

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Case No: 2014-002029

RECEIVED

MAR 28 2016

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

SC Court of Appeals

Judge Doyet A. Early, III, Circuit Court Judge

Case No. 2008-CP-40-6656

John R. Rakowsky, Respondent

v.

Irene Santacroce, *Appellant*
Estate of Doris Holt, *Appellant*
Rodney Lail, *Appellant*

and

James B. Spencer, *Appellant, Pro Se*

RESPONSE TO REPLY
TO CLARIFY THE RECORD

Irene Santacroce, the Estate of Doris Holt, Rodney Lail, represented by the undersigned counsel, Michael Sribnick, MD, JD, (hereinafter “represented Appellants”) and James Spencer on a *Pro Se* basis, humbly move this Court to allow this response to Respondent’s Reply, dated March 21, 2016, under Rule 240 in the name of equity and fairness to clarify the record.

POINTS OF CLARIFICATION

- Respondent claimed that on page 2, Item 1 (**Attached hereto as Document # I**) of her Reply that the following document existed, “Form Order of December 17, 2013 signed by Judge Barber, Case No. 2008-CP-40-6656” was in the “filed” case records at the Richland County Clerk of Court’s office. Respondent’s counsel included that document attached hereto and marked **Document # II** to prove her point. Please note Respondent’s counsel designated document could not be found even by her. This document clearly is not the record Respondent’s counsel designated which the Respondent has villainized the Appellants for not including in the Record on Appeal. The document has nothing to do with Judge Barber nor his rulings as claimed by Respondent. However, despite that fact Respondent’s counsel herself refuses to admit she cannot locate if in fact it even exists.
- Respondent claimed on page 2, Item 6 of her Reply that the following document existed, “Form 4 Order of Judge Early (re: Omnibus Emergency

Motions) filed September 11, 2014.” Respondent’s counsel also included it as the purported document in her Reply attached hereto marked as **Exhibit C**. However, on September 29, 2014, Appellants searched the entire file for case No. 2008-CP-40-6656 in the Clerk of Court’s office document by document along with Administrative Deputy Clerk, Ms. Gloria Tribble. The file search included reviewing the Richland County on line case record for the same matter. The search, verified by Gloria Tribble, could only locate one applicable document listed on the computer and in the file, date stamped as filed on September 18, 2014. (See **Exhibit A pages 4 and 5** attached hereto as part of the included sworn affidavit.) Respondent’s **Exhibit C**, was date stamped September 11, 2014.

Significantly, on September 29, 2014, the document attached by Respondent’s counsel dated September 11, 2014 was not in the file and there was no record of it having been received on the Clerk of Court’s computerized records system.

Evidence suggests that someone has been switching documents in the Clerk of Court’s files. **Attached Exhibit B**, is a print out of the Clerk of Court’s computerized records system as of March 24, 2016. It contains no record of the document filed and date stamped September 18, 2014 by the Clerk of Court as documented in **Exhibit “A” page 5**. The Appellants have

absolutely no reason to be involved in such swapping games as a case on the merits is not in any way impacted by these documents.

However, it does affect the certification of correctness of the Joint Appendix required by the Appellants under Rule 210 (g) SCACR and therefore causes undue delays of a hearing of the merits of this legal action sought since 2008 by the Appellants.

- Respondent claimed on page 2, Item 9, that the document entitled “Reply to Counterclaims to Second Amendment (*sic*) Complaint for Interpleader, filed February 18, 2011” had not been included in the Joint Appendix by the Appellants. However, the document provided by Respondent’s counsel as evidence of what she believes the Appellants should have inserted was never received by any of the Represented Appellants nor the *Pro Se* Appellant. In that regard, it did not even have the required certificate of service attached to it. See attached Affidavit of *Pro Se* Appellant, **Exhibit D**. The undersigned Counsel for the Represented Appellants has confirmed the same lack of receipt of documentation in regard to counterclaims with his clients.

This item’s description provided by the Respondent in his designation of matter is extremely misleading, as based on the records it appears to ask the Appellants to provide a “Ghost Document,” one that does not appear until it is out of time sequence at the end of the case. In that regard, none of the

Appellants in this case or defendants in the underlying case filed Counterclaims to the Respondent's Second Amended Complaint until *August 29, 2011*, seven months after the date of the Respondent's Reply filed on February 18, 2011. Filing a Reply in opposition to Counterclaims that were not filed until seven months later is extremely unusual. It is also unusual that no Appellant received a copy of the document that is listed in Respondent's Designation. It appears the Respondent failed to meet the requirement of SCACR 209(c) that states, "The Designation must clearly identify what the party desires to have included in the Record on Appeal." The requirement to include a "ghost document" that was never received by the Appellants and probably never served on them is "beyond the pale."

The Appellants made every reasonable effort to complete the Record on Appeal as correctly as they could under the circumstances that exist. However, when the Respondent produces to the Court documents that do not correctly comply with the Respondent's Designated documents in an attempt to prove a lack of diligence in order to have the appeal dismissed, something is very wrong.

For eight years, the Appellants have only sought two items from the Respondent, who brought this frivolous lawsuit against the Appellants. Respondent has refused to produce either legally required document during

the entire eight years. First the Appellants have sought what was required of the Respondent under Court Rule 407 1.8(g) before there can be a settlement, a mutually agreed upon distribution of funds among the seven independent parties represented by the Respondent, a written informed consent agreement. Second, the Appellants have sought the records required to be kept by the Respondent regarding the accounting of the remaining litigation funds under Rule 1.15 (a) in accordance with Rule 417, SCACR (Financial Recordkeeping). Therefore, the Appellants have no reason to hold back any of the hundreds of pages designated by Respondent.

