

THE STATE OF SOUTH CAROLINA

In the Supreme Court

**RECEIVED**

DEC 3 2014

**S.C. Supreme Court**

APPEAL FROM PICKENS COUNTY

Court of Common Pleas

The Honorable Doyet A. Early, III

Case No. 2012-CP-01554

Appellate Case No. 2014-000642

Julie Freeman,

Appellant-Respondent,

v.

J.L.H., LP a/k/a Hendrick Honda of Easley,

Respondent-Appellant

RECORD ON APPEAL

Vol. V

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**South Carolina Department of Motor Vehicles  
Application for a Temporary Motor Home or  
Travel Trailer Dealer License**

417-C  
(Rev. 10/05)

**The fee for a Temporary Vehicle Dealer License is \$20.00.**

Name of Dealership		
Address		
City	State	Zip Code
Dealer License Number	Name of Owner	
Type of Event	Date of Event (MM-dd-yy)	
Location of Event		
Dates License Required (MM-dd-yy)	FROM: - -	TO: - -

I, \_\_\_\_\_ hereby certify that I am a Motor Vehicle Dealer licensed to do business in South Carolina. I understand that this license is valid only for the sale of travel trailers and motor homes as specified in Sections 56-15-10, 56-15-310, and 31-17-520 of the South Carolina Code of Laws, as amended.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Full Name of Applicant

**INSTRUCTIONS**

1. This application must be mailed to the South Carolina Department of Motor Vehicles, Dealer Licensing Unit, PO Box 1498, Blythewood, SC 29206-0023 or submitted to a branch office of the Department of Motor Vehicles.
2. A temporary dealers license may be issued to a licensed motor vehicle dealer who sells or offers for sale motor homes and travel trailers as provided in Sections 56-15-10, 56-15-310, and 31-17-520 of the South Carolina Code of Laws, as amended.
3. The dealer license issued pursuant to this application applies to only one dealer operating in a temporary location and is not transferable to any other dealer or locations. The temporary license may only be issued for "fairs, recreational or sports shows, vacation shows, and other similar events or shows.
4. A temporary dealer license is valid for a period not to exceed ten (10) consecutive days and must be prominently displayed at the temporary place of business.
5. No dealer may purchase more than six (6) temporary licenses in any one calendar year.
6. The fee for each temporary license issued is twenty dollars (\$20.00).
7. Any person failing to secure a temporary license is guilty of a misdemeanor and, upon conviction, must be punished in the same manner as he would be punished for failure to secure his dealer's license.
8. This temporary license may not be construed as allowing the sale of any type of motor vehicle other than motor homes and travel trailers at authorized temporary locations.

**Please visit us on the web at [scdmvonline.com](http://scdmvonline.com)**



**South Carolina Department of Motor Vehicles**  
**30-DAY TEMPORARY PLATE REGISTRATION**

433  
Rev. 02/07

Pursuant to Section 56-3-2600 and 56-3-2900 of the 1976 Code of Laws of South Carolina as amended.

Plate No. Issued <b>TP-</b>	<b>FEE PAID \$20.00</b>	Date Plate Expires
--------------------------------	-------------------------	--------------------

Purchaser's Name \_\_\_\_\_ Date of Issue \_\_\_\_\_

Street \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Year	Make	Vehicle Identification Number

Dealer from whom vehicle and plate were purchased.

Street \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

\_\_\_\_\_ Print Name of Dealer \_\_\_\_\_ Signature of Dealer \_\_\_\_\_

**See conditions below.**

The South Carolina Department of Motor Vehicles, upon request shall provide temporary license plates and registrations designed by the department to nonresidents of South Carolina, licensed motor vehicle dealers and to manufacturers in South Carolina who produce trailers or semi-trailers that apply for such plates and cards.

Temporary license plate shall be on the vehicle for which issued and shall not be transferred, loaned, or assigned to any other person or vehicle.

Temporary license plate and registration shall be valid for thirty days from the date of issuance.

Permit good only for empty weight if issued on truck or property carrying vehicle.

Liability insurance coverage must be in force for at least the minimum amounts required by South Carolina law.

The registration should be carried in the vehicle described while in operation.

Date of issue, make, identification number and expiration date on actual temporary plate, must be written in permanent black ink or black ink covered with transparent tape.

**Motor Vehicle Dealers Only-** Dealers, subject to the limitations and conditions hereafter set forth, may issue such temporary license plates to owners of vehicles which are to be permanently licensed in a state other than South Carolina.

**Manufacturers of Trailers or Semi-Trailers in South Carolina only-**A manufacturer may issue a temporary plate to a trailer or semi-trailer that is being moved from the manufacturer to the dealer's or purchaser's place of business.

Department of Motor Vehicles copy of registration must be mailed to the South Carolina Department of Motor Vehicles, P.O. Box 1498, Blythewood, South Carolina 29016-0036 on the same day issued.

DEF 023  
**WHITE COPY - APPLICANT**  
 6-22

R.002002

• 30 DAY PLATE •

SOUTH CAROLINA

TP-00000

ISSUED \_\_\_\_\_ MAKE \_\_\_\_\_ IDENTIFICATION \_\_\_\_\_ EXPIRES \_\_\_\_\_

Form 433-A (Rev. 7/99)



**South Carolina Department of Motor Vehicles**  
**APPLICATION FOR TEMPORARY PERMIT AND PLATES**

FORM #433-B  
(Rev. 02/07)

Date \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_ Temporary Permits and Plates (10 Permits to a book)  
 ( Number of Books)

Name of Dealer/Applicant \_\_\_\_\_ County \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ ZIP Code \_\_\_\_\_

Dealer Number \_\_\_\_\_ Sales Tax Number \_\_\_\_\_

Enclosed you will find ( ) or ( ) Made payable to the South Carolina  
 Cash Money Order or Check

Department of Motor Vehicles.

\_\_\_\_\_  
 Signature of Dealer or Agent

Fee for each set of Permits and Plates is \$20.00.

