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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Charles B. Simmons, Jr., Master-in-Equity/Clerk

Common Pleas Case No.: 2014-CP-23-01871
Appellate Case No.: 2016-1787

China Construction America of South Carolina, Inc.....Appellant/Respondent,

vs.

MS Production Solutions LLC a/k/a MSPS Steel Fabricators, Manfred Sprenger and
Patricia Sprenger Respondents/Appellants.

**AMENDED RECORD ON APPEAL
VOLUME II**

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1 (Mortgage, Security Agreement for the Small Business Loan
2 Source, LLC, certified copy entered into evidence as Defendant's
3 Exhibit No. 2)

4 Q Mr. Sprenger, I'm going to show you what's been marked as
5 Defendant's Exhibit No. 3. Is that the UCC Statement?

6 A That's correct.

7 Q Financing Statement?

8 A That's correct.

9 Q At the very bottom I've highlighted what the bank has a
10 security interest in. Can you read that for me, please?

11 A The whole paragraph?

12 Q Yes, sir.

13 A "All of the business personal property of the debtor at or
14 arising out of the following location, or wherever located
15 including without limitation all accounts, chattel paper,
16 inventory, equipment, instruments, investment property,
17 documents, deposit accounts, letter of credit rights, general
18 intangibles, furniture, building materials and fixtures at or
19 arising out of that location, whether any of the foregoing is
20 owned now or acquired later; all accessions, additions,
21 replacements and substitutions relating to any of the foregoing:
22 all records of any kind relating to the foregoing: all proceeds
23 relating to any of the foregoing (including insurance, lawsuits,
24 general intangibles, and account proceeds) and all remedies or
25 claims with respect to any thereof."

MANFRED SPRENGER-DIRECT BY MR. BURNEY

1 MR. BURNEY: Your Honor, I would move at this time to
2 introduce Defendant's Exhibit No. 3.

3 BY THE COURT: All right.

4 (UCC Financing Statement entered into evidence as
5 Defendant's Exhibit No. 3)

6 Q Mr. Sprenger, I'm going to show you Defendant's Exhibit 4,
7 5, 6 and 7. As far as 6 and 7, are those the personal Guaranties
8 signed by you and your wife in order to get this loan from the
9 SBA?

10 A Yes, sir.

11 Q You understand how a personal Guarantee works?

12 A Yes, sir.

13 Q How does it work?

14 A If left unpaid, the Small Business loan, it would be all of
15 my personal property in jeopardy.

16 Q So, the bank required you and your wife to give a personal
17 Guarantee in order for extra backing of this loan?

18 A That's correct.

19 Q And Exhibit No. 5, is that the note to the United States
20 Small Business Administration?

21 A That's correct, yes.

22 Q And that is dated August of 2007?

23 A That's correct.

24 MR. BURNEY: Your Honor, I would move at this time to
25 introduce Defendant's Exhibits 4, 5, 6, and 7.

1 BY THE COURT: All right. Thank you, sir.

2 (Guaranty Agreement of Patricia Sprenger entered into
3 evidence as Defendant's Exhibit No. 4)

4 (Small Business Administration Note entered into evidence as
5 Defendant's Exhibit No. 5)

6 (Guaranty Agreement of Manfred Sprenger entered into
7 evidence as Defendant's Exhibit No. 6)

8 (Small Business Administration Unconditional Limited
9 Guarantee entered into evidence as Defendant's Exhibit No. 7)

10 Q Now, when did MS Productions get involved with China
11 Construction?

12 A The contract -- I go by memory now, I don't have it in front
13 of me -- but the contract, as far as I recall, was signed
14 December 22, 2012.