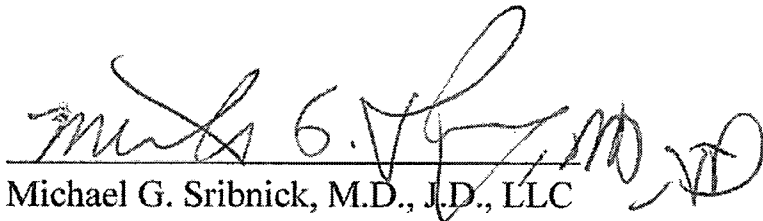
REMEDY

It is requested that the Court either strike these designations or have Respondent submit them as supplements under SCACR 212(b). This will allow the Respondent to provide documents to be included in the Record of Appeal without being distracted by generating requests to find documents that either do not exist or cannot be found in what appears to be nothing more than a method for Respondent to have this case dismissed without a review of the merits. By taking this step, the Court should instantaneously generate a Joint Appendix. Furthermore, for all of the reasons set forth above the motion to have this appeal dismissed should be denied.

SIGNATURES ON FOLLOWING PAGE

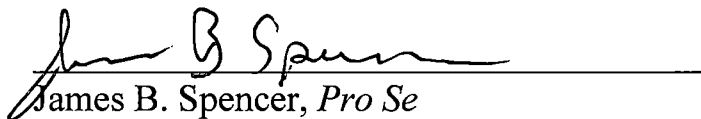
Submitted this March 28, 2016,

By:

A handwritten signature in black ink, appearing to read "Michael G. Sribnick, M.D., J.D., LLC". The signature is written over a horizontal line.

Michael G. Sribnick, M.D., J.D., LLC
3 Kenilworth Avenue
Charleston, S.C. 29403
Phone: (843) 789-3504
Fax: (843) 720-8907
Email: michael.g.sribnickmdjdlc@gmail.com

By:

A handwritten signature in black ink, appearing to read "James B. Spencer". The signature is written over a horizontal line.

James B. Spencer, *Pro Se*
Suite 183
7001 Saint Andrews Road
Columbia, SC 29212

Item 1. Form Order of December 17, 2013 signed by Judge Barber, Case No. 2008-CP-40-6656.

Item 6. Form 4 Order of Judge Early (re: Omnibus Emergency Motions) filed September 11, 2014

Item 9. Reply to Counterclaims to Second Amendment Complaint for Interpleader, filed February 18, 2011.

As to designated Item 15, Appellants are correct that Rakowsky's designation contained a typographical error in the reference date used in the designation (correct date October 4, 2014). A copy of the correct email is enclosed for clarity.

At no point has Rakowsky's counsel been contacted by the *pro se* Appellant or Appellant's counsel in an effort to obtain a copy of these documents¹. Appellants have had almost three months (designations filed and served on December 30, 2015) to ask for assistance in locating the documents designated. The insinuation that Rakowsky designated matters that do not exist, simply to make things more difficult for Appellants, is absurd.

The appellate court rules do not allow an Appellant to unilaterally omit items designated by a party. At a minimum, an appellant must make a reasonable effort to

¹ Mr. Spencer claims that he cannot communicate because he is blocked from email access to with Rakowsky's counsel. He is blocked from communication via email as he mentions, but that measure was a protective one in response to prior abuse effectuated via email. It was a reasonable measure, taken with direct and adequate notice, almost two years ago. See attached email dated May 14, 2014. Rakowsky nor his counsel have seen any order requiring that communications between parties be conducted via email. Appellants have a habit of referencing isolated lines from the transcript of a status conference with Judge Barber and claiming they are "orders of Judge Barber" when they are not, in fact, orders.

Even so, since the openly declared moratorium on email, other means of communication have remained accessible and acceptable. Mr. Spencer or one of his agents have hand delivered copies of filings in this matter to our office, during which neither he nor the documents being delivered have ever been refused or turned away. Had either Mr. Spencer or Mr. Sribnick bothered to communicate in any other manner besides email, including any of those expressly indicated as remaining acceptable (i.e. phone, fax, or regular mail), copies of any documents believed to have been unavailable, mistakenly referenced or not in existence could have been provided promptly. No one ever asked.

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 2008-CP-40-6656

John R. Rakowsky

Southern Holdings Inc., defendant, et al

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: _____

Attorney for : Plaintiff Defendant or Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON): Rule 12(b), 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:

That this case be assigned to the Honorable Doyet A. Early, III to hear and handle all pre-trial motions and other matters pertaining to this case.

ORDER INFORMATION

This order ends does not end the case.

Additional Information for the Clerk : _____

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge

J. P. Manning

Judge Code 2061

Date 12/17/13

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20____ and a copy mailed first class or placed in the appropriate attorney's box on this 30 day of Dec, 2013 to attorneys of record or to parties (when appearing pro se) as follows:

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter _____

Clerk of Court

Jeanette W. McFarland

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Doyet A. Early, III. Circuit Court Judge

Case No. 2008-CP-40-6656

Appellate Case No. 2014-002029

John R. Rakowsky.....Respondent

Adrian I. Falgione,
James Spencer,
Estate of Doris Holt, Irene
Santacroce, and Rodney Keith Lail.....Defendants

Of whom, Estate of Doris Holt, Irene Santacroce, and Rodney
Lail, are.....Appellants

AFFIDAVIT OF ROBERT WADLEY



PERSONALLY APPEARED before me the undersigned Robert Wadley who after being duly sworn states the following:

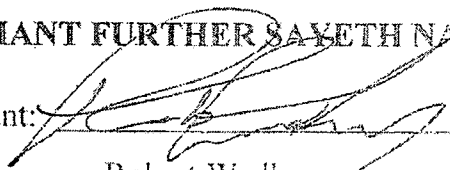
I, Robert Wadley, declare under penalty of perjury:

