM

TEL. 843.524.9500
FAX. 843.524.9501

February 10, 2010

TO WHOM IT MAY CONCERN:

Re: Order of Protection for Thomas A. Pendarvis

Enclosed please find an ORDER OF PROTECTION which has been filed with the Charleston County Clerk of Court covering the time period of **July 23, 2010 through and including August 6, 2010**. The following is a list of pending cases in which I am involved:

- | | | |
|----|------------------|---|
| 1. | CIVIL ACTION | Berrien W. Smith v. J. Drayton Hastie, Jr., |
| | CASE NO. | 2000-CP-10-3029 |
| | OPPOSING COUNSEL | Richard Rosen, J.D. |
| | | Elizabeth Marlow, J.D. |
| 2. | CIVIL ACTION | Rivers Point Row Property Owners Association, |
| | | Inc. v John B. Hagerty, J.D., et al |
| | CASE NO. | 2008-CP-10-6740 |
| | OPPOSING COUNSEL | John A. Massalon, J.D. |
| 3. | CIVIL ACTION | Rhoda G. Rentz, et al v. Orleans Gardens, et al |
| | CASE NO. | 2005-CP-10-4229 |
| | OPPOSING COUNSEL | Ellis M. Johnston, II, JD |
| | | Calvin T. Vick, Jr., JD |
| | | Jesse C. Belcher, Jr., JD |

Should you have any questions, please do not hesitate to contact me.

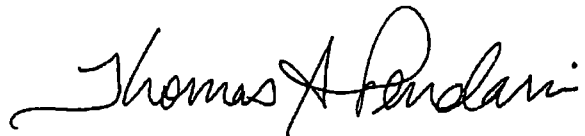
2/16/10
11471.001D
CTV, EHS, HGC, JCL, MLLS

Page 2
February 10, 2010

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, reading "Thomas A. Pendarvis". The signature is fluid and cursive, with the first name "Thomas" and last name "Pendarvis" clearly legible.

Thomas A. Pendarvis, J.D.

TAP\jac
Enclosure

cc: The Honorable Doyet A. Early, III
Richard Rosen, JD
Elizabeth Marlow, JD
John A. Massalon, JD
Berrien Smith
Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD

FILED

2009 NOV 16 PM 4:35

JULIE J. ARMSTRONG
CLERK OF COURT

BY

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PL
COUNTY OF CHARLESTON) NINTH JUDICIAL CIRCUIT

ORDER OF PROTECTION FOR THOMAS A. PENDARVIS

This matter comes before me upon motion of Thomas A. Pendarvis seeking protection during the period **July 23, 2010 through and including August 6, 2010**, as such protection may relate to any pending cases in Charleston County, including but not limited to the following actions:

1. CIVIL ACTION Berrien W. Smith v. J. Drayton Hastie, Jr.,
CASE NO. 2000-CP-10-3029
OPPOSING COUNSEL Richard Rosen, J.D.
Elizabeth Marlow, J.D.
2. CIVIL ACTION Rivers Point Row Property Owners
Association, Inc. v John B. Hagerty, J.D., et al
CASE NO. 2008-CP-10-6740
OPPOSING COUNSEL John A. Massalon, J.D.
3. CIVIL ACTION Rhoda G. Rentz, et al v. Orleans Gardens, et
al
CASE NO. 2005-CP-10-4229
OPPOSING COUNSEL Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD

It appearing that the grant of the requested protection is appropriate, and there being no objection from any counsel of record,

NOW, THEREFORE, IT IS ORDERED that Thomas A. Pendarvis is afforded protection during the period **July 23, 2010 through and including August 6, 2010** for these and all pending cases in Charleston County, South Carolina; and,

IT IS SO ORDERED.

Charleston *SLG*
Beaufort, SC
November 16, 2009

D.L. Jeff

The Honorable Deadra L. Jefferson
Administrative Judge
Ninth Judicial Circuit

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Parkview Apartments, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A # 03-CP-07-726

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Roosevelt Gardens, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Orangeburg County
CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)

-vs-)

Orleans Gardens, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Charleston County
CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Palmetto Apartments, a South Carolina)

Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A #2005-CP-07-1989

Carolina Management Corporation of)
Beaufort, *et al*, Plaintiffs,)

-vs-)

Pinewood Park Apartments, a South)

Carolina Limited Partnership, *et al*,)

Defendants.)

Beaufort County
C/A # 2005-CP-07-1990

CERTIFICATE OF MAILING

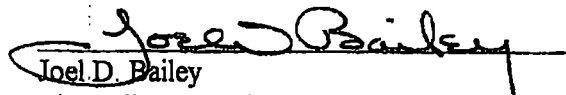
I hereby certify that I have served the Plaintiffs' Motion for Disclosure and Discovery and Motion for Protective Order, by depositing a copy in the United States Mail, postage prepaid, on February 22, 2010, addressed to the following attorneys of record:

Ellis M. Johnston, II
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Calvin T. Vick
PO Box 2048
Greenville, SC 29602

Anne Ross Rosen
134 Meeting Street, 3rd Floor
Charleston, SC 29401

A handwritten signature in black ink, appearing to read "Joel D. Bailey", written over a horizontal line.

Joel D. Bailey
The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort, South Carolina 29901-1437

February 22, 2010

STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NO. 2005-CP-38-1131

Laurance H. Davis, Jr., Rhoda G. Rentz,
Mortimer M. Weinberg, Jr., Hodge Land
Co., Inc. And Anna Trotter, individually
and in their capacities as the Limited
Partners of Roosevelt Gardens, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Roosevelt Gardens, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR DISCLOSURE & DISCOVERY

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
March 2, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1990

Carolina Management Corporation of
Beaufort, James B. Jackson, Whaley R.
Hinnant, Jr., Mary Gasser Rawl and
Rhoda G. Rentz, individually and in their
capacities as the Limited Partners of
Pinewood Park Apartments, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Pinewood Park Apartments, a South
Carolina Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

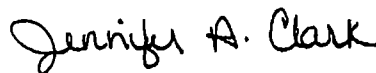
Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR DISCLOSURE & DISCOVERY



Jennifer A. Clark

Beaufort, South Carolina
March 2, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1989

Lawrence H. Davis, Jr.; Marvin D. McCarthy; James W. Ivey; and Erin E. Ivey, individually and in their capacities as the Limited Partners of Palmetto Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

CERTIFICATE OF SERVICE

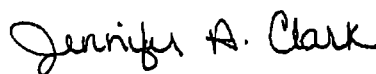
Palmetto Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR DISCLOSURE & DISCOVERY



Jennifer A. Clark

Beaufort, South Carolina
March 2, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2003-CP-07-0726

Laurance H. Davis, Jr.; Mary Jane R. Pike; Eva Marie Reynolds; and Rhoda G. Rentz, individually and in their capacities as the Limited Partners of Parkview Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. BartonTuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR DISCLOSURE & DISCOVERY

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
March 2, 2010

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-10-4229

Rhoda G. Rentz, Mary Jane Pike, Eva Marie Reynolds, and Joanne O. Mercy, individually and in their capacities as the Limited Partners of Orleans Gardens, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Orleans Gardens, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

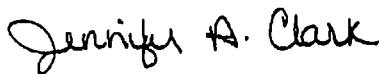
Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: PLAINTIFFS' REPLY MEMORANDUM IN SUPPORT OF MOTION FOR DISCLOSURE & DISCOVERY



Jennifer A. Clark

Beaufort, South Carolina
March 2, 2010



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

POST OFFICE BOX 1437 • BEAUFORT, SOUTH CAROLINA 29901-1437

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 843-525-6090
FAX: 843-525-6070

March 8, 2010

Fripp Island Golf & Beach Resort
201 Tarpon Boulevard
Fripp Island, SC 29920

RE: Laurance H. Davis, Jr., et al. vs. Parkview Apartments, et al.