15 Q When did you start doing work for China Construction?

16 A Right about the, in the new year of 2013, right immediately
17 because the project was already late.

18 Q Let's get to payments to your wife, Patricia. She's here
19 with us today?

20 A Yes, sir.

21 Q Now, MS Productions has made payments to your wife; is that
22 correct?

23 A That's correct.

24 Q During the time that MS Productions was making payments to
25 your wife was it also making payments to you?

1 A No, sir.

2 Q Why is that?

3 A Well, now I guess I get to embarrass myself, I was just too
4 lazy to go to the bank and get the money -- deposit the money
5 myself. So, for me it was just easier to write the check
6 directly to her and she brought it to the bank. It was our
7 personal joint checking account.

8 Q How long was your company writing checks to Patricia rather
9 than to you?

10 A Well, I wrote the checks from the beginning of the business
11 in 2007 to myself, probably around -- I went back and looked --
12 September of 2011.

13 Q Let me show you what has been marked as Defendant's Exhibit
14 No. 8 and 9. Are these the documents provided by your CPA to the
15 subpoena issued by China?

16 A Yeah.

17 Q Is this the ledger from your company?

18 A Yes, sir.

19 Q Now, Defendant's Exhibit No. 8 is that the ledger for the
20 year of 2012?

21 A Yes.

22 Q And Exhibit No. 9 is that the ledger for December -- excuse
23 me -- through the year of 2013?

24 A That's correct.

25 Q These documents were kept in the course of your business?

MANFRED SPRENGER-DIRECT BY MR. BURNEY

1 A Yes, sir.

2 MR. BURNEY: Your Honor, I would move at this time to
3 introduce Defendant's Exhibit Nos. 8 and 9.

4 BY THE COURT: All right. Thank you.

5 (General Ledger for MSPS as of December 31, 2012 entered
6 into evidence as Defendant's Exhibit No. 8)

7 (General Ledger for MSPS as of December 31, 2013 entered
8 into evidence as Defendant's Exhibit No. 9)

9 Q And we've highlighted those checks written to Patricia in
10 both of these exhibits. Do you see these highlights?

11 A Yes.

12 Q If we would look through both ledgers would you see any
13 checks written to Manfred Sprenger?

14 A No, none whatsoever.

15 Q Was it customary, even before you got involved with China to
16 write checks to Patricia Sprenger?

17 A Yes.

18 Q How many owners are there of MS Productions?

19 A One.

20 Q And that is you?

21 A That is me, yes.

22 Q How many employees do you have at any given time?

23 A I would say average eight, depends on the workload.

24 Q Tell the Court briefly what type of business you are in.

25 A I fabricate steel, structural steel for a building. Just

1 one example for the Court, I built the Croc Center here in town,
2 all of the steel inside the building.

3 Q So, people come to you, and builders, and contractors come
4 to your company and they need steel to make a structure?

5 A Yes, sir.

6 Q Then you go and buy steel and manufacture it to fit the
7 specifications that the structure needs?

8 A Yes, sir.

9 Q And you sell the steel to the contractor or builder?

10 A Yes, sir.

11 Q Now, is it uncommon for you to put money into your business
12 from your own personal account?

13 A No. It's not uncommon.

14 Q Why would you have to put money in from your own personal
15 account into the business?

16 A Usually when there's high cash flow due to different things;
17 when contractors don't pay, which is very common, on time and
18 stretch out the payment to me, and to keep the cash flow going
19 and to keep the payroll paying and my suppliers. They don't wait
20 for me. I have terms with them and me telling them I haven't
21 gotten paid yet won't fly with them. So, I have to put money for
22 my cash flow purpose.

23 Q Let me show you what's been marked as Defendant's Exhibit
24 No. 10 and 11. Is Defendant's Exhibit No. 10, is that a bank
25 statement from your account that you have with Patricia, your

1 wife?