1. I am over eighteen years of age and am qualified to testify.
2. The information in this affidavit is based on my personal knowledge.
3. I am a part time legal assistant for Dr. Michael Sribnick, Esquire and have been doing legal research of this nature for over two years.
4. In the above named capacity, on September 29, 2014, I went to the Richland County Clerk of Court's Office to review the files regarding Case No. 2008-CP-40-6656 as directed by Dr. Michael Sribnick, Esquire.
5. I was specifically looking for the "Form 4 Order" that Judge Early claimed he filed regarding his ruling against the Omnibus Motions heard on August 20, 2014, in a hearing which I attended.
- 6. I could not find any documentation regarding the "Form 4 Order" and/or reason for dismissing the Omnibus motions that Judge Early stated he filed with the Richland County Clerk of Court's Office on September 9, 2014.
7. In order to make certain that I did not miss anything in the file I sought the help of Ms. Gloria Tribble, Administrative Deputy Clerk. Along with the assistance of Ms. Tribble, I was able to confirm that the Form 4 Order was both the correct document filed by Judge Early dismissing the Omnibus Motions and there was no required documentation as to legal rationale despite the affirmation such was attached on the "Form 4 Order" itself.
8. I have attached to this Affidavit the "Form 4 Order" related to the dismissal of the Omnibus Motions in this proceeding.
9. This "Form 4 Order" does not have any attachment of explanation with it as to the reasons for the dismissal of the Omnibus Motions despite the box checked indicating that it does. I have initialed the attached document.

RHW

- 10. As of the date of this affidavit, based on a search of the files, there still is no explanation formal or informal in the Clerk of Court's case file as to the reasons for the dismissal of the Omnibus Motions heard before Judge Early on August 20, 2014.
- 11. The signed statement attached, which I have initialed, I obtained from Ms. Tribble on September 29, 2014, which confirms my findings.
- 12. While searching in the Clerk of Court's Office on September 29, 2014, I could find no record, nor could Ms. Tribble find any record of the voiding of the *ex parte* Order executed on June 23, 2014 that Judge Early claimed he had sent to the Richland County Clerk of Court's Office.
- 13. As of the date of this affidavit based on my exhaustive search of the Richland County Clerk of Court's office file on this case there is still no documentation in the file validating that the Order issued by the Judge Early and Plaintiff's counsel Desa Ballard on June 23, 2014, was ever withdrawn in this case.
- 14. I did find an executed Supplemental Order which states Judge Early stands by the *ex parte* Order he issued on June 23, 2014, also attached and referenced by Gloria Tribble hereto.

AFFIANT FURTHER SAYETH NAUGHT

Affiant: 
Robert Wadley

Date: 10/24/2014

Sworn and subscribed to before me

this 29 day of October, 2014


Notary Public for South Carolina

<p>GAYLE RABON Notary Public - State of South Carolina My Commission Expires February 26, 2017</p>

My Commission expires on:

RHW

Monday, September 29, 2014

4

The Only Document provided to the Court regarding the Order ruling against the Omnibus Motion is the attached Form 4 which I have also initialed, dated and certified stamped.

My name is Gloria Tribble, Admin. Deputy Clerk and we don't have the Supplemental Order that you're requesting 08-6656; it's possible that the Order is on the Judge's Desk. If you have any questions I be contact @ 803-576-1952

Gloria Tribble

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

CASE NUMBER: 2008CP4006656

John R Rakowsky

Southern Holdings Inc

Law Max Legal Finance

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: _____

Attorney for : Plaintiff Defendant or Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
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 - 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 INFORMATION

This order ends does not end the case.

Additional Information for the Clerk : _____

INFORMATION FOR THE PUBLIC INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled
		\$
		\$
		\$

If applicable, describe the property, including tax map information and address, referenced in the order: _____

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge _____ Judge Code _____ Date _____

For Clerk of Court Office Use Only

This judgment was entered on the _____ day of _____, 20 _____ and a copy mailed first class or placed in the appropriate attorney's box on this 18 September 2014 to attorneys of record or to parties (when appearing pro se) as follows:

Desa Ballard

Ernest H Morton Jr
Andrew F. Lindemann
James Brian Spencer
Irene Santacroce

Linda Wilamson Lawrence
Adrian Lee Falgione
Rodney Keith Lail
James Brian Spencer

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Court Reporter _____

Clerk of Court Jeanette W. McBride

RHW

John R Rakowsky vs Southern Holdings Inc , defendant, et al					
Case Number:	2008CP4006656	Court Agency:	Richland County Common Pleas	Filed Date:	09/12/2008
Case Type:	Common Pleas	Case Sub Type:	Special-Comp/Oth 699	File Type:	Non-Jury
Status:	Appeal	Assigned Judge:	Early, Doyet A. III		
Disposition:	Other / Circuit Civil	Disposition Date:	12/23/2014	Disposition Judge:	Early, Doyet A. III
Original Source Doc:		Original Case #:		Restore Reason:	Reopened Case
Judgment Number:		Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Rakowsky, John R	SC Court of Appeals Order Partial Remittitur	Order		08/05/2015-14:18		
Spencer, James	Filing/Notice of Appeal	Filing		02/20/2015-10:09		
Rakowsky, John R	Certificate Of Service	Filing		12/29/2014-16:47	12/23/2014-16:47	
Rakowsky, John R	Final Order GRANTING Interpleader and Related Relief	Order		12/23/2014-10:07		
Rakowsky, John R	Order/Order Filing Fee	Filing		12/23/2014-09:57	12/23/2014-09:57	
Rakowsky, John R	Submission by Plaintiff	Filing		12/02/2014-14:09	12/23/2014-14:09	
Rakowsky, John R	Affidavit Of Service on James Spencer	Filing		11/13/2014-11:16	12/23/2014-11:16	
Rakowsky, John R	Submission by Plaintiff	Filing		11/13/2014-11:15	12/23/2014-11:15	
Spencer, James	Response in Opposition to Government Defendants and Plaintiff	Filing		11/07/2014-16:45	12/23/2014-16:45	
Spencer, James	Response to Plaintiffs Draft Order With Exhibits and Attache	Filing		10/31/2014-15:50	12/23/2014-15:50	
Spencer, James	Response to Plaintiffs Draft Order and Attached Suggested Or	Filing		10/30/2014-14:35	12/23/2014-14:35	
Santacroce, Irene	Amended Response to Plaintiffs Proposed Order With Attached	Filing		10/30/2014-10:12	12/23/2014-10:12	
Spencer, James	Judicial Notice to The Court and Request For The Interventio	Filing		10/27/2014-15:14	12/23/2014-15:14	
Spencer, James	Response to Plaintiffs Draft Order Regarding The Above Capti	Filing		10/27/2014-15:10	12/23/2014-15:10	
Lail, Rodney Keith	Request For Clarification by Judge Early	Filing		10/06/2014-09:24	12/23/2014-09:24	
Spencer, James	Clarification Questions Requested by Judge Early	Filing		10/03/2014-14:43	12/23/2014-14:43	
Rakowsky, John R	Amended Certificate of Service	Filing		09/23/2014-14:09	12/23/2014-14:09	
Santacroce, Irene	Filing/Notice of Appeal	Filing		09/19/2014-13:43	12/23/2014-13:43	
Rakowsky, John R	Form 4 Order Defendant's Omnibus Emergency Motions including	Order		09/11/2014-09:47	12/23/2014-09:47	
Rakowsky, John R	Supplemental Order	Order		09/11/2014-09:32	12/23/2014-09:32	
Santacroce, Irene	Response to Email From Judge Early	Filing		08/29/2014-14:50	12/23/2014-14:50	
Spencer, James	Correction of Obvious Typographical Error	Filing		08/29/2014-14:34	12/23/2014-14:34	
Rakowsky, John R	Certificate Of Service	Filing		08/28/2014-11:07	12/23/2014-11:07	
Holt, Doris	Response to Return For Omnibus Motion	Filing		08/26/2014-09:25	12/23/2014-09:25	