Dear Sir or Madame:

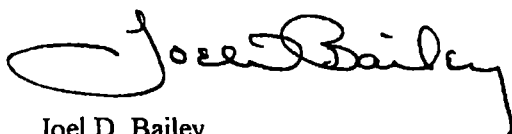
Enclosed herewith please find a subpoena requesting inspection and copying of certain documents. It will not be necessary for you to appear at my office on March 19th, provided the documents are produced to me prior to that time.

If you have any questions, please do not hesitate to contact me.

With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.



Joel D. Bailey

JDB/shb
enclosure

cc: Ellis M. Johnston, II, Esquire (w/enclosure)
Marvin D. Infinger, Esquire (w/enclosure)
Calvin T. Vick, Esquire (w/enclosure)
Anne Ross Rosen, Esquire (w/enclosure)
Thomas A. Pendarvis, Esquire (w/enclosure)

Haynsworth Sinkler Boyd, P.A.

Date Recd 3/12/10

C/M # 11471.0010

Docketed CTV, EMJ, HGC, SL, MJS

IDL CTV, EMJ, HGC, SL, MJS

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

COUNTY OF BEAUFORT)

C/A # 03-CP-07-726

Laurance H. Davis, Jr., *et al*, Plaintiffs,)

-vs-)

Beaufort County

Parkview Apartments, a South Carolina)

Limited Partnership, *et al*, Defendants.)

CERTIFICATE OF MAILING

I, Joel D. Bailey, of **THE BAILEY LAW FIRM, P.A.**, co-counsel for the Plaintiffs herein, do hereby certify that on the 18th day of March, 2010, I mailed a copy of the Plaintiffs' Fourth Supplemental Discovery Responses, *via* first class mail, postage pre-paid, the same being addressed to:

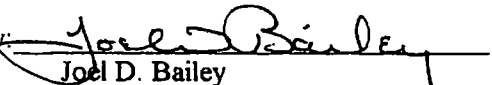
Ellis M. Johnston, II, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

Calvin T. Vick, Esquire
Haynsworth Sinkler Boyd, P.A.
PO Box 2048
Greenville, South Carolina 29602

Marvin D. Infinger, Esquire
Haynsworth Sinkler Boyd, P.A.
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Anne Ross Rosen, Esquire
Haynsworth Sinkler Boyd, P.A.
134 Meeting Street, 3rd Floor
Charleston, SC 29401

THE BAILEY LAW FIRM, P.A.
P.O. Box 1437
Beaufort, South Carolina 29901-1437
843-525-6090

By: 

Joel D. Bailey

Beaufort, South Carolina
March 18, 2010

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Parkview Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A # 03-CP-07-726

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Roosevelt Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Orangeburg County
CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)
-vs-)
Orleans Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Charleston County
CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Palmetto Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A #2005-CP-07-1989

Carolina Management Corporation of)
Beaufort, *et al*, Plaintiffs,)
-vs-)
Pinewood Park Apartments, a South)
Carolina Limited Partnership, *et al*,)
Defendants.)

Beaufort County
C/A # 2005-CP-07-1990

CERTIFICATE OF MAILING

I hereby certify that I have served the Plaintiffs' Motions for Recusal and for Vacation of Prior Orders, by depositing a copy of the motions being filed in each of the above-captioned cases, in the United States Mail, postage prepaid, on March 31ST, 2010, addressed to the following:

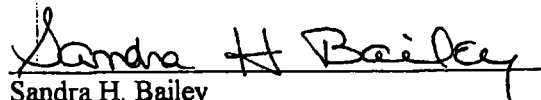
Ellis M. Johnston, II
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Calvin T. Vick
PO Box 2048
Greenville, SC 29602

Anne Ross Rosen
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Honorable Doyet A. Early, III
Post Office Box 90
Bamberg, South Carolina 29003-0090


Sandra H. Bailey
The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort, South Carolina 29901-1437

3-31, 2010



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

POST OFFICE BOX 1437 • BEAUFORT, SOUTH CAROLINA 29901-1437

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 843-525-6090
FAX: 843-525-6070

April 7, 2010

Honorable Julie J. Armstrong
Charleston County Court of Common Pleas
100 Broad Street
Charleston, SC 29401

Re: Rhoda G. Rentz, et al. vs. Orleans Gardens, A South Carolina Limited Partnership, et al.
C/A # 05-CP-10-4229

Dear Ms. Armstrong:

Enclosed please find an affidavit of Laurance H. Davis, Jr. and affidavit of Joel D. Bailey, with attached exhibits, relating to the above-referenced matter. These affidavits are being submitted in support of Plaintiffs' Motion for Recusal and Vacation of Orders. I would appreciate you filing them at your earliest convenience.

Thank you for your assistance in this matter. With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.

Joel D. Bailey
JDB/sb
Enclosures

cc: Ellis M. Johnston, II, Esquire (w/enclosures)
Calvin T. Vick (w/enclosures)
Marvin D. Infinger (w/enclosures)
Anne Ross Rosen (w/enclosures)
Thomas A. Pendarvis (w/enclosures)
Honorable Doyet A. Early (w/enclosures)

cc: Honorable Ginkler Boyd, P.A.

Date Recd: 4/12/10

C/A # 11471.0010

Docketed: MJS Scanning (ds)

cc: CTJ, EMJ, HGC, SL, MJS



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

POST OFFICE BOX 1437 • BEAUFORT, SOUTH CAROLINA 29901-1437

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 843-525-6090
FAX: 843-525-6070

April 9, 2010

Honorable Julie J. Armstrong
Charleston County Court of Common Pleas
100 Broad Street
Charleston, SC 29401

Re: Rhoda G. Rentz, et al. vs. Orleans Gardens, A South Carolina Limited Partnership, et al.
C/A # 05-CP-10-4229

Dear Ms. Armstrong:

Enclosed please find affidavits of Rhoda G. Rentz and Mary Jane Pike with regard to the above-referenced matter. These affidavits are being submitted in support of Plaintiffs' Motion for Recusal and Vacation of Orders. I would appreciate you filing them at your earliest convenience.

Thank you for your assistance in this matter. With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.

Joel D. Bailey
JDB/sb
Enclosures

cc: Ellis M. Johnston, II, Esquire (w/enclosures)
Calvin T. Vick (w/enclosures)
Marvin D. Infinger (w/enclosures)
Anne Ross Rosen (w/enclosures)
Thomas A. Pendarvis (w/enclosures)
Honorable Doyet A. Early (w/enclosures)

Haynesworth, Eirik, Esq., PA

Date Recd. 4/13/10

CN. # 11471.0010

Disputed: MFS to sea

CTV, EMJ, AGC, SL, MFS



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

POST OFFICE BOX 1437 • BEAUFORT, SOUTH CAROLINA 29901-1437

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 843-525-6090
FAX: 843-525-6070

April 12, 2010

Honorable Winnifa B. Clark
Orangeburg County Court of Common Pleas
Post Office Box 9000
Orangeburg, SC 29116

Re: Laurance H. Davis, Jr., et al. vs. Roosevelt Gardens, A South Carolina Limited Partnership,
et al.
C/A # 05-CP-38-1131

Dear Ms. Clark:

Enclosed please find an affidavit of Miles Hodge with regard to the above-referenced matter. This affidavit is being submitted in support of Plaintiffs' Motion for Recusal and Vacation of Orders. I would appreciate you filing them at your earliest convenience.