2 A That's correct.

3 Q That's at First Citizens?

4 A That's correct.

5 Q Is Defendant's Exhibit No. 11 the Bank of America account
6 that your company has?

7 A That's correct.

8 MR. BURNEY: Your Honor, I would move at this time to
9 introduce Defendant's Exhibit No. 10 and 11.

10 BY THE COURT: All right.

11 (First Citizens Bank Statement entered into evidence as
12 Defendant's Exhibit No. 10)

13 (Bank of America Bank Statement entered into evidence as
14 Defendant's Exhibit No. 11)

15 Q So, both of these statements are they for the month of May
16 -- excuse me -- March of 2014 -- February through March 2015?

17 A That's correct.

18 Q The first statement shown as Defendant's Exhibit No. 10 from
19 First Citizens, on the second page does it show a check written
20 from your account, check number 1421 on February 26th in the
21 amount of \$40,000?

22 A That's correct.

23 Q And that's from your own personal account?

24 A That's correct.

25 Q If we look at Defendant's Exhibit No. 11 which is the Bank

1 of America account on the second page of that document, there was
2 \$40,000 deposited into the Bank of America account for your
3 business?

4 A Yes, sir.

5 Q So, is it your position that the money was transferred from
6 your personal account to the business account?

7 A That's correct.

8 Q Is that common or uncommon?

9 A That is common.

10 Q Let's look at the balance of that Bank of America account,
11 the business account, ending balance of that, was it \$39,380.88?

12 A Yes.

13 Q If you had not put the \$40,000 into the business account
14 that month, what would your balance have been?

15 A Negative a thousand, roughly.

16 Q Let me show you Defendant's Exhibit No. 12 and 13. Is
17 Defendant's Exhibit No. 12 a deposit slip from the Bank of
18 America for \$25,000?

19 A Yes, sir.

20 Q And if we look at Defendant's Exhibit No. 13, is that the
21 bank statement from MS Production Solutions?

22 A That's correct.

23 MR. BURNEY: Your Honor, I would move at this time to
24 introduce Defendant's Exhibit No. 12 and 13.

25 BY THE COURT: All right.

1 (Bank of America Deposit Slip entered into evidence as
2 Defendant's Exhibit No. 12)

3 (Bank of America Bank Statement for July 2015 entered into
4 evidence as Defendant's Exhibit No. 13)

5 Q And if we look at Defendant's Exhibit No. 13, do you see the
6 \$25,000 being deposited on July 15, 2015?

7 A Yes, sir.

8 Q Was that cash that was put into the business?

9 A Yes, sir.

10 Q And where did that cash come from?

11 A Famously called under the mattress.

12 Q Explain that for me. Is this cash that you kept at your
13 house?

14 A We keep cash at our house.

15 Q If we look at the balance of the company's account at Bank
16 of America as shown on Defendant's Exhibit No. 13 for the month
17 July 15 through July 31st, what is the ending balance?

18 A \$21,759 (sic).

19 Q If you had not put in the \$25,000 would your company have
20 had a negative balance?

21 A Yes, sir.

22 Q Now, do you pay yourself?

23 A Yes, I do.

24 Q What is your -- do you have a set draw or set payment that
25 you pay yourself every month?

1 A An agreement I made at the very beginning of when I
2 purchased the business, agreement with MSPS, that I should get --
3 it lies out what my duties are, and my benefits, and pay, and in
4 there it states I should get \$12,000 per month plus health
5 insurance and vacation and the whole -- whatever an employee
6 expects to get paid. The \$12,000 I can't pay myself that every
7 month or at all in the last couple of years due to the economy as
8 we all know. So, at this point it is, I think, \$7- or \$8,000,
9 \$10,000. It changes, varies.

10 Q Let me show you Defendant's Exhibit No. 14. Did you prepare
11 this?

12 A Yes, sir.

13 Q Does this show a summary of your payments throughout the
14 past couple of years from your company to you?

15 A Yes, sir.

16 Q You mentioned that you had a salary of \$12,000 a month?

17 A Yes, sir.

18 Q Have you been taking that salary of \$12,000 a month?

19 A Not lately, no.

20 Q The past couple of years approximately how much have you
21 been paying yourself monthly?

22 A Average, I would say about eight-and-a-half, \$9,000,
23 average. On average, yeah.

24 MR. BURNEY: Your Honor, I would move at this time to
25 introduce Defendant's Exhibit No. 14.

1 BY THE COURT: All right. Thank you.

2 (Summary From 2013 through 2015 entered into evidence as
3 Defendant's Exhibit No. 14)

4 Q Defendant's Exhibit No. 14 does it set out how much your
5 company should have paid you and how much you have actually been
6 paid?