**THIS SPACE FOR DEPARTMENT USE ONLY**

Number of Permits/Books Issued \_\_\_\_\_

Beginning Number \_\_\_\_\_ Ending Number \_\_\_\_\_ Total \_\_\_\_\_

Number of Temporary Plates \_\_\_\_\_

Beginning Number \_\_\_\_\_ Ending Number \_\_\_\_\_ Total \_\_\_\_\_

Total Permits Issued \_\_\_\_\_ Date of Issue \_\_\_\_\_

Issued By \_\_\_\_\_ Office Number and Code \_\_\_\_\_

Amount of Fees Collected \_\_\_\_\_

This will certify I have personally received all permits and plates listed in good condition.

Received By \_\_\_\_\_

WHITE-APPLICANT

YELLOW-DMV FILE

PINK-ACCOUNTING

GOLD-BRANCH OFFICE

DEF 023

R.002004



# South Carolina Department of Motor Vehicles

**BILL OF SALE**  
(Must Be Typed or Printed in Black Ink)

<b>FOR DEPARTMENT USE ONLY</b>	
Check One:	
<input type="checkbox"/>	Purchase License Plate
<input type="checkbox"/>	Transfer License Plate _____

I, \_\_\_\_\_  
Seller

Street \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

state that on the \_\_\_\_\_ day of \_\_\_\_\_ Yr. \_\_\_\_\_ the following vehicle:

MAKE \_\_\_\_\_ MODEL \_\_\_\_\_ BODY TYPE \_\_\_\_\_ YEAR \_\_\_\_\_

VEHICLE IDENTIFICATION NO. \_\_\_\_\_ LICENSE NO. \_\_\_\_\_

was sold to \_\_\_\_\_

Buyer

Street \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

And the above described vehicle is free of all liens and encumbrances in the buyer's name except:

(List here any mortgages, liens, or encumbrances)

Sale price of vehicle .....	\$ _____
Less trade-in .....	\$ _____
Taxable Total .....	\$ _____

Federal and State law requires that you state the mileage in connection with the transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

I state that the odometer now reads \_\_\_\_\_ (no tenths) miles and to the best of my knowledge that it reflects the **ACTUAL MILEAGE** of the vehicle described herein, **UNLESS** one of the following statements is checked.

**STOP!** DO NOT check one of the following unless it applies.

- \_\_\_\_\_ 1. I hereby certify that to the best of my knowledge the odometer reading reflects the amount of mileage in **EXCESS** of its mechanical limits.
- \_\_\_\_\_ 2. I hereby certify that the odometer reading is **NOT** the actual mileage. **WARNING: ODOMETER DISCREPANCY.**

**WARNING:** Federal and state law requires that you state the mileage in connection with the transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

\_\_\_\_\_  
Signature(s) of Buyer(s) / Date

\_\_\_\_\_  
Signature(s) of Seller(s) / Date

\_\_\_\_\_  
Hand Print Name(s) of Buyer(s)

\_\_\_\_\_  
Hand Print Name(s) of Seller(s)

**Return to: South Carolina Department of Motor Vehicles**  
**P.O. Box 1498**  
**Columbia, S.C. 29216-0024**

**ANY ALTERATION OR ERASURE VOIDS THIS DOCUMENT.**  
**ORIGINALS MUST BE SUBMITTED TO THE DEPARTMENT.**



# South Carolina Department of Motor Vehicles

452  
(Rev. 10-05)

## LOST/STOLEN OR DESTROYED LICENSE PLATE REPORT REPLACEMENT APPLICATION

### INSTRUCTIONS

This form must be completed by the requested owner, or his agent to replace a lost, stolen, or destroyed license plate and presented at any DMV Branch office, or mailed to the address listed below.

Department of Motor Vehicles  
DMV Customer Service Unit  
Attention: Mail-In Registration  
P.O. Box 1498  
Blythewood, South Carolina 29016-0019

1. License Plate No. \_\_\_\_\_ State \_\_\_\_\_ Year \_\_\_\_\_

2. Name and Address of Registered Owner:

Name \_\_\_\_\_

Street Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_

Telephone Number (Home) \_\_\_\_\_ (Work) \_\_\_\_\_

3. I certify that the plate listed above was: (circle one) Lost Stolen Destroyed

Date of Loss \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_

I do/do not (circle one) wish for another plate at this time. If the plate above is recovered, I will notify the nearest DMV Branch Office immediately. **If receiving another plate, complete Insurance Certification (below).**

Owner's Signature \_\_\_\_\_

Signature of Person Making Report \_\_\_\_\_

Print Name and Address of Person Making Report (if different from registered owner)  
\_\_\_\_\_

### INSURANCE CERTIFICATION

Under penalties of perjury, I declare this vehicle is insured with the company named below, and I will maintain liability insurance throughout the registration period.

\_\_\_\_\_  
Name of Insurance Company

\_\_\_\_\_  
Signature of Owner

\_\_\_\_\_  
Date

FOR DMV USE ONLY	
_____ VIN NUMBER	
_____ NEW LICENSE PLATE NUMBER	
_____ BRANCH OFFICE SUBMITTING	
_____ SPECIALIST SIGNATURE	
_____ DATE OF REPORT	_____ TIME OF REPORT

PLEASE PROVIDE CUSTOMER WITH A PHOTOCOPY OF THIS DOCUMENT.

DEF 023  
6-26

R.002006



# South Carolina Department of Motor Vehicles

## Application for Name and/or Address Change, Date of Birth and/or Social Security Correction, or Special Mailing

4057  
(Rev. 4/06)

SC Code of Laws § 56-1-230 Notification of change of address or name. Whenever any person after applying for or receiving a driver's license shall move permanently from the address named in such application or in the license issued to him or when the name of a licensee is changed by marriage or otherwise, such person shall within ten days thereafter notify the Department in writing of his old and new address or of such former and new name and of the number of any license then held by him.

Please check and complete all sections that apply in black ink.