Thank you for your assistance in this matter. With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.

Joel D. Bailey
JDB/sb
Enclosures

cc: Ellis M. Johnston, II, Esquire (w/enclosures)
~~Calvin T. Vick~~ (w/enclosures)
Marvin D. Infinger (w/enclosures)
Anne Ross Rosen (w/enclosures)
Thomas A. Pendarvis (w/enclosures)
Honorable Doyet A. Early (w/enclosures)

Haynsworth Sinkler Boyd, P.A.

Date Rec'd 4/15/10

C/M #: 11471-0010

Docketed

IDL CTV, EMJ, HGG, SL, MLS



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

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EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 843-525-6090
FAX: 843-525-6070

April 16, 2010

Honorable Doyet A. Early, III
Post Office Box 90
Bamberg, South Carolina 29003-0090

Re: Davis, et al. vs. Parkview Apartments Limited Partnership, et al. (C/A # 03-CP-07-726)
Rantz, et al. vs. Orleans Gardens, et al. (C/A # 05-CP-10-4229)
Davis, et al. vs. Palmetto Apartments, et al. (C/A # 05-CP-07-1989)
Carolina Management Corporation, et al. vs. Pinewood Park Apartments, et al.
(C/A # 05-CP-07-1990)

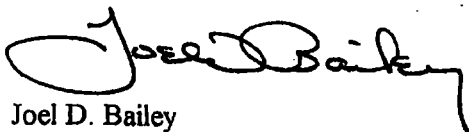
Dear Judge Early:

Enclosed please find copies of affidavits of Whaley Hinnant, Eva Marie Reynolds, and James & Erin Ivey, submitted in support of Plaintiffs' Motions for Recusal and Vacation of Prior Orders. These motions have been filed or sent for filing with the appropriate clerks of court.

By copy of this letter, I am serving opposing counsel of record with these affidavits.

Very truly yours,

THE BAILEY LAW FIRM, P.A.


Joel D. Bailey

JDB/lom
enclosures

cc: Ellis M. Johnston, II (w/enclosures)
Calvin T. Vick (w/enclosures)
Marvin D. Infinger (w/enclosures)
Anne Ross Rosen (w/enclosures)
Thomas A. Pendarvis (w/enclosures)

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Parkview Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A # 03-CP-07-726

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Roosevelt Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Orangeburg County
CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)
-vs-)
Orleans Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Charleston County
CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Palmetto Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A #2005-CP-07-1989

Carolina Management Corporation of)
Beaufort, *et al*, Plaintiffs,)
-vs-)
Pinewood Park Apartments, a South)
Carolina Limited Partnership, *et al*,)
Defendants.)

Beaufort County
C/A # 2005-CP-07-1990

CERTIFICATE OF MAILING

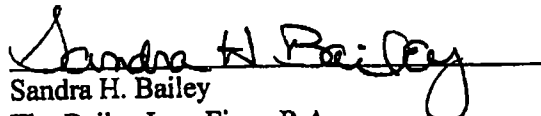
I hereby certify that I have served the Plaintiffs' Motion for Reconsideration, Alteration or Amendment, by depositing a copy in the United States Mail, postage prepaid, on April 22, 2010, addressed to the following attorneys of record:

Ellis M. Johnston, II
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Calvin T. Vick
PO Box 2048
Greenville, SC 29602

Anne Ross Rosen
134 Meeting Street, 3rd Floor
Charleston, SC 29401


Sandra H. Bailey
The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort, South Carolina 29901-1437

April 21, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2003-CP-07-0726

Laurance H. Davis, Jr.; Mary Jane R. Pike; Eva Marie Reynolds; and Rhoda G. Rentz, individually and in their capacities as the Limited Partners of Parkview Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

Parkview Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: AFFIDAVIT OF THOMAS A. PENDARVIS

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
April 22, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1990

Carolina Management Corporation of
Beaufort, James B. Jackson, Whaley R.
Hinnant, Jr., Mary Gasser Rawl and
Rhoda G. Rentz, individually and in their
capacities as the Limited Partners of
Pinewood Park Apartments, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Pinewood Park Apartments, a South
Carolina Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I
have served the documents listed below upon all counsel of record by mailing a copy of
same, postage prepaid and return address clearly indicated on said envelope, to said
counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: AFFIDAVIT OF THOMAS A. PENDARVIS

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
April 22, 2010

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-07-1989

Lawrence H. Davis, Jr.; Marvin D. McCarthy; James W. Ivey; and Erin E. Ivey, individually and in their capacities as the Limited Partners of Palmetto Apartments, a South Carolina Limited Partnership;

Plaintiffs,

vs.

CERTIFICATE OF SERVICE

Palmetto Apartments, a South Carolina Limited Partnership; Apartment Investment and Management Company a/k/a AIMCO; Insignia Financial Group, Inc.; AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John Doe, a generic designation for a party or parties whose true identity is unknown,

Defendants.

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: AFFIDAVIT OF THOMAS A. PENDARVIS

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
April 22, 2010

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO. 2005-CP-10-4229

Rhoda G. Rentz, Mary Jane Pike, Eva
Marie Reynolds, and Joanne O. Mercy,
individually and in their capacities as the
Limited Partners of Orleans Gardens, a
South Carolina Limited Partnership;

Plaintiffs,

vs.

Orleans Gardens, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I
have served the documents listed below upon all counsel of record by mailing a copy of
same, postage prepaid and return address clearly indicated on said envelope, to said
counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: AFFIDAVIT OF THOMAS A. PENDARVIS

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
April 22, 2010

STATE OF SOUTH CAROLINA
COUNTY OF ORANGEBURG

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NO. 2005-CP-38-1131

Laurance H. Davis, Jr., Rhoda G. Rentz,
Mortimer M. Weinberg, Jr., Hodge Land
Co., Inc. And Anna Trotter, individually
and in their capacities as the Limited
Partners of Roosevelt Gardens, a South
Carolina Limited Partnership;

Plaintiffs,

vs.

Roosevelt Gardens, a South Carolina
Limited Partnership; Apartment
Investment and Management Company
a/k/a AIMCO; Insignia Financial Group,
Inc.; AmReal Corporation a/k/a and f/k/a
USS Corporation a/k/a and f/k/a U.S.
Shelter Corporation; ISTC Corporation;
N. Barton Tuck, Jr.; and John Doe, a
generic designation for a party or parties
whose true identity is unknown,

Defendants.

CERTIFICATE OF SERVICE

I, Jennifer A. Clark, paralegal for Pendarvis Law Offices, PC, hereby certify that I have served the documents listed below upon all counsel of record by mailing a copy of same, postage prepaid and return address clearly indicated on said envelope, to said counsel at the following address:

Ellis M. Johnston, II, JD
Calvin T. Vick, Jr., JD
Jesse C. Belcher, Jr., JD
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville SC 29602

Documents Served: AFFIDAVIT OF THOMAS A. PENDARVIS

Jennifer A. Clark

Jennifer A. Clark

Beaufort, South Carolina
April 22, 2010

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Parkview Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A # 03-CP-07-726

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Roosevelt Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Orangeburg County
CA # 2005-CP-38-1131

Rhoda G. Rentz, *et al*, Plaintiffs,)
-vs-)
Orleans Gardens, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Charleston County
CA # 2005-CP-10-4229

Laurance H. Davis, Jr., *et al*, Plaintiffs,)
-vs-)
Palmetto Apartments, a South Carolina)
Limited Partnership, *et al*, Defendants.)