7 A That's correct.

8 Q When it shows how much you have been paid, are those the
9 checks that were written to Patricia Sprenger?

10 A Those are the checks written to Patricia, yes, sir.

11 Q And have you calculated on the first page how much the
12 company actually owes to you?

13 A At this point, roughly, \$180,000.

14 Q Is that through the years 2013, '14 and '15?

15 A Yes, sir.

16 Q Is that because the months that the company did not pay you
17 a salary?

18 A That's correct.

19 Q If you look at page 2 of that document, it shows the year
20 January 2015 through December 2015, does it show the money going
21 into MS Productions from you?

22 A From me, yes, the \$40,000 we talked about earlier which I
23 put in.

24 Q Is that in the column that says "Manfred"?

25 A It says the column "Manfred to MSPS."

1 Q And then in the next column, it says payments to Manfred?

2 A Yes, sir.

3 Q It has a payment to you of \$60,000?

4 A Back in June.

5 Q That check was actually written to Patricia?

6 A Written to Patricia, yes.

7 Q It was deposited into your account?

8 A Into the First Citizens joint account, yes, sir.

9 Q What does that \$60,000 represent?

10 A That \$60,000 represents the salary payment which I haven't
11 received from January until June plus the \$40,000 I put in in
12 March which is not even enough for that to cover that.

13 Q So, does your company often play catch-up with what it
14 should have paid you but was unable to pay because it didn't have
15 the money?

16 A Yes, sir.

17 Q Let me show you Defendant's Exhibit No. 15 and 16. Is
18 Defendant's Exhibit No. 15 your joint account with your wife at
19 First Citizens?

20 A Yes, sir.

21 Q And Defendant's Exhibit 16 the Bank of America account for
22 your company?

23 A Yes, sir.

24 Q If you look at Defendant's Exhibit No. 15 does it show the
25 \$60,000 being deposited into your joint account?

1 A Yes, sir.

2 Q And Defendant's Exhibit No. 16 does it show the \$60,000
3 coming out of the business account?

4 A Yes, sir.

5 Q That's check number 54522?

6 A Yes.

7 MR. BURNEY: Your Honor, I would move at this time to
8 introduce Defendant's Exhibit No. 15 and 16.

9 BY THE COURT: All right.

10 (First Citizens Bank Statement dated June 12, 2015 entered
11 into evidence as Defendant's Exhibit No. 15)

12 (Bank of America Bank Statement dated June 30, 2015 entered
13 into evidence as Defendant's Exhibit No. 16)

14 MR. OSBORNE: Your Honor, this is the first -- we've gone
15 over these checks before and this is the first time they've been
16 indicated that they're salary. Sworn testimony in the past has
17 said these were loan repayments.

18 BY THE COURT: You can certainly cross-examine him on that.

19 MR. BURNEY: I think I moved to introduce---

20 BY THE COURT: Yes, sir.

21 Q Let's go to the \$60,000. What was the \$60,000 for?

22 A The \$60,000 is to catch-up for salaries and the \$40,000 I
23 put back into the company in March.

24 Q So, in June 2015 your company wrote a check out of its
25 account that you deposited into your joint account, \$60,000?

1 A Yes, sir.

2 Q That was in June 2015?

3 A Correct.

4 Q But previously, in February 2015, you put money in of
5 \$40,000?

6 A That's correct.

7 Q If we look at the spreadsheet that you have prepared on page
8 2 where it breaks down the month had you even taken a salary from
9 January through May?