Holt, Doris	Response to Notice of Motion to Dismiss or to Substitute Par	Filing		08/26/2014-09:24	12/23/2014-09:24
Spencer, James	Response to Email From Judge Early and Requested Proposed Or	Filing		08/25/2014-11:37	12/23/2014-11:37
Rakowsky, John R	Amended Plaintiffs Response to "Omnibus" Motions	Filing		08/21/2014-14:35	12/23/2014-14:35
Falgione, Adrian L	Motion to Dismiss or Substitute Party	Motion		08/20/2014-16:35	08/20/2014-16:35
Falgione, Adrian L	The Law Offices of Adrian Falgione LLC's Return to Omnibus M	Filing		08/20/2014-16:01	12/23/2014-16:01
Rakowsky, John R	Motion/Motion Filing Fee	Filing		08/20/2014-13:19	12/23/2014-13:19
Rakowsky, John R	Service/Certificate Of Service	Filing		08/20/2014-08:52	12/23/2014-08:52
Rakowsky, John R	Response to "Omnibus" Motions	Filing		08/19/2014-09:51	12/23/2014-09:51
Spencer, James	Response to Plaintiffs Brief and Motion	Filing		08/18/2014-08:47	12/23/2014-08:47
Spencer, James	Response to Email From Judge Early	Filing		08/15/2014-09:57	12/23/2014-09:57
Rakowsky, John R	Motion/Motion Filing Fee	Filing		07/29/2014-13:42	12/23/2014-13:42
Rakowsky, John R	Motion/Motion Filing Fee	Filing		07/29/2014-13:41	12/23/2014-13:41
Spencer, James	Omnibus Emergency Motions Including Motion to Compel	Motion		07/29/2014-08:52	07/29/2014-08:52
Santacroce, Irene	Omnibus Emergency Motions Including Motion to Compel	Motion		07/29/2014-08:47	07/29/2014-08:47
Rakowsky, John R	Motion For Equitable Indemnification	Motion		07/28/2014-16:36	07/28/2014-16:36
Rakowsky, John R	Brief in Support of Interpleader and Related Relief	Filing		07/28/2014-15:41	12/23/2014-15:41
Rakowsky, John R	Motion/Motion Filing Fee	Filing		07/28/2014-11:31	12/23/2014-11:31
Rakowsky, John R	Order of Protection of Michael Sribnick	Order		07/23/2014-09:13	12/23/2014-09:13
Rakowsky, John R	Scheduling Order	Order		07/17/2014-16:14	12/23/2014-16:14
Rakowsky, John R	Certificate Of Service	Filing		07/03/2014-16:39	12/23/2014-16:39
Rakowsky, John R	Order GRANTING Partial Relief	Order		06/27/2014-09:36	12/23/2014-09:36
Spencer, James	Response to Attached Email Litigation	Filing		06/25/2014-09:20	12/23/2014-09:20
Rakowsky, John R	Affidavit of Mara T. Ballard, CFE, CMA	Filing		05/28/2014-11:58	12/23/2014-11:58
Rakowsky, John R	Affidavit of John Rakowsky	Filing		05/28/2014-11:58	12/23/2014-11:58
Spencer, James	Declaration of James Spencer	Filing		05/28/2014-09:34	12/23/2014-09:34
Holt, Doris	Comments on Discovery in Response to Questions From Law Cler	Filing		05/27/2014-16:20	12/23/2014-16:20
Rakowsky, John R	Order of Protection of Andrew Lindemann	Order		05/15/2014-11:40	12/23/2014-11:40
Rakowsky, John R	Motion/Motion Filing Fee	Filing		05/12/2014-12:32	12/23/2014-12:32
Santacroce, Irene	Emergency Motion For Clarification and Production	Motion		05/12/2014-16:42	05/12/2014-16:42
Falgione, Adrian L	Affidavit of Adrian L. Falgione	Filing		04/15/2014-10:13	12/23/2014-10:13
Falgione, Adrian L	Notice of Appearance	Filing		03/04/2014-14:17	12/23/2014-14:17