Beaufort County
C/A #2005-CP-07-1989

Carolina Management Corporation of)
Beaufort, *et al*, Plaintiffs,)
-vs-)
Pinewood Park Apartments, a South)
Carolina Limited Partnership, *et al*,)
Defendants.)

Beaufort County
C/A # 2005-CP-07-1990

CERTIFICATE OF MAILING

I hereby certify that I have served the Affidavit of Joel D. Bailey dated May 5, 2010, by depositing a copy of the same being filed in each of the above-captioned cases, in the United States Mail, postage prepaid, on May 5, 2010, addressed to the following:

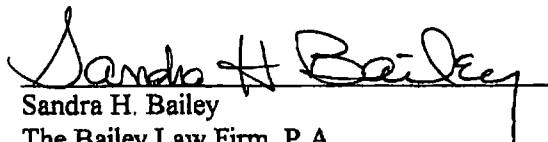
Ellis M. Johnston, II
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Calvin T. Vick
PO Box 2048
Greenville, SC 29602

Anne Ross Rosen
134 Meeting Street, 3rd Floor
Charleston, SC 29401

Honorable Doyet A. Early, III
Post Office Box 90
Bamberg, South Carolina 29003-0090


Sandra H. Bailey
The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort, South Carolina 29901-1437

May 5, 2010

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2010180087

Laurance H. Davis, Jr., Marvin D. McCarthy, James W.
Ivey, and Erin E. Ivey, individually and in their
capacities as the Limited Partners of Palmetto Apartments,
a South Carolina Limited Partnership, ... Appellants,

v.

Palmetto Apartments, a South Carolina Limited Partnership,
Apartment Investment and Management Company a/k/a
AIMCO, Insignia Financial Group, Inc., AmReal Corporation
a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation, ISTC Corporation, N. Barton Tuck, Jr., and John
Doe, a generic designation for a party or parties whose true
identity is unknown, ... Respondents.

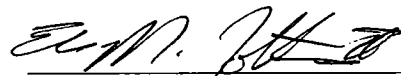
PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, he served
counsel for the Appellants with a copy of *RESPONDENTS'*, *MARVIN INFINGER'S*,
ANNE ROSEN'S, *AND JESSE BELCHER'S MOTION PURSUANT TO S.C.A.C.R. 264*
by mailing copies of the same by United States Mail with first class postage prepaid to
the following addresses:

ORIGINAL

Thomas A. Pendarvis
Pendarvis Law Offices, P.C.
500 Carteret Street, Suite A
Beaufort, South Carolina 29902-5066

Joel D. Bailey
The Bailey Law Firm, P.A.
PO Box 1437
Beaufort, South Carolina 29901-1437



Ellis M. Johnston, II

March 8th, 2011
Greenville, South Carolina

GREENVILLE

CHARLESTON

COLUMBIA

FLORENCE

Haynsworth
Sinkler Boyd, P.A.

ATTORNEYS AND COUNSELORS AT LAW

75 BEATTIE PLACE, 11TH FLOOR (29601-2119)
POST OFFICE BOX 2048 (29602-2048)
GREENVILLE, SOUTH CAROLINA
TELEPHONE 864.240.3200
FACSIMILE 864.240.3300
WEBSITE www.hsblawfirm.com

ELLIS M. JOHNSTON, II
DIRECT DIAL NUMBER 864-240-3217
EMAIL ejohnston@hsblawfirm.com

March 8, 2011

VIA U.S. MAIL

The Honorable Tanya Gee
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

MAR 09 2011

SC Court of Appeals

Re: *Laurance H. Davis, Jr. et al. v. Palmetto Apartments, et al.*
Case No. 2010180087

Dear Ms. Gee:

With regard to the above-referenced matters, enclosed please find an original and six (6) copies of the *Respondents'*, *Marvin Infinger's*, *Anne Rosen's*, and *Jesse Belcher's Motion Pursuant To S.C.A.C.R. 264* and *Proof of Service* for same with regard to the above-captioned appeal. I would appreciate your filing these at your earliest convenience and returning the additional enclosed copy, file-stamped to me in the self-addressed, stamped envelope.

With king regards, I remain

Very truly yours,

HAYNSWORTH SINKLER BOYD, P.A.


Ellis M. Johnston, II

EMJ,II:jmb
Enclosures

cc: Joel D. Bailey, Esquire
Thomas A. Pendarvis, Esquire



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

POST OFFICE BOX 1437 • BEAUFORT, SOUTH CAROLINA 29901-1437

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 843-525-6090
FAX: 843-525-6070

January 24, 2011

Ms. Tanya Gee, Clerk
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RE: Laurance H. Davis, Jr., et al. vs. Palmetto Apartments, et. al.
Case No. 2005-CP-07-1989
Case Tracking # 2010180087

Dear Ms. Gee:

Previously, a motion for a status conference and other relief was filed in a companion case on appeal, *i.e.*, Davis, *et al.* vs. Parkview Apartments, *et al.*, Case Tracking #2010180666. Last week we were informed by Elizabeth Carter of your office that a separate motion requesting such relief would need to be filed in each of the five (5) related appeals.

Accordingly, enclosed please find Appellants' Motion for Status Conference, for Consolidated Record, and to Stay Appeal Pending Hearing, and Memorandum in Support, together with an Affidavit of Joel D. Bailey. Also enclosed is proof of service and my firm's check in the amount of \$25.00 for the filing fee.

I would appreciate you filing these documents in the above-referenced appeal at your earliest convenience. Thank you for your assistance with this matter.

With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.

Joel D. Bailey

JDB/shb
enclosures

1032 25
RECEIVED

JAN 26 2011

SC Court of Appeals

cc: Ellis M. Johnston, II, Esquire (w/enclosures)
Calvin T. Vick, Jr., Esquire (w/enclosures)
Jesse C. Belcher, Jr., Esquire (w/enclosures)
Anne Ross Rosen, Esquire (w/enclosures)
Marvin D. Infinger, Esquire (w/enclosures)
Thomas A. Pendarvis, Esquire (w/enclosures)

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-07-1989

RECEIVED

JAN 26 2011

SC Court of Appeals

Laurance H. Davis, Jr., Marvin D. McCarthy, James W. Ivey
and Erin E. Ivey, individually and in their capacities as the
Limited Partners of Palmetto Apartments, a South Carolina
Limited Partnership. Appellants,

vs.

Palmetto Apartments, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

**APPELLANTS' MOTION FOR STATUS CONFERENCE, FOR
CONSOLIDATED RECORD, AND TO STAY APPEAL
PENDING HEARING, AND MEMORANDUM IN SUPPORT**

MOTION

The above-named Appellants in the above-captioned matter, together with the
Appellants in four (4) companion appeals, to-wit, *Laurance H. Davis, Jr., et al. v. Parkview
Apartments, et al.*, Case No. 2003-CP-07-726; *Carolina Management, et al. v. Pinewood
Park Apartments, et al.*, Case No. 2005-CP-07-1990; *Rhoda G. Rentz, et al. v. Orleans
Gardens, et al.*, Case No. 2005-CP-10-4229; and *Laurance H. Davis, Jr., et al. vs. Roosevelt*

Garden, et al., Case No. 05-CP-38-1131, hereby move, pursuant to Rule 224, SCACR, for an Order of this Court granting the following relief:

1. A Status Conference concerning the briefing schedule for the briefs in these five (5) appeals, as well as the feasibility for having such appeals heard on an expedited basis by this Court or, alternatively, directly by the South Carolina Supreme Court.
2. An Order permitting a single Record On Appeal for all five (5) of these appeals.
3. An Order staying the briefing schedule for all appeals until this Court rules upon this Motion.