10 A No, nothing.

11 Q It is your contention that your company's playing catch-up?

12 A That's correct.

13 Q If we look again on the pages on this document that you
14 prepared does it go through the years 2014 as well?

15 A Yes.

16 Q And 2013?

17 A Yes.

18 BY THE COURT: Gentlemen, I want us to be mindful of time,
19 but the matter was only set for 45 minutes. That's what the
20 requested time was. I can give you a little more time, but we
21 need to be sensitive.

22 MR. BURNEY: I'm almost done with him. I'm sorry, Your
23 Honor. I thought we had you for the full morning. My apologies.

24 Q Let me show you what's been marked as Defendant's 17 and 18.
25 Do you recognize these documents?

1 A Yes, sir.

2 Q These documents were provided by your CPA to China
3 Construction?

4 A Yes, sir.

5 Q Do they show your employees and what your employees were
6 paid throughout the year?

7 A Yes, sir.

8 MR. BURNEY: Your Honor, I would move at this time to
9 introduce Defendant's 17 and 18 into evidence.

10 BY THE COURT: All right. Thank you, sir.

11 (MS Production Employee Pay Record entered into evidence as
12 Defendant's Exhibit No. 17)

13 (MS Production Employee Quarterly Contribution Report
14 entered into evidence as Defendant's Exhibit No. 18)

15 Q If we look at Defendant's Exhibit 18. This is the year
16 2012? Is this for the year 2012?

17 A Yes, sir.

18 Q Does it show what you paid your employees during that year?

19 A Yes, sir.

20 Q Is Patricia Sprenger listed on there at all?

21 A No, sir.

22 Q And the next Exhibit is for the year 2015?

23 A Yes, sir.

24 Q Does it show Patricia Sprenger as being -- receiving money
25 at that time?

1 A Yes, sir.

2 Q Did you eventually employ Patricia?

3 A Yes, I did.

4 Q When approximately was that?

5 A September or October of last year.

6 Q Why did you employ her?

7 A Because of the time she's spending and we need her there is
8 becoming more and more.

9 Q Let me show you Defendant's Exhibit 19. Do you see the
10 check dated June 4, 2015 in the amount of \$50,000?

11 A Yes, I do.

12 Q Is that for cash?

13 A Yes, it is.

14 Q Is that written out of your account that you have with your
15 wife at First Citizens?

16 A That's correct.

17 Q Did you also write checks for cash out of your individual
18 account that you have with your wife?

19 A Yeah.

20 Q What's the purpose of that?

21 A Just like to keep what I need at home and pay all bills,
22 just for personal bills.

23 Q Would you use this money to help the business?

24 A Also, yes.

25 MR. BURNEY: Your Honor, I would introduce Defendant's

1 Exhibit No. 19.

2 A Can I add something? 25,000 of this money went back into
3 the business in July of last year.

4 (Copies of Checks entered into evidence as Defendant's
5 Exhibit No. 19)

6 Q Is that the deposit slip that we have---

7 A Yes.

8 Q Is that the deposit shown in Defendant's Exhibit No. 12?

9 A Yes.

10 MR. BURNEY: That's all I have, Your Honor.

11 BY THE COURT: All right. Your witness.

12 CROSS-EXAMINATION BY MR. OSBORNE:

13 Q Mr. Sprenger, where does MS Production bank?

14 A Where?

15 Q What bank?

16 A Bank of America.

17 Q Who holds the mortgage for the property?

18 A Small Business loan.

19 Q It's not Bank of America?

20 A No.

21 Q Does the Small Business loan, do they have any sort of
22 agreement where they have control over your account at Bank of
23 America?

24 A Yes. They have control of all of my receivables and all of
25 my contracts---

1 Q If they -- you're telling me if they wanted to they could
2 talk to Bank of America and they would have the authority to take
3 money out of your account at any point?