<b>MY NAME ON RECORD WITH THE DEPARTMENT OF MOTOR VEHICLES IS:</b>																																	
Name: _____			Date of Birth: _____																														
Last	First	Middle	Suffix																														
<b>TITLE AND REGISTRATION INFORMATION</b>																																	
Customer No. _____		Vehicle Identification No. _____																															
License Plate No. _____		Make of Vehicle _____																															
<b>DRIVER RECORD INFORMATION</b>																																	
Customer No. _____		Driver's License No. _____																															
Identification Card No. _____		Beginner Permit No. _____																															
<input type="checkbox"/> <b>NAME CHANGE</b> (A court order or marriage license must accompany this form.)																																	
I hereby request that my name in the SCDMV records be changed to:																																	
Last	First	Middle	Suffix																														
<input checked="" type="checkbox"/> <b>RESIDENCE ADDRESS CHANGE</b> - Address where you reside or the address where the company is located. Cannot be a PO Box. My residence address is:		<input type="checkbox"/> <b>HOUSED ADDRESS CHANGE</b> - Address used for a vehicle that is primarily at an address different from the residence/company address. Example: company vehicle. My housed address is:																															
Street _____		Street _____																															
City _____ State _____ Zip Code _____ County _____		City _____ State _____ Zip Code _____ County _____																															
<input type="checkbox"/> <b>MAILING ADDRESS CHANGE</b> - Address where you want SCDMV to send you mail. My mailing address is:		<input type="checkbox"/> <b>TEMPORARY ADDRESS CHANGE</b> - Address where you will receive your mail on a temporary basis. Temp. Expiration Date _____																															
Street _____		Street _____																															
City _____ State _____ Zip Code _____ County _____		City _____ State _____ Zip Code _____ County _____																															
<input type="checkbox"/> <b>DATE OF BIRTH CORRECTION</b>																																	
Date of Birth Shown on Department Records		Correct Date of Birth																															
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> </tr> <tr> <td style="text-align: center;">Month</td> <td style="text-align: center;">Day</td> <td style="text-align: center;">Year</td> <td colspan="3"></td> </tr> </table>							Month	Day	Year				<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> </tr> <tr> <td style="text-align: center;">Month</td> <td style="text-align: center;">Day</td> <td style="text-align: center;">Year</td> <td colspan="3"></td> </tr> </table>							Month	Day	Year											
Month	Day	Year																															
Month	Day	Year																															
Supporting documentation is required. Please see form MV-93 and MV-94 for a list of acceptable documents to justify the correction.																																	
<input type="checkbox"/> <b>SOCIAL SECURITY NUMBER CORRECTION</b>																																	
Social Security Number Shown on Department Records		Correct Social Security Number																															
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> </tr> <tr> <td colspan="2"></td> <td style="text-align: center;">-</td> <td colspan="2"></td> <td style="text-align: center;">-</td> <td colspan="2"></td> </tr> </table>											-			-			<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> <td style="width: 20px; height: 20px;"></td> </tr> <tr> <td colspan="2"></td> <td style="text-align: center;">-</td> <td colspan="2"></td> <td style="text-align: center;">-</td> <td colspan="2"></td> </tr> </table>											-			-		
		-			-																												
		-			-																												
Supporting documentation is required. Please see form MV-93 and MV-94 for a list of acceptable documents to justify the correction.																																	
<b>MOTOR VOTER SECTION</b>																																	
<b>NOTE:</b> State Election Commission requires the customer to be physically present in the DMV office to update information with the Election Commission. Customers not transacting business in a DMV office should contact their County Board of Voter Registration to update voter registration information.																																	
<input type="checkbox"/> Yes, I wish to update my address with the Election Commission (customer must be physically present in DMV field office).																																	
<input type="checkbox"/> No, I do not wish to update my address with the Election Commission																																	
I hereby state that all information given and statements made herein are true and correct, and these changes are being made without fraudulent purpose or intent.																																	

Applicant's Signature \_\_\_\_\_

Date \_\_\_\_\_

Signature of DMV Customer Service Representative \_\_\_\_\_

Branch Office Name and Number \_\_\_\_\_

NOTE: Applications, with all needed supporting documents, may be mailed to:

S.C. Department of Motor Vehicles  
Alternative Media  
PO Box 1498  
Blythewood, SC 29016-0035

DEF 023

# **SECTION VII**

## **GLOSSARY OF TERMS**

7-1  
DEF 023

R.002008

# GLOSSARY OF TERMS

**Dealer or Motor Vehicle Dealer** refers to any person who sells or attempts to affect the sale of any motor vehicle in a calendar year.

**Dealer License** refers to a license issued to individuals authorizing them to sell motor vehicles.

**Distributor** refers to any person who sells or distributes new motor vehicles to motor vehicle dealers or who maintains distributor representatives within the state.

**Distributor Branch** refers to a branch office maintained by a distributor who sells or distributes new motor vehicles to motor vehicle dealers.

**Distributor Representative** refers to a representative employed by a distributor branch or distributor.

**Fair Market Value** refers to the total purchase price of a vehicle less the trade-in value.

**Franchise** refers to an oral or written arrangement for a definite or indefinite period in which a manufacturer, distributor, or wholesaler grants to a motor vehicle dealer a license to use a trade name, service mark, or related characteristic, and in which there is a community of interest in the marketing of motor vehicles or services related thereto at wholesale, retail, leasing or otherwise.

**Franchisee** refers to a motor vehicle dealer to whom a franchise is offered or granted.

**Franchiser** refers to a manufacturer, distributor, or wholesaler who grants a franchise to a motor vehicle dealer.

**Fraud** refers to a misrepresentation in any manner whether intentionally false or due to gross negligence of a material fact; a promise or representation not made honestly and in good faith; and intentional failure to disclose a material fact.

**Gross Weight** refers to the weight of a vehicle plus the weight of any load thereon.

**Manufacturer** refers to any person engaged in the business of manufacturing or assembling new and unused motor vehicles.

**Moped** refers to every cycle with pedals to permit propulsion by human power and with a motor of not more than 50 cubic centimeters which produces not more than two (2) brake horsepower and which is not capable of propelling the vehicle at a speed in excess of 30 miles per hour on level ground. If an internal combustion engine is used, the moped shall have a power drive system that functions directly or automatically without clutching or shifting by the operator after the drive system is engaged.

**Motorcycle** refers to a motorized cycle having no more than two (2) permanent functional wheels in contact with the ground or with a detachable side car or trailer and having a saddle for the use of the rider.