MEMORANDUM IN SUPPORT

The Appellants in each case involved in these separate appeals are limited partners in limited partnerships wherein the above-named Respondents remain to this day general partners, with corresponding fiduciary duties to the Appellants as limited partners. For the most part, the Appellants are elderly, with some in their eighties (80's). Many have health issues. Some are widows. Virtually all have limited financial means. Resolution of the issues in these appeals within the earliest possible time frame and in the most economical manner, while nevertheless preserving their legal rights as citizen litigants, is essential to any concept of justice in light of their situation.

All five (5) of these lawsuits were assigned to the Honorable Doyet A. Early, III, by Order of South Carolina Supreme Court Chief Justice Toal, dated March 7, 2006. Three (3) of the cases were filed in the Beaufort County Court of Common Pleas, one (1) was filed in the Charleston County Court of Common Pleas, and one (1) was filed in the Orangeburg County Court of Common Pleas. The order of Chief Justice Toal assigning the cases to

Judge Early did not consolidate the cases for any purpose. The cases were initially treated separately by Judge Early, but he subsequently began to render decisions which dealt with all five (5) cases simultaneously. Ultimately, Judge Early issued a single Order dismissing all five (5) cases, despite the individual issues associated with each case. Additionally, Judge Early denied motions in each case by Appellants for recusal and for a protective order which would have given Appellants an opportunity to comply with his earlier rulings without waiving their legal positions, including their position concerning privileged communications with their attorneys, and to avoid the sanction of dismissal imposed by Judge Early. Notwithstanding the Appellants' disagreement with the factual bases asserted by Judge Early in his dismissal order, as well as in his denial of the motions for recusal and a protective order, the bases for the rulings also include, *inter alia*, departures from existing law in South Carolina, a reinterpretation of the law of this state concerning confidential communications between attorneys and their clients, and federal and state constitutional issues.

Appellants in the respective cases earlier sought appellate intervention, both in this Court and in the Supreme Court, but their positions were determined to be interlocutory in nature and were delayed until a final determination was made in the lower court.

Appellants have timely filed motions in the lower courts for reconsideration of Judge Early's orders, and have received written notice of the entry of orders by Judge Early denying all such motions, with the exception of orders in the cases filed in Orangeburg County. In an abundance of caution, Appellants have filed appeals in all five (5) cases, notwithstanding the lack of written notice of the entry of all of the orders from the respective Clerks of Court. Inasmuch as these motions and resulting orders are inextricably intertwined with the other

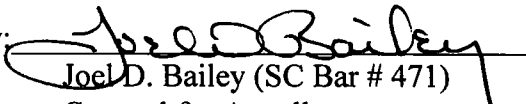
issues in each of the appeals, the Appellants believe they should all be included in the present requests for appellate relief as set forth in this motion, and ask for relief in the form of having the briefing process in each case held in abeyance until this Court can address and rule upon this motion.

Additionally, Appellants believe that, due to the multiplicity and complexity of these appeals, a status conference would be in the best interests of all concerned. Appellants specifically request that the status conference address, *inter alia*, (1) the feasibility for having these appeals heard on an expedited basis by this Court or, alternatively, directly by the South Carolina Supreme Court; (2) the briefing schedule for submission of the appellate briefs in each of these five (5) appeals; (3) permitting a single Record On Appeal for all five (5) of these appeals; and (4) any other issues which may expedite the appellate process and serve the interests of justice.

Respectfully submitted,

THOMAS A. PENDARIVS (SC Bar # 064918)
PENDARVIS LAW OFFICES, P.C.
500 Carteret St., Suite A
Beaufort, SC 29902-5066
843.524.9500 tel
843.524.9501 fax
Thomas@PendarvisLaw.com

Joel D. Bailey
THE BAILEY LAW FIRM, P.A.
PO Box 1437
Beaufort, SC 29901-1437
(843) 525-6090 tel
(843) 525-6070 fax
baileylawfirm@charter.net

By: 
Joel D. Bailey (SC Bar # 471)
Counsel for Appellants

January 24, 2011
Beaufort, South Carolina

OTHER COUNSEL OF RECORD:

Ellis M. Johnston, Jr., J.D.
Calvin T. Vick, J.D.
Jesse C. Belcher, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
P.O. Box 2048
Greenville SC 29602

Marvin D. Infinger, J.D.
Anne Ross Rosen, J.D.
Nexsen Pruettt, LLC
PO Box 486
Charleston SC 29402

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-07-1989

Laurance H. Davis, Jr., Marvin D. McCarthy, James W. Ivey
and Erin E. Ivey, individually and in their capacities as the
Limited Partners of Palmetto Apartments, a South Carolina
Limited Partnership. Appellants,

vs.

Palmetto Apartments, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

AFFIDAVIT OF JOEL D. BAILEY

Personally appeared before me **JOEL D. BAILEY** who, being first duly sworn,
states:

1. I am a resident and citizen of the City and County of Beaufort in the State of
South Carolina.

2. I am an attorney and have been continuously licensed to practice law in the State of South Carolina since 1973. I am the sole shareholder of The Bailey Law Firm, P.A., located at 510 Ribaut Road in Beaufort, South Carolina.

3. I, together with Thomas A. Pendarvis, Esquire, represent the Appellants in the above-captioned case, as well as the Appellants in four related cases. Like myself, Mr. Pendarvis is a sole practitioner.

4. The above-captioned case was filed in 2005; the other cases were filed in 2003 and 2005. No trial has ever taken place in any of these cases. The Appellants in each case are limited partners in limited partnerships wherein the above-named Respondents are general partners.

5. By Order of Chief Justice Jean H. Toal of the South Carolina Supreme Court dated March 7, 2006, the Honorable Doyet A. Early III, resident Circuit Court Judge for the Second Judicial Circuit, was assigned to all of these cases. The order assigning the cases to Judge Early did not consolidate the cases for any purpose. Judge Early has issued an order dismissing all five (5) cases. The basis of his order involves controversial and disputed rulings related to discovery in these cases, and Appellants believe that Judge Early has significantly departed from the existing statutory and case law of this State in the issuance of this order. Additionally, there are serious issues concerning confidential communications between Appellants and their counsel, as well as issues arising under both the Federal and State Constitutions.

6. Although the Order assigning the cases to Judge Early did not consolidate the cases, and although the cases were initially handled separately by Judge Early with respect

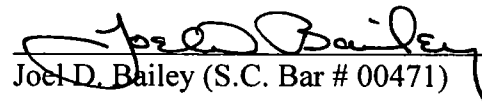
to motions made therein, he ultimately began to treat the cases in a consolidated manner and issued a single order dismissing all five (5) of the cases. Motions for reconsideration pursuant to SCRCP 59 were made in each case, and an order denying the motions has been signed by Judge Early. A separate order was signed by Judge Early on December 11, 2010 with regard to other Rule 59 motions. Counsel for the Appellants have not yet received written notices of the entry of the orders in each case; nevertheless, in an abundance of caution, appeals have been filed in all five (5) cases. Due to the nature of the disposition of the cases, counsel for the Appellants believe that a status conference should be held at the appellate level in order to provide for an orderly and equitable briefing schedule. Counsel for the Appellants also believe that a single record on appeal is in order.