Rakowsky, John R	Proof Of Service On Adrian Falgione By Mail	Filing		02/25/2014-16:07	12/23/2014-16:07
Rakowsky, John R	Proof Of Service On Mara Ballard By Hand Delivered	Filing		02/25/2014-16:05	12/23/2014-16:05
Rakowsky, John R	Proof Of Service On Desa Ballard By Mail	Filing		02/25/2014-16:02	12/23/2014-16:02
Rakowsky, John R	Proof Of Service On Adrian Falgione By Hand	Filing		02/25/2014-15:59	12/23/2014-15:59
Falgione, Adrian L	Notice of Appearance	Filing		02/25/2014-15:33	12/23/2014-15:33
Rakowsky, John R	Motion/Motion Filing Fee	Filing		02/25/2014-13:41	12/23/2014-13:41
Falgione, Adrian L	Motion to Quash	Motion		02/25/2014-15:32	02/25/2014-15:32
Spencer, James	Response to Plaintiffs Memorandum in Opposition to Motions	Filing		02/11/2014-10:50	12/23/2014-10:50
Rakowsky, John R	Memorandum in Opposition to Motions	Filing		02/06/2014-16:19	12/23/2014-16:19
Santacroce, Irene	Objections to Plaintiff Rakowskys Claim Against Interpled F	Filing		01/30/2014-16:37	12/23/2014-16:37
Spencer, James	Request For Outstanding Motions and Memorandum on Motions an	Filing		01/27/2014-16:51	12/23/2014-16:51
Rakowsky, John R	Certificate Of Service By Mail	Filing		01/14/2014-11:17	12/23/2014-11:17
Rakowsky, John R	Order Case Assigned to Judge Early	Order		01/13/2014-14:51	12/23/2014-14:51
Rakowsky, John R	Form 4 Order this case be assigned to the Honorable Doyet A.	Order		12/17/2013-15:54	12/23/2014-15:54
Rakowsky, John R	Claim Against Interpled Funds	Filing		12/12/2013-14:49	12/23/2014-14:49
Santacroce, Irene	Notice of Appearance	Filing		12/09/2013-10:13	12/23/2014-10:13
Santacroce, Irene	Motion for Continuance	Motion		12/09/2013-10:09	12/23/2014-10:09
Rakowsky, John R	Motion/Motion Filing Fee	Filing		12/09/2013-09:50	12/23/2014-09:50
Santacroce, Irene	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Stephens, Ricky	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Stephens, Marguerite	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Green, Dan	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
McKeown, Deborah Stroud	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Falgione, Adrian Lee	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Spencer, James Brian	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Lail, Rodney Keith	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Ballard, Desa	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		11/13/2013-15:03	12/23/2014-15:03
Rakowsky, John R	Order of Protection of Andrew Linemann	Order		10/30/2013-12:21	12/23/2014-12:21
Rakowsky, John R	Order and Motion to Quash Subpoena	Order		07/02/2013-11:57	12/23/2014-11:57
Rakowsky, John R	Motion to Quash Subpoena	Motion		06/05/2013-10:58	07/01/2013-10:58

Rakowsky, John R	SC Court of Appeals Order dismissing appeal	Order		07/24/2012-15:42	12/23/2014-15:42	
Rakowsky, John R	Form Order Discovery request by Defendant is DENIED. Defend	Order		07/19/2012-14:34	12/23/2014-14:34	
Rakowsky, John R	Order Denying Motion to Compel	Order		07/19/2012-10:20	12/23/2014-10:20	
Green, Dan	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		06/29/2012-09:17	12/23/2014-09:17	
Rakowsky, John R	Form Order No One Appeared for hearing on 2 pending motions	Order		05/09/2012-10:28	12/23/2014-10:28	
Rakowsky, John R	Motion/Motion Filing Fee	Filing		05/01/2012-14:29	12/23/2014-14:29	
Santacroce, Irene	Certificate of Service	Filing		05/01/2012-11:56	12/23/2014-11:56	
Santacroce, Irene	Interrogatories	Filing		05/01/2012-11:55	12/23/2014-11:55	
Santacroce, Irene	Motion to Compel	Motion		05/01/2012-11:55	05/01/2012-11:55	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Green, Dan	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Green, Dan	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	

Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		04/10/2012-09:01	12/23/2014-09:01	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Green, Dan	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Green, Dan	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		03/13/2012-08:58	12/23/2014-08:58	

Rakowsky, John R	Form Order Motion for Sanctions is Continued. Entire matter	Order		01/20/2012-11:54	12/23/2014-11:54	
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Green, Dan	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		12/29/2011-14:49	12/23/2014-14:49	
Rakowsky, John R	Motion/Motion Filing Fee	Filing		12/20/2011-16:23	12/23/2014-16:23	
Stephens, Marguerite	Motion for Sanctions	Motion		12/20/2011-11:27	12/20/2011-11:27	
Rakowsky, John R	Order to Substitute Real Party of Interest	Order		12/02/2011-09:45	12/23/2014-09:45	
Green, Dan	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		10/21/2011-10:20	12/23/2014-10:20	
Rakowsky, John R	Order Denying Motion to Compel, Substituting Parties, Release	Order		10/18/2011-16:29	12/23/2014-16:29	
Rakowsky, John R	Order Defendant's Motion to Alter or Amend DENIED.	Order		09/30/2011-10:38	12/23/2014-10:38	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25	
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25	
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25	

Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Green, Dan	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		09/29/2011-15:25	12/23/2014-15:25
Rakowsky, John R	Motion/Motion Filing Fee	Filing		09/07/2011-15:45	12/23/2014-15:45
Falgione, Adrian L	Motion to Substitute Real Part of Interest	Motion		09/07/2011-11:11	09/07/2011-11:11
Rakowsky, John R	Motion/Motion Filing Fee	Filing		08/30/2011-14:31	12/23/2014-14:31
Spencer, James	Corrected Motion to Amend Answer	Motion		08/30/2011-15:33	08/30/2011-15:33
Rakowsky, John R	Motion/Motion Filing Fee	Filing		08/29/2011-15:57	12/23/2014-15:57
Spencer, James	Amended Response and Counter claims in Response to John Rako	Filing		08/29/2011-11:13	12/23/2014-11:13
Spencer, James	Motion to Amend Answer	Motion		08/29/2011-11:01	08/29/2011-11:01
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Stephens, Marguerite	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Green, Dan	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Santacroce, Irene	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Stephens, Ricky	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Spencer, James Brian	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Lail, Rodney Keith	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		08/26/2011-09:11	12/23/2014-09:11
Spencer, James	Omnibus Consent to Plaintiff's May 6, 2011 Motion and Order	Filing		08/23/2011-09:45	12/23/2014-09:45
Rakowsky, John R	Motion/Motion Filing Fee	Filing		08/22/2011-16:32	12/23/2014-16:32
Spencer, James	Motion to Alter or Amend the Court Order Issued on August 3,	Motion		08/22/2011-11:06	08/22/2011-11:06
Rakowsky, John R	Certificate of Service	Filing		08/10/2011-11:18	12/23/2014-11:18
Rakowsky, John R	Order Plaintiff's Motion to Strike and to File Under Seal DE	Order		08/03/2011-09:41	12/23/2014-09:41
Spencer, James	Certificate of Service	Filing		07/14/2011-16:16	12/23/2014-16:16
Rakowsky, John R	Motion/Motion Filing Fee	Filing		07/14/2011-11:43	12/23/2014-11:43

