

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

DTZ, Inc., f/k/a UGL Services)
Unicco Operations Co., and f/k/a)
UNICCO Service Company)

Petitioners - Plaintiffs)

vs.)

South Carolina Procurement Review)
Panel, Chief Procurement Officer for)
The State Fiscal Accountability Authority,)
South Carolina State University and The)
State of South Carolina)

Respondents-Defendants)

Submitted By: John E. Schmidt, III)
Address: PO Box 11547, Columbia, SC 29211)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2015CP400 6879

SC Bar #: 4973
Telephone #: 803-748-1342
Fax #: 803-748-1210
Other:
E-mail: John.Schmidt@TheSCLawfirm.com

RECEIVED
2015 NOV 12 11:05
JEANETTE H. BRIDE
RICHLAND COUNTY
FILED

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- X JURY TRIAL demanded in complaint. X NON-JURY TRIAL demanded in complaint.
- This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- Contracts**
 - Constructions (100)
 - Debt Collection (110)
 - General (130)
 - x Breach of Contract (140)
 - Fraud/Bad Faith (150)
 - Failure to Deliver/Warranty (160)
 - Employment Discrim (170)
 - Employment (180)
 - Other (199)
- Inmate Petitions**
 - PCR (500)
 - Mandamus (520)
 - Habeas Corpus (530)
 - Other (599)
- Special/Complex /Other**
 - Environmental (600)
 - Automobile Arb. (610)
 - Medical (620)
 - Other (699)
- Torts - Professional Malpractice**
 - Dental Malpractice (200)
 - Legal Malpractice (210)
 - Medical Malpractice (220)
 - Previous Notice of Intent Case # 20__-NI-____
 - Notice/ File Med Mal (230)
 - Other (299)
- Administrative Law/Relief**
 - Reinstate Dry. License (800)
 - X Judicial Review (810)
 - Relief (820)
 - Permanent Injunction (830)
 - Forfeiture-Petition (840)
 - Forfeiture—Consent Order (850)
 - Other (899)
- Torts - Personal Injury**
 - Conversion (310)
 - Motor Vehicle Accident (320)
 - Premises Liability (330)
 - Products Liability (340)
 - Personal Injury (350)
 - Wrongful Death (360)
 - Assault/Battery (370)
 - Slander/Label (380)
 - Other (399)
- Judgments/Settlements**
 - Death Settlement (700)
 - Foreign Judgment (710)
 - Magistrate's Judgment (720)
 - Minor Settlement (730)
 - Transcript Judgment (740)
 - Lis Pendens (750)
 - Transfer of Structured Settlement Payment Rights Application (760)
 - Confession of Judgment (770)
 - Petition for Workers Compensation Settlement Approval (780)
 - Other (799)
- Real Property**
 - Claim & Delivery (400)
 - Condemnation (410)
 - Foreclosure (420)
 - Mechanic's Lien (430)
 - Partition (440)
 - Possession (450)
 - Building Code Violation (460)
 - Other (499)
- Appeals**
 - Arbitration (900)
 - Magistrate-Civil (910)
 - Magistrate-Criminal (920)
 - Municipal (930)
 - Probate Court (940)
 - SCDOT (950)
 - Worker's Comp (960)
 - Zoning Board (970)
 - Public Service Comm. (990)
 - Employment Security Comm (991)
 - Other (999)

Sexual Predator (510) Pre-Suit Discovery (670)

Submitting Party Signature: _____

Date: 11/12/15

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS
CIVIL ACTION NO. 15-CP-40-_____

DTZ, Inc., f/k/a UGL Services)
Unicco Operations co., and f/k/a)
UNICCO Service Company)

Petitioners-)
Plaintiffs)

vs.)

South Carolina Procurement Review)
Panel, Chief Procurement Officer for)
the State Fiscal Accountability)
Authority, South Carolina State)
University and)
The State of South Carolina)

Respondents-)
Defendants)

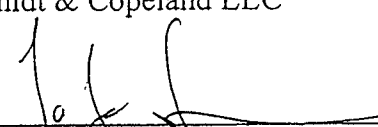
SUMMONS

RICHLAND COUNTY
FILED
2015 NOV 12 PM 3:05
JEANNETTE W. MCBRIDE
C.C.P. & G.S.