7. Many of the Appellants are elderly; some are over eighty years of age. Most of the Appellants have on-going health problems; at least four (4) of the original limited partners have died and some of the Appellants are their widows and estates. Virtually all of the Appellants are retired, live on fixed incomes and have limited financial means.

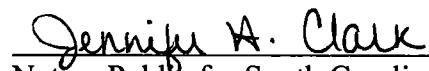
8. Counsel for the Appellants are informed and believe that based on the above circumstances, an altered briefing schedule is needed in order to prevent substantial economic hardship to Appellants and their counsel. Additionally, counsel for the Appellants believe that all appeals should be held in abeyance pending adoption of the briefing schedule by this Court. Furthermore, they are informed and believe that an expedited and economical resolution of the issues in these appeals, while preserving their legal rights as citizen litigants, is essential to any concept of justice in light of their situation.

9. Counsel for the Appellants have requested certain relief in the motion filed contemporaneously with this affidavit which is believed to be necessary in light of the unique circumstances involved in these appeals, and this affidavit is submitted in support of such motion, in accordance with Rule 224(c)(3), SCACR.

I have read the foregoing paragraphs and affirm that the information contained therein is true and accurate and is based upon my personal knowledge, observations and experience, except such information as may be stated to be based upon information and belief and, as to that information, I believe that it is true and accurate.


Joel D. Bailey (S.C. Bar # 00471)

Sworn to before me this
24th day of January, 2011


Notary Public for South Carolina

My Commission Expires: 7-8-2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-07-1989

RECEIVED

JAN 26 2011

SC Court of Appeals

Laurance H. Davis, Jr., Marvin D. McCarthy, James W. Ivey
and Erin E. Ivey, individually and in their capacities as the
Limited Partners of Palmetto Apartments, a South Carolina
Limited Partnership. Appellants,

vs.

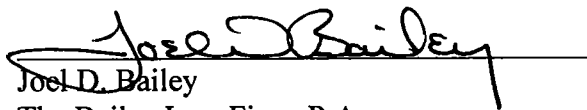
Palmetto Apartments, a South Carolina Limited Partnership;
Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

PROOF OF SERVICE

I, Joel D. Bailey, of The Bailey Law Firm, P.A., certify that I have served one (1) copy of Appellants' Motion for Status Conference, for Consolidated Record, and to Stay Appeal Pending Hearing, and Memorandum in Support, together with the Affidavit of Joel D. Bailey dated January 24, 2011 on counsel for Respondents, by depositing a copy of the same in the United States Mail, postage prepaid, on the 24th day of January, 2011, addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
HAYNSWORTH SINKLER BOYD, PA
PO Box 2048
Greenville, SC 29602

Marvin D. Infinger, J.D.
Anne Ross Rosen, J.D.
NEXSEN PRUETT LLC
PO Box 486
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Joel D. Bailey

The Bailey Law Firm, P.A.
PO Box 1437, 510 Ribaut Road
Beaufort, South Carolina 29901-1437

Counsel for Appellants

January 24, 2011
Beaufort, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2010180087

RECEIVED
FEB 04 2011

SC Court of Appeals

Laurance H. Davis, Jr., Marvin D. McCarthy, James W. Ivey, and Erin E. Ivey, individually and in their capacities as the Limited Partners of Palmetto Apartments, a South Carolina Limited Partnership, ... Appellants,

v.

Palmetto Apartments, a South Carolina Limited Partnership, Apartment Investment and Management Company a/k/a AIMCO, Insignia Financial Group, Inc., AmReal Corporation a/k/a and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter Corporation, ISTC Corporation, N. Barton Tuck, Jr., and John Doe, a generic designation for a party or parties whose true identity is unknown, ... Respondents.

RESPONDENTS' RETURN TO APPELLANTS'
MOTION FOR STATUS CONFERENCE, FOR
CONSOLIDATED RECORD, AND TO STAY APPEAL

Ellis M. Johnston, II
Calvin T. Vick, Jr.
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Greenville, SC 29602
Telephone: (864) 240-3200
Facsimile: (864) 240-3336

Respondents submit this Return to Appellants' motion subject to, and without waiving or abandoning, Respondents' pending Motions to Dismiss (discussed below). Appellants' recent motion in the above-captioned appeal is substantially similar to the Motion for Status Conference, for Consolidated Record, and to Stay Appeal filed by the appellants in a related appeal, *Laurance H. Davis, Jr., et al. v. Parkview Apartments, et al.*, Case No. 2010180666, on or about December 24, 2010. Accordingly, Respondents' response to the instant motion in this appeal is substantially similar to the Return to the Motion filed by Respondents in *Laurance H. Davis, Jr., et al. v. Parkview Apartments, et al.*, Case No. 2010180666, on December 30, 2010.

In an attempt to minimize the confusion that may arise with respect to the five (5) related appeals currently before this Court, and the motions pending in each of the five appeals, Respondents offer the following summary:

- On March 7, 2006, the Supreme Court of South Carolina assigned the Honorable Doyet A. Early, III "to hear and decide all pre-trial motions and other matters pertaining to these cases [five related cases], including the trial and post-trial motions."¹
- The five (5) cases assigned to Judge Early included *Laurance H. Davis, Jr., et al. v. Parkview Apartments, et al.*, Civil Action No. 2003-CP-07-726 ("Parkview Case"); *Laurance H. Davis, Jr., et al. v. Palmetto Apartments, et al.*, Civil Action No. 2005-CP-07-1989 ("Palmetto Case"); *Carolina Management Corporation, et al. v. Pinewood Park Apartments,*

¹ See Respondents' Motion to Dismiss, which is pending in this appeal, at Exhibit A thereto.

et al., Civil Action No. 2005-CP-07-1990 (“Pinewood Case”); *Laurance H. Davis, Jr., et al. v. Roosevelt Gardens, et al.*, Civil Action No. 2005-CP-38-1131 (“Roosevelt Case”); and *Rhoda G. Rentz, et al. v. Orleans Gardens, et al.*, Civil Action No. 2005-CP-10-4229 (“Orleans Case”) (these five cases are collectively referred to hereinafter as the “Five Lawsuits”). Each of the Five Lawsuits involved claims by limited partners that the general partners of the defendant limited partnerships had breached their fiduciary duties in connection with the 1984 sale of five properties located within the State. All of the sales, with the exception of Pinewood (which involved a similar form of sale), were part of the same deal. The defendant general partners are identical in each of the Five Lawsuits, and most of the limited partners appear as plaintiffs in multiple cases (e.g., Laurance H. Davis, Jr. is a plaintiff in three of the five cases).

- The same nine (9) orders entered by Judge Early in the Five Lawsuits, as well as the Supreme Court’s March 7, 2006 Order assigning the Five Lawsuits to Judge Early, are the subject of each of the five (5) pending, related appeals. Those five related appeals are: *Laurance H. Davis, Jr., et al. v. Parkview Apartments, et al.*, Court of Appeals Case No. 2010180666 (“Parkview Appeal”); *Laurance H. Davis, Jr., et al. v. Palmetto Apartments, et al.*, Court of Appeals Case No. 2010180087 (“Palmetto Appeal”); *Carolina Management Corporation, et al. v. Pinewood Park Apartments, et al.*, Court of Appeals Case No. 2010180088 (“Pinewood Appeal”); *Laurance H. Davis, Jr., et al. v. Roosevelt Gardens, et al.*, Court

of Appeals Case No. 2010180086 ("Roosevelt Appeal"); and *Rhoda G. Rentz, et al. v. Orleans Gardens, et al.*, Court of Appeals Case No. 2010176826 ("Orleans Appeal") (these five appeals are collectively referred to hereinafter as the "Five Appeals").