Spencer, James	Expedited Motion to Compel Defendants Request for Production	Motion		07/14/2011-16:14	07/14/2011-16:14	
Rakowsky, John R	Certificate of Service	Filing		07/12/2011-10:17	12/23/2014-10:17	
Rakowsky, John R	Affidavit of Default	Filing		07/12/2011-10:17	12/23/2014-10:17	
Rakowsky, John R	Order for Default Judgment as to Southern Holding Inc., Ltf	Order		07/12/2011-10:14	12/23/2014-10:14	
Rakowsky, John R	Form Order Motions Under Advisement: Formal Order to Follow	Order		07/12/2011-11:02	07/12/2011-11:02	
Rakowsky, John R	Order/Order Filing Fee	Filing		07/12/2011-08:29	07/12/2011-08:29	
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		06/30/2011-17:10	07/12/2011-17:10	
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		06/30/2011-17:10	07/12/2011-17:10	
Ballard, Desa	Notice of Case Roster Publication Sent	Action		06/30/2011-17:10	07/12/2011-17:10	
Falgione, Adrian Lee	Notice of Case Roster Publication Sent	Action		06/30/2011-17:10	07/12/2011-17:10	
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		06/30/2011-17:10	07/12/2011-17:10	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Falgione, Adrian Lee	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		06/24/2011-09:06	07/12/2011-09:06	
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		04/21/2011-14:41	07/12/2011-14:41	
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		04/21/2011-14:41	07/12/2011-14:41	
Ballard, Desa	Notice of Case Roster Publication Sent	Action		04/21/2011-14:41	07/12/2011-14:41	
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		04/21/2011-14:41	07/12/2011-14:41	
Falgione, Adrian Lee	Notice of Case Roster Publication Sent	Action		04/21/2011-14:41	07/12/2011-14:41	

Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		04/21/2011-14:29	07/12/2011-14:29
Ballard, Desa	Notice of Case Roster Publication Sent	Action		04/21/2011-14:29	07/12/2011-14:29
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		04/21/2011-14:29	07/12/2011-14:29
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		04/21/2011-14:29	07/12/2011-14:29
Falgione, Adrian Lee	Notice of Case Roster Publication Sent	Action		04/21/2011-14:29	07/12/2011-14:29
Rakowsky, John R	Certificate of Service	Filing		03/08/2011-11:44	07/12/2011-11:44
Rakowsky, John R	Certain Pro Se Defendants' Response in Opposition of John Ra	Filing		03/08/2011-11:43	07/12/2011-11:43
Rakowsky, John R	Letter/Letter Re Return Notice	Filing		02/24/2011-13:51	07/12/2011-13:51
Rakowsky, John R	Certificate of Service	Filing		02/24/2011-09:44	07/12/2011-09:44
Rakowsky, John R	Plaintiff's Motion to Strike and to File Under Seal	Motion		02/24/2011-09:43	07/12/2011-09:43
Rakowsky, John R	Motion/Motion Filing Fee	Filing		02/24/2011-09:43	07/12/2011-09:43
Rakowsky, John R	Motion/Motion Filing Fee	Filing		02/23/2011-15:11	07/12/2011-15:11
Falgione, Adrian L	Motion to Quash Subpoena	Motion		02/23/2011-10:04	07/12/2011-10:04
Rakowsky, John R	Certificate of Service	Filing		02/22/2011-14:06	07/12/2011-14:06
Rakowsky, John R	Plaintiff's Motion to Quash Subpoena	Motion		02/22/2011-14:02	07/12/2011-14:02
Rakowsky, John R	Motion/Motion Filing Fee	Filing		02/22/2011-11:27	07/12/2011-11:27
Rakowsky, John R	Motion/Motion Filing Fee	Filing		02/18/2011-14:43	07/12/2011-14:43
Rakowsky, John R	Certificate of Service	Filing		02/18/2011-13:50	07/12/2011-13:50
Rakowsky, John R	Reply to Counterclaims to Second Amended Complaint for Inter	Filing		02/18/2011-13:48	07/12/2011-13:48
Rakowsky, John R	Certificate of Service	Filing		01/18/2011-13:14	07/12/2011-13:14
Rakowsky, John R	Certain Defendants Response to John Rakowsky's Second Amende	Filing		01/18/2011-13:11	07/12/2011-13:11
Rakowsky, John R	Certificate of Service	Filing		01/04/2011-14:51	07/12/2011-14:51
Rakowsky, John R	Answer to Second Amended Complaint of Defendant Horry County	Filing		01/04/2011-14:50	07/12/2011-14:50
Rakowsky, John R	Service/Certificate Of Service	Filing		12/30/2010-11:18	07/12/2011-11:18
Rakowsky, John R	Service/Certificate Of Service	Filing		12/30/2010-11:17	07/12/2011-11:17
Rakowsky, John R	Answer of Defendant	Filing		12/28/2010-09:58	07/12/2011-09:58
Rakowsky, John R	Service/Certificate Of Service	Filing		12/17/2010-09:38	07/12/2011-09:38
Rakowsky, John R	Second Amended Complaint for Interpleader	Filing		12/03/2010-09:40	07/12/2011-09:40
Rakowsky, John R	Second Amended Summons	Filing		12/03/2010-09:37	07/12/2011-09:37
Rakowsky, John R	Order GRANTING Motion to Amend Complaint	Order		11/15/2010-10:20	07/12/2011-10:20
Rakowsky, John R	Form Order - Motion to amend is GRANTED. Appearing Counsel	Order		11/04/2010-10:39	07/12/2011-10:39
Rakowsky, John R	Service/Certificate Of Service Certified Mail	Filing		10/19/2010-12:00	07/12/2011-12:00
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		10/06/2010-16:29	07/12/2011-16:29
Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		10/06/2010-16:29	07/12/2011-16:29