**Motor Home** refers to a vehicular unit designed to provide temporary living quarters built into an integral part of or permanently attached to a self-propelled motor vehicle chassis or van which contains permanently installed independent life support systems other than low voltage meeting the American National Standards Institute (ANSI) A 119.2 Standard for Recreational Vehicles and provides at least four of the following facilities: cooking with on-board power source separate from the vehicle engine; a portable water supply system including a faucet, sink, and water tank with an exterior service connection; separate 110-125-volt electric power supply.

**Motor Vehicle** refers to any motor-driven vehicle required to be registered and every vehicle which is self-propelled, except mopeds, and every vehicle which is propelled by electric power obtained from overhead trolley wires, but not operated upon rails.

**New Motor Vehicle** refers to a motor vehicle which has not been previously sold to any person except a distributor or wholesaler or motor vehicle dealer for resale.

**Non-Resident** refers to any person who is not a resident of this state.

**Odometer** refers to an instrument for measuring and recording the actual distance a vehicle travels while in operation; not any instrument designed to be reset by the operator.

**Odometer Disclosure Statement** refers to a statement certified by the owner of the motor vehicle to the transferee or the DMV indicating the odometer reading of the vehicle.

**Odometer Reading** refers to the actual cumulative distance traveled that is shown on the odometer.

**Owner** refers to a person who holds the legal title of a vehicle.

**Permanently Installed** refers to built into or attached as an integral part of a chassis or van and designed not to be removed except for repair or replacement. A system which is readily removable or held in place by clamps or tie downs is not permanently installed.

**Person** refers to a natural person, corporation, partnership, trust or other entity, and in the case of an entity, it shall include any other entity in which it has a majority interest or effectively controls as well as the individual officers, directors, and other persons in active control or the activities of any such entity.

**Sale** refers to the issuance, transfer, agreement for transfer, exchange, pledge, hypothecation or mortgage in any form whether by transfer in trust or otherwise of any motor vehicle or interest therein or of any franchise related thereto; any option, subscription or other contract, or solicitation, looking to a sale, or offer or attempt to sell in any form whether spoken or written. A gift or delivery of any motor vehicle or franchise with respect thereto with, or as a bonus on account of the sale of anything shall be deemed a sale of such motor vehicle or franchise.

**Semi Trailer** refers to every vehicle with or without motive power, other than a pole trailer, designed for carrying persons or property and for being drawn by a motor vehicle and so

constructed that some part of its weight and that of its load rests upon or is carried by another vehicle.

**Three-Wheel Vehicle (Trike)** refers to every motor vehicle having no more than three (3) permanent functional wheels in contact with the ground and having a seat or saddle for the use of the operator, but excluding a tractor.

**Total Purchase Price** refers to the price of a motor vehicle, motorcycle, boat, motor or airplane that was agreed upon by the buyer and the seller. This price allows for a trade-in value.

**Trailer** refers to every vehicle with or without motive power, other than a pole trailer, designed for carrying persons or property and for being drawn by a motor vehicle and so constructed that no part of its weight rests upon the towing vehicle.

**Travel Trailer** refers "Travel trailer" means every vehicle (except motor homes) designed without motor power towed by a motor vehicle and not measuring more than 8ft. wide or 35ft. long in travel mode, designed to provide temporary living quarters for recreational, camping, and travel use and designed not to require permanent on-site utilities.

**Truck** refers to every motor vehicle designed, used, or maintained primarily for the transportation of property.

**Truck Tractor** refers to every motor vehicle designed and used primarily for drawing other vehicles and not so constructed as to carry a load other than a part of the weight of the vehicle and load so drawn.

**Used Motor Vehicle** refers to a vehicle that was previously titled to another owner one or more times.

**Vehicle** refers to every device in, upon or by which any person or property is or may be transported or drawn upon a highway, except devices moved by human power or used exclusively upon stationary rails or tracks.

**Wholesaler or Motor Vehicle Wholesaler** refers to any person who sells or attempts to sell used vehicles exclusively to motor vehicle dealers or other wholesalers.

**Wholesale License** refers to a license issued to individuals authorizing them to sell motor vehicles to dealers or other wholesalers.

# NOTES

7-5  
DEF 023

R.002012

1 MR. THOMAS: Yeah, subject to the objections  
2 we made ---

3 THE COURT: I understand. Mr. Bennett did  
4 it already.

5 MR. BECKER: 27.

6 MR. THOMAS: Same issue.

7 MR. BECKER: 32.

8 MR. THOMAS: Same issue.

9 MR. BECKER: 33.

10 MR. THOMAS: Same issue.

11 MR. BECKER: And 34.

12 MR. THOMAS: Same issue.

13 THE COURT: Ms. Spruill, make sure what she  
14 has emailed over there is the same thing.

15 MS. SPRUILL: Yes, Your Honor.

16 (WHEREUPON, Defendant Exhibit Numbers 1, 3, 4, 5,  
17 6, 7, 8, 9, 10, 11, 15, 17, 18, 19, 20, 21, 22,  
18 23, 26, 27, 32, 33, and 34 were admitted into  
19 evidence.)

20 MR. BECKER: Your Honor, if we could also go  
21 ahead and just enter them on the record, the  
22 stipulation as to -- it is the stipulation with  
23 respect to Defendant's Exhibit 13, whether Julie  
24 Freeman-Hair's service records at Hendrick Honda of  
25 Easley ---

**Hendrick Honda Easley**  
**Closing Cost Allocation from Interviews**  
**2002 - Per Interviews**

	Total	Pro Rata	Per Closing
New and Used Car Sales Staff	\$ 396,800.00	25%	\$ 99,200.00
Accounting Office	\$ 137,905.00	69%	\$ 95,154.45
Finance <del>Managers</del>	\$ 191,727.00	55%	\$ 105,449.85
<del>Sales</del> Managers	\$ 320,978.00	55%	\$ 176,537.90
Printing, Postage, Supplies	\$ 44,555.00	66.5%	\$ 29,629.08
Data Processing Services	\$ 50,417.00	20%	\$ 10,083.40
Building & Utilities	\$ 93,743.00	10%	\$ 9,374.30
Outside Services	\$ 31,829.00	10%	\$ 3,182.90
			<u>\$ 528,611.88</u>
Total New Honda			614
Total Used Honda			407
			<u>1,021</u>
Closing Cost per Vehicle			<u>\$ 517.74</u>