- The two (2) key orders, which are among the orders appealed in each of the Five Appeals, are: (1) a single written Order, which applies on its face to all Five Lawsuits (i.e., in the caption and in the body of the Order), signed by Judge Early on April 6, 2010, and entered as of April 9, 2010 by each clerk, granting Defendants' two motions for sanctions, finding plaintiffs in contempt of court, and **dismissing the Five Lawsuits** as sanctions for plaintiffs' contempt ("Sanctions Order"); and (2) a single written Order, which applies on its face to all Five Lawsuits, signed by Judge Early on September 16, 2010, and entered on September 20, 2010, **denying plaintiffs' single Motion for Reconsideration, dated April 22, 2010, which sought to alter or amend the Sanctions Order** ("Order Denying Motion for Reconsideration").² The other seven (7) orders of Judge Early, which are appealed in each of the Five Appeals, are interlocutory orders that preceded entry of the Sanctions Order.³

² See Notice of Appeal filed in each of the Five Appeals (copies of the single Sanctions Order and the single Order Denying Motion for Reconsideration are attached to each of the five Notices of Appeal as Exhibits 8 and 9, respectively); the Notices of Appeal are attached to the respective Memoranda in Support of Respondents' Motions to Dismiss in the Parkview, Palmetto, Pinewood and Roosevelt Appeals as Exhibit F (Orleans Notice of Appeal is attached to each of the above-referenced Memoranda as Exhibit E).

³ See Notice of Appeal in each of the Five Appeals at Exhibits 1 through 7 thereto. With one exception, each of those seven orders is a single written order, which applies on its face to all Five Lawsuits. The exception is the interlocutory order attached to each

- Counsel for Appellants in all Five Appeals, who represented the plaintiffs in all Five Lawsuits since at least 2005, have acknowledged that: (1) they received written notice of the entry of the single Sanctions Order no later than April 15, 2010;⁴ and (2) they received written notice of the entry of the single Order Denying Motion for Reconsideration no later than October 1, 2010.⁵
- The appellants in the Orleans Appeal served their Notice of Appeal on October 28, 2010, within 30 days of their receipt of written notice of the entry of the Order Denying Motion for Reconsideration. **However, the appellants in the Parkview, Palmetto, Pinewood and Roosevelt Appeals did not serve their respective Notices of Appeal until December 3, 2010, more than 60 days after they received written notice of the entry of the Order Denying Motion for Reconsideration.** In light of these facts, Respondents in the Parkview, Palmetto, Pinewood and Roosevelt Appeals filed Motions to Dismiss those appeals, pursuant to Rule 203, SCACR, on January 18, 2011. The Motions to Dismiss those four appeals remain pending before this Court.
- In response to the Motion for Status Conference, for Consolidated Record, and to Stay Appeal filed by the appellants in the Parkview Appeal on or

Notice of Appeal as Exhibit 6, which on its face applies to the Parkview Case, though it has been appealed in all Five Appeals.

⁴ See Plaintiffs' single Motion for Reconsideration with respect to the Sanctions Order, dated April 22, 2010, attached to each of the Memoranda in Support of Respondents' Motions to Dismiss as Exhibit C thereto.

⁵ See Notice of Appeal in the Orleans Appeal (at p. 2, ¶ 9), attached to each of the Memoranda in Support of Respondents' Motions to Dismiss as Exhibit E thereto.

about December 24, 2010, Respondents filed their Return on December 30, 2010, stating, *inter alia*, that they do not object to the appellants' request for a status conference concerning the five related appeals, **but the Court need not, and should not, grant such a status conference until after the Court has ruled on Respondents' Motions to Dismiss four of the appeals.** If the Court dismisses four of the appeals, many of the issues Appellants wish to discuss in the status conference (consolidation, one Record on Appeal, etc.) will be rendered moot.

With respect to Appellants' current motion, Respondents do not object to Appellants' request for a status conference concerning the Five Appeals, **but respectfully submit that the status conference need not, and should not, occur until the Court has ruled on Respondents' pending Motions to Dismiss four of the appeals.** If Respondents' Motions to Dismiss are granted, most of the issues Appellants wish to discuss in a status conference will become moot.

Although Respondents do not object to Appellants' request for a status conference following the Court's ruling on Respondents' Motions to Dismiss, they in no way consent to any other relief requested or alluded to in Appellants' motion, except for Appellants' request that there be a single Record on Appeal for the Five Appeals **if** four of the appeals are not dismissed.

Responding further, Respondents are not aware of any legitimate basis for having these appeals heard directly by the South Carolina Supreme Court.

Respondents are wary of Appellants' vague requests for a briefing schedule and for having the appeals heard on an expedited basis. Appellants have filed Notices of

Appeal with regard to thirteen (13) separate orders. Respondents anticipate that the Record on Appeal will be extraordinarily voluminous, as it will cover numerous motions, hearings and orders over the course of years of litigation. At this time, it is difficult for Respondents to predict the amount of time that will be necessary in order for Respondents to adequately respond to Appellants' brief. For these reasons, Respondents believe the briefing of the parties should proceed in accordance with the South Carolina Appellate Court Rules, subject to reasonable requests for extensions as permitted under the Rules.

The time period for filing Appellants' initial briefs in the Parkview, Palmetto, Pinewood and Roosevelt Appeals is stayed due to Respondents' pending Motions to Dismiss those appeals, pursuant to Rule 240(b), SCACR. Due to the similarity of the facts and issues presented in each of the five appeals, Respondents would consent to a stay of the time period for filing Appellants' initial brief in the Orleans Appeal until the Court has ruled on the Motions to Dismiss the other four appeals.

Respondents do not agree with Appellants' characterizations of certain orders, rulings and events in their motion and supporting affidavit, but they will refrain from arguing those matters until the appropriate time in the appellate process.

For the reasons set forth above, **Respondents respectfully request that the Court hold Appellants' motion in abeyance until the Court has ruled on the Respondents' pending Motions to Dismiss.** Respondents do not object to a stay of the time period for filing Appellants' initial brief in the Orleans Appeal (Case No. 2010176826) until the Court has ruled on the pending Motions to Dismiss.

Respectfully Submitted,

HAYNSWORTH SINKLER BOYD, PA



Ellis M. Johnston, II, SC Bar # 3065

Calvin T. Vick, Jr., SC Bar #68187

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tvick@hsblawfirm.com

ejohnston@hsblawfirm.com

Attorneys for Respondents

This 3rd day of February, 2011.
Greenville, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

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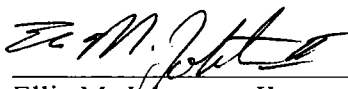
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Corporation, ISTC Corporation, N. Barton Tuck, Jr., and John
Doe, a generic designation for a party or parties whose true
identity is unknown, ... Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below, he served
counsel for the Appellants with a copy of *RESPONDENTS' RETURN TO APPELLANTS'*
MOTION FOR STATUS CONFERENCE, FOR CONSOLIDATED RECORD, AND TO
STAY APPEAL by mailing copies of the same by United States Mail with first class
postage prepaid to the following addresses:

Thomas A. Pendarvis
Pendarvis Law Offices, P.C.
500 Carteret Street, Suite A
Beaufort, South Carolina 29902-5066

Joel D. Bailey
The Bailey Law Firm, P.A.
PO Box 1437
Beaufort, South Carolina 29901-1437



Ellis M. Johnston, II

February 3, 2011
Greenville, South Carolina

GREENVILLE

CHARLESTON

COLUMBIA

FLORENCE

Haynsworth
Sinkler Boyd, P.A.