Ballard, Desa	Notice of Motions Roster Publication Sent	Action		10/06/2010-16:29	07/12/2011-16:29	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		10/06/2010-16:29	07/12/2011-16:29	
Rakowsky, John R	Certificate Of Service by Mail on Andrew F Lindemann; James	Filing		08/11/2010-14:42	07/12/2011-14:42	
Rakowsky, John R	Certificate/Certificate Of Service	Filing		08/02/2010-10:56	07/12/2011-10:56	
Rakowsky, John R	Motion/Motion Filing Fee	Filing		07/28/2010-16:35	07/12/2011-16:35	
Rakowsky, John R	Motion/Motion Filing Fee	Filing		07/28/2010-16:35	07/12/2011-16:35	
Rakowsky, John R	Affidavit of Default	Filing		07/28/2010-15:55	07/12/2011-15:55	
Rakowsky, John R	Second Amended Complaint for Interpleader	Filing		07/28/2010-15:48	07/12/2011-15:48	
Falgione, Adrian L	Summons to Second Amended Complaint for Interpleader	Filing		07/28/2010-15:34	07/12/2011-15:34	
Rakowsky, John R	Motion for Continuance	Motion		07/28/2010-14:57	09/15/2010-14:57	
Rakowsky, John R	Motion to Amend Complaint	Motion		07/28/2010-14:42	10/27/2010-14:42	
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		07/20/2010-15:37	07/12/2011-15:37	
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		07/20/2010-15:37	07/12/2011-15:37	
Ballard, Desa	Notice of Case Roster Publication Sent	Action		07/20/2010-15:37	07/12/2011-15:37	
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		07/20/2010-15:37	07/12/2011-15:37	
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		07/20/2010-15:36	07/12/2011-15:36	
Ballard, Desa	Notice of Case Roster Publication Sent	Action		07/20/2010-15:36	07/12/2011-15:36	
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		07/20/2010-15:36	07/12/2011-15:36	
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		07/20/2010-15:36	07/12/2011-15:36	
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		07/20/2010-15:26	07/12/2011-15:26	
Ballard, Desa	Notice of Case Roster Publication Sent	Action		07/20/2010-15:26	07/12/2011-15:26	
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		07/20/2010-15:26	07/12/2011-15:26	
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		07/20/2010-15:26	07/12/2011-15:26	
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		07/20/2010-14:55	07/12/2011-14:55	
Ballard, Desa	Notice of Case Roster Publication Sent	Action		07/20/2010-14:55	07/12/2011-14:55	
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		07/20/2010-14:55	07/12/2011-14:55	
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		07/20/2010-14:55	07/12/2011-14:55	
Rakowsky, John R	Form Order Motion to Deposit Money with the Clerk of Court i	Order		05/19/2010-09:41	07/12/2011-09:41	
Rakowsky, John R	Certificate of Service	Filing		02/10/2010-11:15	07/12/2011-11:15	
Rakowsky, John R	Answer to Amended Complaint of Defendant Horry County	Filing		02/10/2010-11:14	07/12/2011-11:14	
Morton, Ernest H Jr	Notice of Motions Roster Publication Sent	Action		01/04/2010-13:46	07/12/2011-13:46	
Ballard, Desa	Notice of Motions Roster Publication Sent	Action		01/04/2010-13:46	07/12/2011-13:46	