**Hendrick Honda Easley**  
**Closing Cost Allocation from Interviews**  
**2003 - Per Interviews**

	<b>Total</b>	<b>Pro Rata</b>	<b>Per Closing</b>
New and Used Car Sales Staff	\$ 385,262.00	25%	\$ 96,315.50
Accounting Office	\$ 182,100.00	69%	\$ 125,649.00
Finance Managers	\$ 195,930.00	55%	\$ 107,761.50
Sales Managers	\$ 458,729.00	55%	\$ 252,300.95
Printing, Postage, Supplies	\$ 28,813.00	66.5%	\$ 19,160.65
Data Processing Services	\$ 57,114.00	20%	\$ 11,422.80
Building & Utilities	\$ 107,269.00	10%	\$ 10,726.90
Outside Services	\$ 51,488.00	10%	\$ 5,148.80
			<u>\$ 628,486.10</u>
<b>Total New Honda</b>			<b>764</b>
<b>Total Used Honda</b>			<b>463</b>
			<u><b>1,227</b></u>
<b>Closing Cost per Vehicle</b>			<u><u><b>\$ 512.21</b></u></u>

**Hendrick Honda Easley**  
**Closing Cost Allocation from Interviews**  
**2004 - Per Interviews**

	<b>Total</b>	<b>Pro Rata</b>	<b>Per Closing</b>
New and Used Car Sales Staff	\$ 397,426.00	25%	\$ 99,356.50
Accounting Office	\$ 158,196.00	69%	\$ 109,155.24
Finance Managers	\$ 165,802.00	55%	\$ 91,191.10
Sales Managers	\$ 415,209.00	55%	\$ 228,364.95
Printing, Postage, Supplies	\$ 46,087.00	66.5%	\$ 30,659.38
Data Processing Services	\$ 56,624.00	20%	\$ 11,324.80
Building & Utilities	\$ 114,020.00	10%	\$ 11,402.00
Outside Services	\$ 55,526.00	10%	\$ 5,552.60
			<u>\$ 587,006.57</u>
<b>Total New Honda</b>			790
<b>Total Used Honda</b>			431
			<u>1,221</u>
<b>Closing Cost per Vehicle</b>			<u>\$ 480.76</u>

**Hendrick Honda Easley**  
**Closing Cost Allocation from Interviews**  
**2005 - Per Interviews**

	<b>Total</b>	<b>Pro Rata</b>	<b>Per Closing</b>
New and Used Car Sales Staff	\$ 510,012.00	25%	\$ 127,503.00
Accounting Office	\$ 204,254.00	69%	\$ 140,935.26
Finance Managers	\$ 219,557.00	55%	\$ 120,756.35
Sales Managers	\$ 471,288.00	55%	\$ 259,208.40
Printing, Postage, Supplies	\$ 51,119.00	66.5%	\$ 34,006.91
Data Processing Services	\$ 79,544.00	20%	\$ 15,908.80
Building & Utilities	\$ 129,325.00	10%	\$ 12,932.50
Outside Services	\$ 58,559.00	10%	\$ 5,855.90
			<u>\$ 717,107.12</u>
<b>Total New Honda</b>			<b>974</b>
<b>Total Used Honda</b>			<b>528</b>
			<u><b>1,502</b></u>
<b>Closing Cost per Vehicle</b>			<u><b>\$ 477.43</b></u>

**Hendrick Honda Easley**  
**Closing Cost Allocation from Interviews**  
**2006 - Per Interviews**

	<b>Total</b>	<b>Pro Rata</b>	<b>Per Closing</b>
New and Used Car Sales Staff	\$ 500,965.00	25%	\$ 125,241.25
Accounting Office	\$ 232,297.00	69%	\$ 160,284.93
Finance Managers	\$ 238,859.00	55%	\$ 131,372.45
Sales Managers	\$ 442,873.00	55%	\$ 243,580.15
Printing, Postage, Supplies	\$ 55,620.00	66.5%	\$ 37,001.21
Data Processing Services	\$ 73,981.00	20%	\$ 14,796.20
Building & Utilities	\$ 158,487.00	10%	\$ 15,848.70
Outside Services	\$ 89,179.00	10%	\$ 8,917.90
			<u>\$ 737,042.79</u>
<b>Total New Honda</b>			<b>945</b>
<b>Total Used Honda</b>			<b>506</b>
			<u><b>1,451</b></u>
<b>Closing Cost per Vehicle</b>			<u><u><b>\$ 507.96</b></u></u>

**Hendrick Honda Easley**  
**Closing Cost Allocation from Interviews**  
**2007 - Per Interviews**

	<b>Total</b>	<b>Pro Rata</b>	<b>Per Closing</b>
New and Used Car Sales Staff	\$ 670,062.00	25%	\$ 167,515.50
Accounting Office	\$ 210,960.00	69%	\$ 145,562.40
Finance Managers	\$ 241,663.00	55%	\$ 132,914.65
Sales Managers	\$ 451,213.00	55%	\$ 248,167.15
Printing, Postage, Supplies	\$ 60,012.00	66.5%	\$ 39,922.98
Data Processing Services	\$ 71,102.00	20%	\$ 14,220.40
Building & Utilities	\$ 149,048.00	10%	\$ 14,904.80
Outside Services	\$ 134,446.00	10%	\$ 13,444.60
			<u>\$ 776,652.48</u>
<b>Total New Honda</b>			<b>1041</b>
<b>Total Used Honda</b>			<b>617</b>
			<u><b>1,658</b></u>
<b>Closing Cost per Vehicle</b>			<u><b>\$ 468.43</b></u>