YOU ARE HEREBY SUMMONED and required to answer the Notice of Appeal and Petition for Judicial Review and Alternative Complaint for Breach of Contract and Quantum Meruit Recovery herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this pleading upon the subscriber at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to so answer the Petition for Judicial Review and Alternative Complaint for Breach of Contract and Quantum Meruit Recovery, judgment by default will be rendered against you for the relief demanded in therein.

[SIGNATURE ON FOLLOWING PAGE]

Schmidt & Copeland LLC



John E. Schmidt, III

S.C. Bar No. 4973

John.schmidt@thesclawfirm.com

Melissa J. Copeland

S.C. Bar No. 5904

Missy.copeland@thesclawfirm.com

1201 Main Street, Suite 1100

P.O. Box 11547(29211)

Columbia, SC 29201

803.748.1342 (phone)

803.748.1210 (fax)

Attorney for Petitioner

DTZ, Inc.

Columbia, South Carolina

November 12, 2015

JURY TRIAL DEMANDED AS TO COMPLAINT FOR BREACH OF CONTRACT



Attorneys and Counselors at Law

John E. Schmidt, III
803.348.2984
John.Schmidt@TheSCLawfirm.com

Melissa J. Copeland
803.309.4686
Missy.Copeland@TheSCLawfirm.com

November 12, 2015

RECEIVED

NOV 12 2015

SC Court of Appeals

SENT VIA US MAIL AND CERTIFIED MAIL

Hon. Alan Wilson
South Carolina Attorney General
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211

J. Emory Smith, Jr.
Deputy Solicitor General
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211

Hon. C. Brian McLane, Sr., Chairman
Christie M. Emanuel, Counsel
South Carolina Procurement Review Panel
1105 Pendleton Street, Suite 209
Columbia, SC 29201

Dr. W. Franklin Evans, President and
Craig Burgess, Esq., General Counsel
South Carolina State University
300 College St. NE
Orangeburg, SC 29117

William Dixon Robertson III
Assistant General Counsel
Office of General Counsel
State Fiscal Accountability Authority of South Carolina
1201 Main Street, Suite 350
Columbia, SC 29201

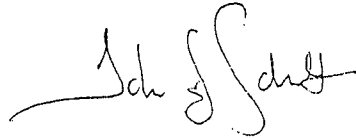
David Avant, Interim Executive Director
State Fiscal Accountability Authority of South Carolina
612 Wade Hampton Office Building
Columbia, South Carolina 29201

RE: Notice of Appeal and Petition for Judicial Review and Complaint -

Dear Sirs:

Please find enclosed for service upon you as provided under law a copy of the Summons and Notice of Appeal and Petition for Judicial Review and Alternative Complaint for Breach of Contract and Quantum Meruit Recovery. These documents have been filed in Court this day in accordance with applicable law and rules, and are hereby served upon each of you this day by US Mail and by Certified Mail. They are also separately being served as permitted via hand delivery. A copy of this filing is also being served on the South Carolina Attorney General as provided for by governing law and rule.

Very truly yours,

A handwritten signature in black ink, appearing to read "John E. Schmidt, III". The signature is fluid and cursive, with a large initial "J" and "S".

John E. Schmidt, III

cc: South Carolina Attorney General.

AFFIDAVIT/CERTIFICATE OF SERVICE

The undersigned, an employee of Schmidt & Copeland LLC, hereby swear on pain and penalty of perjury, affirm and certify that I have served all of the below named persons, entities and agencies in this action, comprising all parties of record, with a copy of the attached Summons and Notice of Appeal and Petition for Judicial Review and Alternative Complaint for Breach of Contract and Quantum Meruit Recovery by mailing a copy of the same by United States Mail, postage prepaid, and by Certified Mail to the following addresses on the date set forth below:

Served Upon:

Hon. Alan Wilson
South Carolina Attorney General
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211

J. Emory Smith, Jr.
Deputy Solicitor General
Office of the Attorney General
P.O. Box 11549
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Hon. C. Brian McLane, Sr., Chairman
Christie M. Emanuel, Counsel
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John Schmidt

November 12, 2015