Lindemann, Andrew F.	Notice of Motions Roster Publication Sent	Action		01/04/2010-13:46	07/12/2011-13:46
Lawrence, Linda Wilamson	Notice of Motions Roster Publication Sent	Action		01/04/2010-13:46	07/12/2011-13:46
Rakowsky, John R	Consent Order for Substitution of Counsel J/Barber	Order		11/05/2009-14:43	07/12/2011-14:43
Rakowsky, John R	Certificate/Certificate of Service	Filing		11/05/2009-14:43	07/12/2011-14:43
Rakowsky, John R	Order/Order Filing Fee	Filing		11/04/2009-10:45	07/12/2011-10:45
Lawrence, Linda Wilamson	Notice of Case Roster Publication Sent	Action		07/16/2009-09:34	07/12/2011-09:34
Powers, Hailey	Notice of Case Roster Publication Sent	Action		07/16/2009-09:34	07/12/2011-09:34
Morton, Ernest H Jr	Notice of Case Roster Publication Sent	Action		07/16/2009-09:34	07/12/2011-09:34
Lindemann, Andrew F.	Notice of Case Roster Publication Sent	Action		07/16/2009-09:34	07/12/2011-09:34
Rakowsky, John R	Motion to Dismiss and Motion to Strike	Event		05/20/2009-15:30	05/05/2009-17:00
Rakowsky, John R	Letter/Letter Enclosed for the Courts information are docume	Filing		02/09/2009-12:52	07/12/2011-12:52
Rakowsky, John R	Service/Affidavit Of Service onHarold Hartness	Filing		02/09/2009-08:40	07/12/2011-08:40
Rakowsky, John R	Amended/Amended Summons	Filing		12/29/2008-10:12	07/12/2011-10:12
Falgione, Adrian L	Service/Certificate Of Service	Filing		11/17/2008-17:26	07/12/2011-17:26
Falgione, Adrian L	Amended/Amended Complaint for Interpleader	Filing		11/17/2008-17:26	07/12/2011-17:26
Rakowsky, John R	Certificate/Certificate Of Service	Filing		10/21/2008-08:02	07/12/2011-08:02
Rakowsky, John R	Answer/Answer Of Defendant Horry County	Filing		10/21/2008-08:02	07/12/2011-08:02
Rakowsky, John R	Other Certain Defendants Response To John Rakowskys	Filing		10/20/2008-13:55	07/12/2011-13:55
Rakowsky, John R	Other Certain Defendants Motion For Court To Order The Immed	Filing		10/20/2008-12:54	07/12/2011-12:54
Rakowsky, John R	Order/Order Filing Fee	Filing		10/20/2008-09:17	07/12/2011-09:17
Rakowsky, John R	Order/Order Filing Fee	Filing		10/20/2008-09:14	07/12/2011-09:14
Rakowsky, John R	Certificate/Certificate Of Service	Filing		10/20/2008-09:12	07/12/2011-09:12
Rakowsky, John R	Affidavit/Affidavit	Filing		10/20/2008-09:11	07/12/2011-09:11
Rakowsky, John R	Motion to Strike	Motion		10/20/2008-09:11	02/01/2010-09:11
Rakowsky, John R	Affidavit	Filing		10/20/2008-09:04	07/12/2011-09:04
Rakowsky, John R	Motion to Dismiss Lawrence	Filing		10/20/2008-09:03	07/12/2011-09:03
Rakowsky, John R	Order Dismissing Linda Williamson Lawrence J/Manning	Order		10/20/2008-09:03	07/12/2011-09:03
Rakowsky, John R	Certificate/Certificate Of Service	Filing		10/16/2008-08:38	07/12/2011-08:38
Rakowsky, John R	Answer/Answer Of Linda Williamson Lawrence Defendant	Filing		10/16/2008-08:38	07/12/2011-08:38
Rakowsky, John R	Certificate/Certificate Of Service	Filing		10/14/2008-12:46	07/12/2011-12:46
Rakowsky, John R	Answer/Answer Of Ernest H Morton Jr Defendant To Complaitn F	Filing		10/14/2008-12:46	07/12/2011-12:46
Rakowsky, John R	Verification/Verified	Filing		09/16/2008-15:16	07/12/2011-15:16

Rakowsky, John R	ADR/Alternative Dispute Resolution (Workflow)	Action		09/15/2008-13:04	07/12/2011-13:04	
Rakowsky, John R	Summons & Complaint	Filing		09/15/2008-13:01	10/14/2008-13:01	

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

JUDGMENT A CIVIL CASE

CASE NO. 2008 CP-40-6556

John Rakowsky

Adrian Falgione, James Spencer, et al.

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:	Attorney for : <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant
	or <input type="checkbox"/> Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. See Page 2 for additional information.
- 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

2014 SEP 11 PM 12:01
 RICHLAND COUNTY
 FILED
 JEREMY S. STONER
 CLERK OF COURT

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

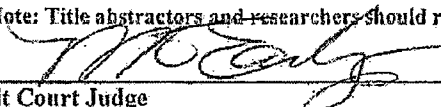
IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court: Defendant's Omnibus Emergency Motions including Motion to Compel Dated July 29, 2014 and heard on August 20, 2014, is DENIED.

ORDER INFORMATION

This order ends does not end the case.
Additional Information for the Clerk : _____

INFORMATION FOR THE JUDGMENT INDEX		
Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.		
Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
		\$
		\$
		\$
If applicable, describe the property, including tax map information and address, referenced in the order:		

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.


 _____ 0136 9/10/14
 Circuit Court Judge Judge Code Date

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

EXHIBIT "D"

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

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

APPELLATE CASE NO. 2014-002029

John R. Rakowsky, *Respondent*

v.

Irene Santacroce, *Appellant*
Rodney Lail, *Appellant*
Estate of Doris Holt, *Appellant*

and

James Spencer, *Pro Se, Appellant*

AFFIDAVIT OF JAMES SPENCER

AFFIDAVIT OF JAMES SPENCER

PERSONALLY APPEARED before me the undersigned James Spencer who after being duly sworn states the following:

1. I am over eighteen years of age and qualified to testify.
2. The information in this affidavit is based on my personal knowledge.
3. I had no idea that the Plaintiff filed a Reply to Counterclaims of the Defendants on November 18, 2011 because we simply had not filed Counterclaims at any point in time up to and including November 18, 2011.
4. Furthermore, I and to my knowledge none of the other Appellants ever received a Reply to Counterclaims dated November 18, 2011 from the Plaintiff/Respondent.

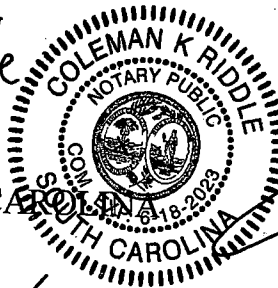
AFFIANT FURTHER SAYETH NAUGHT

SIGNATURE ON FOLLOWING PAGE

Signature James B. Spencer

SUBSCRIBED AND SWORN TO before me this 28th day of March, 2016,

by Coleman K. Riddle



State of South Carolina County of Richland
 Subscribed and sworn before me on 06/18/2023 (Date)
[Signature]
 (Notary Signature)

NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 06/18/2023

CERTIFICATE OF SERVICE

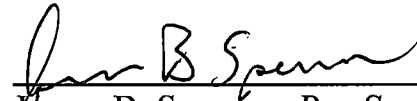
The undersigned hereby certifies that on March 28, 2016, the document described below, was(were) served on all parties of record in this case by mailing a copy, by US mail or by courier.

Documents Served: **RESPONSE TO REPLY TO CLARIFY THE RECORD**

Parties Served:

Desa Ballard, Esquire
Ballard and Watson, Attorneys at Law
PO Box 6338
West Columbia, SC 29171

RECEIVED
MAR 28 2016
SC Court of Appeals



James B. Spencer, *Pro Se*
Suite 183
7001 Saint Andrews Road
Columbia, SC 29212