**Hendrick Honda Easley**  
**Closing Cost Allocation from Interviews**  
**Summary - Per Interviews**

	<b>Total</b>	<b>Pro Rata</b>	<b>Per Closing</b>
New and Used Car Sales Staff	\$ 2,860,527.00	25%	\$ 715,131.75
Accounting Office	\$ 1,125,712.00	69%	\$ 776,741.28
Finance Managers	\$ 1,253,538.00	55%	\$ 689,445.90
Sales Managers	\$ 2,560,290.00	55%	\$ 1,408,159.50
Printing, Postage, Supplies	\$ 286,206.00	66.5%	\$ 190,398.54
Data Processing Services	\$ 388,782.00	20%	\$ 77,756.40
Building & Utilities	\$ 751,892.00	10%	\$ 75,189.20
Outside Services	\$ 421,027.00	10%	\$ 42,102.70
	<u>\$ 9,647,974.00</u>		<u>\$ 3,974,925.27</u>
<b>Total New Honda</b>			<b>5,128</b>
<b>Total Used Honda</b>			<b>2,952</b>
			<u><b>8,080</b></u>
<b>Closing Cost per Vehicle</b>			<u><u><b>\$ 491.95</b></u></u>

1 MR. THOMAS: Yeah, subject to the objections  
2 we made ---

3 THE COURT: I understand. Mr. Bennett did  
4 it already.

5 MR. BECKER: 27.

6 MR. THOMAS: Same issue.

7 MR. BECKER: 32.

8 MR. THOMAS: Same issue.

9 MR. BECKER: 33.

10 MR. THOMAS: Same issue.

11 MR. BECKER: And 34.

12 MR. THOMAS: Same issue.

13 THE COURT: Ms. Spruill, make sure what she  
14 has emailed over there is the same thing.

15 MS. SPRUILL: Yes, Your Honor.

16 (WHEREUPON, Defendant Exhibit Numbers 1, 3, 4, 5,  
17 6, 7, 8, 9, 10, 11, 15, 17, 18, 19, 20, 21, 22,  
18 23, 26, 27, 32, 33, and 34 were admitted into  
19 evidence.)

20 MR. BECKER: Your Honor, if we could also go  
21 ahead and just enter them on the record, the  
22 stipulation as to -- it is the stipulation with  
23 respect to Defendant's Exhibit 13, whether Julie  
24 Freeman-Hair's service records at Hendrick Honda of  
25 Easley ---



Michael W. Thompson, CPA/ABV, CFF, CFE, CGMA

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**Certifications**

Certified Public Accountant, GA  
Accreditation in Business  
Valuation, American Institute of  
Certified Public Accountants

Certified in Financial Forensics,  
American Institute of Certified  
Public Accountants

Certified Fraud Examiner

Chartered Global Management  
Accountant, American Institute  
of Certified Public Accountants

**Professional Affiliations**

American Institute of Certified  
Public Accountants

Georgia Society of Certified  
Public Accountants

Atlanta Kiwanis Association

**Education**

B.B.A. in Accounting, Georgia  
Southwestern University

Michael Thompson has over 20 years of experience in investigative accounting and litigation support. His case background includes a variety of complex matters relating to accounting malpractice, claims investigations and consultation, damage assessments, business valuation, risk management services and negotiation of various bond forms and endorsements. Michael has performed a variety of complex business interruption and lost profits analyses representing plaintiff and defense interests. Michael has also conducted a variety of fraud investigations and has analyzed companies' internal controls to minimize the potential for fraud including employee theft, improper authorizations, embezzlement, fictitious employees, dummy accounts payable, non-existent suppliers and subcontractor kickback schemes. Michael's position as President and CEO of Engineering and Fire Investigations exposed him to a variety of major performance bond defaults, including investigation and documentation of the surety's position, methods of mitigating damages as well as any attendant litigation. Michael has led many projects including developing and analyzing large databases as well as working collaboratively with attorneys, economists, engineers, scientists, and other technical experts.

Michael has extensive experience in crisis management accounting and has set up claims offices to manage pre-litigation mediation of economic damages related to the Oil Pollution Act of 1990. He has represented both plaintiff and defense interest in oil spill related economic damages in an effort to assist in providing a fair and accurate value of damages. Additionally, he has managed teams of CPA's in the development of complex business loss models for purposes of settlement and testimony.

Most recently, Michael has managed several cases involving internal fraud as well as valuations related to litigation on product liability and insolvency matters. In addition, Michael has performed insurance policy reviews and made recommendations with regard to potential unforeseen risks. The combination of Michael's accounting, grant management, insurance, and business skills has allowed him to provide insight that is unique in the industry.

Following Hurricane Katrina, Michael dedicated his efforts to maximizing insurance and FEMA reimbursements for several Louisiana political subdivisions and private non-profits affected by the storm. This task included the re-creation of portions of entities' financial statements including the Fixed Asset register, the Real Property register, and Inventories. Additionally, Michael has worked with engineers in the creation of proofs of loss including valuation of damages, summarizing lost profits, and managing reimbursements. Michael has also worked with public school systems on several issues including the improper use of federal funds, development of internal control practices and investigation of irregularities identified on the balance sheet.

Michael's understanding of policy and laws surrounding FEMA and the Stafford Act made him uniquely qualified to manage the FEMA reimbursement process on behalf of several governmental entities. Michael's experience related to FEMA extended from the formation and review of project worksheets to contract management, competitive bid processes,



## Michael W. Thompson, CPA/ABV, CFF, CFE, CGMA

purchase orders, invoice compliance and review, unit price negotiations, payment request and reimbursements. During Hurricane Katrina, Michael created and signed more than 1,000 project worksheets with numerous versions to each project worksheets as the scopes were better clarified. Michael has testified on numerous occasions of congressional sub-committees related to FEMA reimbursement processes and project worksheets.

Prior to Hurricane Katrina, Michael has had many other opportunities to work with FEMA public assistance and disaster recovery including several public entities in Texas related to Hurricane Ike and fire's in New Mexico during the 1990's.

Michael has served as a business advisor and expert witness for attorneys, risk managers, treasurers and insurance companies spanning the oil and energy, retail, hospitality, shipping, agricultural, chemical, and professional services industries. He has performed complex business interruption and cost analysis as they relate to catastrophic losses in an effort to validate and substantiate emergency response costs for major corporations in the United States, Europe, and Africa.