ATTORNEYS AND COUNSELORS AT LAW

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WEBSITE www.hsblawfirm.com

ELLIS M. JOHNSTON, II
DIRECT DIAL NUMBER 864-240-3217
EMAIL ejohnston@hsblawfirm.com

February 3, 2011

VIA U.S. MAIL

The Honorable Tanya Gee
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
FEB 04 2011
SC Court of Appeals

Re: *Laurance H. Davis, Jr. et al. v. Palmetto Apartments, et al.*
Case No. 2010180087

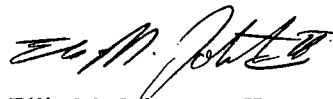
Dear Ms. Gee:

With regard to the above-referenced matters, enclosed please find an original and six (6) copies of the *Respondents' Return to Appellants' Motion for Status Conference, for Consolidated Record, and to Stay Appeal and Proof of Service* for same with regard to the above-captioned appeal. I would appreciate your filing these at your earliest convenience and returning the additional enclosed copy, file-stamped to me in the self-addressed, stamped envelope.

With king regards, I remain

Very truly yours,

HAYNSWORTH SINKLER BOYD, P.A.



Ellis M. Johnston, II

EMJ,II:jmb
Enclosures

cc: Joel D. Bailey, Esquire
Thomas A. Pendarvis, Esquire



THE
BAILEY LAW FIRM

A PROFESSIONAL ASSOCIATION

510 RIBAUT ROAD

POST OFFICE BOX 1457 • BEAUFORT, SOUTH CAROLINA 29901-1457

EMAIL ADDRESS:
BAILEYLAWFIRM@CHARTER.NET

PHONE: 843-525-6090
FAX: 843-525-6070

March 16, 2011

Honorable Daniel E. Shearouse
South Carolina Supreme Court
PO Box 11330
Columbia, SC 29211

RECEIVED

MAR 18 2011

S.C. Supreme Court

RE: Laurance H. Davis, Jr., et al. vs. Palmetto Apartments, et. al.
Case No. 2005-CP-07-1989

Dear Mr. Shearouse:

With regard to the above-referenced matter, enclosed for filing please find the original and six (6) copies of Appellants' Return to the Respondents' Motion Pursuant to SCACR 264. I understand that the Respondents filed this motion in the Court of Appeals last week; however, pursuant to Chief Justice Toal's order of March 9, 2011, we are filing our return with this Court. I am also enclosing the original proof of service.

I would appreciate you filing these documents in the above-referenced appeal at your earliest convenience. Thank you for your assistance with this matter.

With kindest regards, I am

Very truly yours,

THE BAILEY LAW FIRM, P.A.

Joel D. Bailey

JDB/shb
enclosures

cc: Ellis M. Johnston, II, Esquire (w/enclosures)
Calvin T. Vick, Jr., Esquire (w/enclosures)
Jesse C. Belcher, Jr., Esquire (w/enclosures)
Anne Ross Rosen, Esquire (w/enclosures)
Marvin D. Infinger, Esquire (w/enclosures)
Thomas A. Pendarvis, Esquire (w/enclosures)

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

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MAR 18 2011

S.C. Supreme Court

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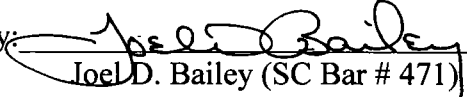
**APPELLANTS' RETURN TO RESPONDENTS', MARVIN
INFINGER'S, ANNE ROSEN'S AND JESSE BELCHER'S MOTION
PURSUANT TO SCACR 264**

It appears that the Respondents and their counsel wish to limit the roles of Mr. Infinger, Mr. Belcher and Ms. Rosen in this case to the proceedings which have taken place under Judge Early in the lower courts, and that their services are no longer needed now that the litigation has progressed to the appellate level. It also appears that the request of Mr. Infinger, Mr. Belcher and Ms. Rosen to be relieved as Respondents' counsel has been filed in both the lower courts and the appellate court. The Appellants are not opposed to their request to be relieved as counsel of record in either the lower courts or in the appellate court.

Respectfully submitted,

THOMAS A. PENDARIVS (SC Bar # 064918)
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(843) 525-6070 fax
baileylawfirm@charter.net

By: 
Joel D. Bailey (SC Bar # 471)
Counsel for Appellants

March 16, 2011
Beaufort, South Carolina

OTHER COUNSEL OF RECORD:

Ellis M. Johnston, Jr., J.D.
Calvin T. Vick, J.D.
Jesse C. Belcher, J.D.
HAYNSWORTH SINKLER BOYD, P.A.
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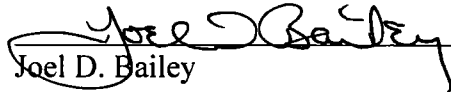
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I, Joel D. Bailey, of The Bailey Law Firm, P.A., certify that I have served one (1) copy of
Appellants' Return to Respondents' Motion Pursuant to SCACR 264 on counsel for the
Respondents, by depositing a copy of the same in the United States Mail, postage prepaid, on the
16th day of March, 2011, the same being addressed to:

Ellis M. Johnston, II, J.D.
Calvin T. Vick, Jr., J.D.
Jesse C. Belcher, Jr., J.D.
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PO Box 2048
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Counsel for Appellants

March 16, 2011

Beaufort, South Carolina

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vs.

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Apartment Investment and Management Company a/k/a
AIMCO; Insignia Financial Group, Inc.; AmReal Corporation
a/ka and f/k/a USS Corporation a/k/a and f/k/a U.S. Shelter
Corporation; ISTC Corporation; N. Barton Tuck, Jr.; and John
Doe, a generic designation for a party or parties whose true
identity is unknown Respondents.

**APPELLANTS' RETURN TO RESPONDENTS', MARVIN
INFINGER'S, ANNE ROSEN'S AND JESSE BELCHER'S MOTION
PURSUANT TO SCACR 264**

It appears that the Respondents and their counsel wish to limit the roles of Mr. Infinger, Mr. Belcher and Ms. Rosen in this case to the proceedings which have taken place under Judge Early in the lower courts, and that their services are no longer needed now that the litigation has progressed to the appellate level. It also appears that the request of Mr. Infinger, Mr. Belcher and Ms. Rosen to be relieved as Respondents' counsel has been filed in both the lower courts and the appellate court. The Appellants are not opposed to their request to be relieved as counsel of record in either the lower courts or in the appellate court.

Respectfully submitted,

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March 16, 2011
Beaufort, South Carolina

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THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2005-CP-07-1989

Laurance H. Davis, Jr., Marvin D. McCarthy, James W. Ivey
and Erin E. Ivey, individually and in their capacities as the
Limited Partners of Palmetto Apartments, a South Carolina
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vs.

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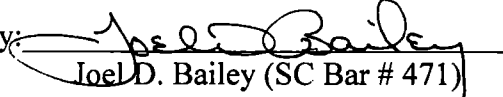
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