Prior to his forensic accounting experience, Michael worked as an accountant for two CPA firms and the U.S. Marine Corps. While in college, Mr. Thompson also worked as a Tax Service Representative for the Internal Revenue Service for two tax seasons.

### **Financial Advisory Services Experience**

#### ***Litigation and Investigations***

- Provided expert testimony in a fraud investigation involving employee collusion in related party contract disclosures and payments.
- Assisted in numerous commercial litigation cases on behalf of corporations and insurance companies including loss of profit valuations, fraud investigations, qui tam complaints, and internal investigations.
- Conducted an analysis relative to a fictitious employee scheme for public entity.
- Analyzed and calculated overbilling of emergency response costs for sub-contractors relative to several major oil spills throughout the U.S.
- Assisted in preparation of a fraud defense involving a variety of transactions between insurance brokers, the insured and insurance companies.
- Performed several internal investigations involving employee misconduct including diversion of assets / cash to third parties, misappropriation of funds, internal employee theft and collusive activities between third party contractors and employees.
- Provided expert testimony in IRS case involving apportionment of claim and proper IRS disclosures on behalf of claimant.
- Provided final review of claim to the United Nations on behalf of the Kuwaiti Government for damages sustained during Kuwaiti Gulf War.
- Consulted with attorneys in litigation regarding a pipe manufacturer subrogation case. Assisted in development of damage models and business interruption analysis.

#### ***Corporate Finance and Accounting***

- Worked in the re-creation of financial statements for a public sector entity affected by

## Michael W. Thompson, CPA/ABV, CFF, CFE, CGMA

Hurricane Katrina. Implemented processes and internal controls to track and document special revenue funds, Community Disaster Block Grant Funding and FEMA funding for major construction projects and content replacement.

- Managed the accounting and finance functions for a national professional services corporation, working with internal and external auditors to ensure Sarbanes-Oxley compliance.
- Conducted due diligence on several potential acquisitions of insurance related entities, and made recommendation to the Board regarding those acquisitions. Conducted numerous board meetings presenting financial performance of entities, and making recommendations to boards for strategic business decisions.
- Performed external auditing functions for numerous companies including retail and commercial publicly traded entities.

### ***Business Interruption and Insurance Claims***

- Performed business interruption analysis, negotiated claims and provided expert witness services on behalf of a chemical company for losses related to damages incurred from product contamination.
- Performed business interruption analysis of a chemical plant explosion in Spain. Determined the most efficient method of repair for maximum mitigation of damages; monitored reconstruction and critical path; and aided in cash flow management of project.
- Developed business interruption claims for a variety of retail and hospitality businesses damaged as a result of an oil spill in Tampa Bay.
- Monitored costs of oil spill clean-up and provided financial reporting to insurance company for shipwreck and potential oil spill in Mombasa, Kenya. Investigated contractor invoices that appeared to be irregular and negotiated payments as deemed appropriate.
- Monitored costs of oil spill clean up and provided financial reporting to a P&I insurance syndicate related to a oil spill in Louisiana. Developed business interruption claims for a variety of businesses injured by the oil spill.
- Developed business interruption models and expert consulting for a variety of entities as a result of damages from Hurricane Katrina.

### **Consulting Cases and Legislative Committee Testimony**

***E. I. Dupont De Nemours vs. Numerous Claimants*** – Performed more than 60 valuations of losses of inventory and future economic losses resulting from a contaminated fungicide. Performed expert services as necessary.

***Dow Chemical and Allied Products Corporation, Repsol Petroleum Corporation & Scor Re-Insurance Corporation*** – Performed consulting services in connection with a dispute of physical and economic damages resulting from a plant explosion in Tarragona Spain..

***A.P. Moller-Maersk Group & Repsol Petroleum Corporation*** – Performed consulting

Michael W. Thompson, CPA/ABV, CFF, CFE, CGMA

*services related to a case involving physical and economic losses due to a ship collision with a pier.*

**Government of Kuwait** – Performed consulting services valuing physical and economic damages for the refineries damaged resulting for Gulf War.

**Shell Oil Company** – Valuation, monitoring and fraud investigation of emergency response costs for ship wreck in Mombassa, Kenya.

**Ingram Barge Corporation vs. various claimants in Louisiana** – Valuation of economic damages for a variety of companies related to a barge collision in Gonzalez, Louisiana.

**Bouchard Transportation Company, Inc vs. Various Claimants in Florida** – Monitored emergency response costs and performed fraud investigations on a variety of companies engaged in overbilling schemes. Valuation of economic damages for a variety of claimants related to a barge collision off the coast of St. Pete Beach.

**CH&A Corporation v. Craddock, et al.** – Performed investigation related to allegations that an employee had created a fictitious company and diverted moneys to company owned by related parties.

**United States v. Follage Farms, Inc.** – Served as expert witness in connection with a dispute arising from allocation of claim benefits between asset replacement and future economic damages of a claim settlement.

**Orleans Parish School Board, State of Louisiana, et. al. vs. Lexington Insurance Company, et. al.** – Several cases involving fraud, embezzlement, physical and economic damages from Hurricane Katrina, and re-creation of elements of financial statements.

**Southwestern Bell Telephone, LP d/b/a AT&T Texas vs. City of Harlingen** – Provided expert witness services involving physical damages and loss of use of cut fiber optic cables.

**Mitchell Energy & Development Corporation, n/k/a Devon Energy Production Company vs. National Union Fire Insurance Company of Pittsburgh, PA.** – Performed expert witness services involving embezzlement and collusion between two employee and a third party trucking company.

**Ruth's Chris Steak House vs. Alliance Insurance Company** – Performed consulting services for economic damages claim resulting from Hurricane Katrina.

**Orleans Parish School Board, Recovery School District vs. National Union Ins. Co., et. al** – Performed consulting services involving policy interpretation, physical damages and business interruption losses as a result of damages from Hurricane Katrina

**State of Louisiana** – Performed a variety of economic damage calculations for multiple entities owned by the State of Louisiana as a result of damages from Hurricane Katrina. Testified in Legislative Subcommittees in Louisiana for Education subcommittee, finance subcommittee, Katrina recovery subcommittee, Board of Elementary and Secondary Education and the Orleans Parish School Board.

**Boart Longyear Company (2009)** – Performed review of internal fraud investigation conducted by client related to an alleged employee embezzlement scheme.

**A.A.A. Automotive Transmission vs. Ford Motor Company (2010)** – Performed damage valuations and provided expert services as a result of a fire due to an alleged manufacturing

Michael W. Thompson, CPA/ABV, CFF, CFE, CGMA

default.

**Readiness Management Support, L.C. v. JESCO Construction Corporation and County of Henderson, IL and Village of Gulfport, IL. (2010)** – Served as expert witness testifying contracting pricing, FEMA reimbursement practices and overall project management.

**S. Sanford and Sons Enterprises, LLC d/b/a Weezy's Movin on Up Café vs. United States Liability Insurance Group d/b/a Mount Vernon Fire Insurance Company (2011)** – Created proof of loss on behalf of plaintiff to fully document and testify as to reimbursable damages related to an insured peril of a restaurant.

**Mary P. Stinson v. Public Service Telephone Company and James L. Bond (2011)** – Served as expert witness testifying as to the quality and accuracy of an internal fraud investigation.

**Alvin Couch, Individually and in the Right of the Salt Factory, LLC v. Hicham Azhari, Fikret Kovac and I.N.C. Street Food LLC (2012)** – Performed investigation and am providing expert testimony with respect to allegations of misappropriation of funds by owners.

**Buffalo Rock Distributors (2012)** – Provided Expert Report with regards to valuation of several Whole Life Insurance Policies for purposes to determining taxable value as of the date policies were surrendered.

**Sysco Ceramic Tile LLC v. John Does 1-3 and Almee Sisco (2012)** – Performing embezzlement investigation regarding allegations of misappropriation of funds.

**Haiyan Lin v. Xuegang Leng (2012)** – Performed investigation and provided expert testimony with regards to concealment of financial interest of assets owned by defendant.

**Heather Herron, et. al. v. Dick Dyer & Associates, Inc., et. al. (2013)** – Performed analysis of costs with regards to closing fees charged by dealership and provided expert witness services.

**Publications and Presentations**

"Mold – The New Asbestos," RIMS, Continuing Education, Miami, FL 2003.

"Katrina – The Aftermath", RIMS, Continuing Education, Houston, TX 2006.

"Business Interruption Basics for Attorneys", South Texas Bar Association, Continuing Education, Houston, TX 2006.

"FEMA 101"- Continuing Education, Several times and locations, New Orleans, LA. And Houston, TX

"Financial Management for Non-profits" - Georgia Bar Association Webinar in conjunction with Pro Bono Partnerships or Atlanta, August 18, 2010

"Longleaf Technical Services, LLC Provides Rules for Retaining Forensic Experts to Investigate Occupational Fraud or Embezzlement" – PRWeb, August 17, 2011

"1099-K Merchant Services Tax Reporting Requirement Strives to Eliminate Unreported income" – Intuit Business Directory, September 4, 2011

**Michael W. Thompson, CPA/ABV, CFF, CFE, CGMA**

*"Atlanta CPA Firm Reports IRS Deadline For Foreign Financial Reporting Is June 30, 2012"*  
– Ezine, June 25, 2012

*"IRS "Fresh Start" Program Helps Certain Taxpayers Significantly Improve Credit Scores "* –  
Houston Chronicle, June 22, 2012

*"Fraud Challenges for Small Firms"* – Atlanta Journal Constitution, December 4, 2012

*"Tax Liabilities in 2013"* – Atlanta Journal Constitution, January 30, 2013

1 THE COURT: All right. He'll be qualified  
2 in that area. Thank you. Go ahead.

3 MR. BECKER: Your Honor, we'd also like to  
4 admit Exhibit Number 32, which is a copy of his  
5 current resume. Any object to that?

6 MR. BUTLER: Yes, Your Honor. I have  
7 objection to that. That's hearsay.

8 MR. BECKER: It's something he prepared.

9 MR. BUTLER: It's a statement offered in  
10 court for the truth of the matter asserted. I don't  
11 mind him testifying about it on the stand, but it  
12 shouldn't go into evidence.

13 THE COURT: I'll allow it.

14 MR. BECKER: Thank you, Your Honor.

15 (WHEREUPON, Defendant Exhibit Number 32 was  
16 admitted into evidence.)

17 Q. Let me just have you identify Exhibit Number 32.

18 Mr. Thompson, is this a copy of your current resume?

19 A. Yes, it is.

20 Q. All right. Now, Mr. Thompson, before you were  
21 asked to service as an expert ---

22 THE COURT: Well, who wrote it? I mean, I  
23 assume he wrote that?

24 MR. BECKER: Thank you.

THE STATE OF SOUTH CAROLINA

In the Supreme Court

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APPEAL FROM PICKENS COUNTY

Court of Common Pleas

The Honorable Doyet A. Early, III

---

Case No. 2012-CP-01554

Appellate Case No. 2014-000642

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Julie Freeman,

Appellant-Respondent,

v.

J.L.H., LP a/k/a Hendrick Honda of Easley,

Respondent-Appellant

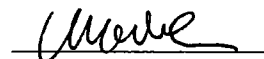
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CERTIFICATE OF COUNSEL

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The undersigned certifies that this Record on Appeal complies with Rule 210, SCACR.

RICHARDSON, PATRICK, WESTBROOK  
& BRICKMAN, LLC



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Attorneys for the Appellant-Respondent

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM PICKENS COUNTY

Court of Common Pleas

The Honorable Doyet A. Early, III

---

Case No. 2012-CP-39-01554

Appellate Case No. 2014-001110

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Julie Freeman,

Appellant-Respondent,

v.

J.L.H., LP a/k/a Hendrick Honda of Easley,

Respondent-Appellant

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PROOF OF SERVICE

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The undersigned employee of the law offices of Richardson, Patrick, Westbrook & Brickman, LLC attorneys for Appellant-Respondent, do hereby certify that service of the Record on Appeal was made on all counsel of record, specified below, by mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

James Y. Becker, Esq.  
Sarah P. Spruill, Esq.  
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Dec. 3, 2014

  
Chris Meyer, Paralegal to Brady R. Thomas