4 A I don't think so. That's what we read to them. They have
5 access to all of my cash, my contracts, my equity and all of
6 that.

7 Q Do you have any sort of agreement that has -- between ---
8 that Bank of America has that says you give the SBA the ability
9 to come into your account and take money?

10 A I don't recall a written statement. The mortgage agreement
11 states they have access to all of my receivables and all of my
12 equity.

13 Q It says that but, in practice, if they tried to come in and
14 take money out of your account---

15 A I don't know how the law works in practice with that other
16 than what I signed with the Small Business loan.

17 Q The Small Business loan, they don't have possession of the
18 cash that you keep in your house, do they?

19 A No.

20 Q Mr. Burney brought up a check that was written in May of
21 this year, a \$60,000 check. Do you remember talking about that?

22 A Yes.

23 Q Do you remember having your deposition taken in September?

24 A Yes, sir.

25 Q You were asked about that check. You were asked by Ms.

1 Heyward: "Do you recall writing a check to your wife in the
2 amount of \$60,000 on May 27, 2015?"

3 What did you answer?

4 A "I do."

5 Q She asked you: "Why did you do that?"

6 A "Like I always do when I take money and frequently do as you
7 probably saw"---

8 THE COURT REPORTER: Can you start over? I can't---

9 THE WITNESS: Oh, the microphone. I'm sorry.

10 THE COURT REPORTER: I couldn't hear you.

11 THE WITNESS: I'm sorry.

12 A Could I take this---

13 Q Yes. So, Ms. Heyward asked you about the check on May 27,
14 2015. And you---

15 A "I do."

16 Q And she asked why you wrote that check. How did you answer?

17 A "Like I always do when I take money and frequently do as you
18 probably saw before."

19 Q So, when you say you "take money", that means you've loaned
20 money to the company and you're taking it back?

21 A No. When I pay myself, I have not received salaries.

22 Q Does this say anything about salary?

23 A No. It doesn't specifically say salary, no.

24 Q It says you were paying yourself back for money you took
25 from -- that you gave to the company?

1 A My services -- that year, as we just went through, I didn't
2 receive any salary from the month January until June.

3 Q But in your deposition you didn't say anything about salary,
4 did you?

5 A Not specifically salary, no.

6 MR. OSBORNE: Your Honor, I think that's all I have for Mr.
7 Sprenger. I would like to get into my argument.

8 BY THE COURT: All right. Any other questions?

9 MR. BURNEY: None of him. I have a quick witness, Your
10 Honor.

11 BY THE COURT: All right. You can have a seat, sir. Yes,
12 sir.

13 (witness excused)

14 BENJAMIN DAVIS O'DELL, BEING FIRST DULY SWORN, TESTIFIED AS
15 FOLLOWS:

16 BY THE COURT: Thank you. Come around and have a seat,
17 please.

18 If you'll state your full name.

19 THE WITNESS: Sure. Benjamin Davis O'Dell.

20 DIRECT EXAMINATION BY MR. BURNEY:

21 Q Mr. O'Dell, what do you do for a living?

22 A I am a CPA.

23 Q Are you the person who prepared the tax returns for Mr.
24 Sprenger's company?

25 A Yes, sir.

BENJAMIN DAVIS O'DELL--DIRECT BY MR. BURNEY

1 Q Is it your company that responded to the subpoena of China
2 Construction for the records?

3 A Yes, sir.

4 Q Are you familiar with his tax returns?

5 A Yes.

6 Q Does his wife claim any money written to her from the
7 company as income?

8 A No, sir.

9 Q Is she taxed on that?

10 A No, sir.

11 MR. BURNEY: That's all I have of this witness, Your Honor.

12 MR. OSBORNE: Nothing from me, Your Honor.

13 BY THE COURT: All right. I appreciate you coming in.

14 MR. BURNEY: Your Honor, he's under subpoena. I don't think
15 we'll need him anymore, if he may be excused.

16 BY THE COURT: Mr. O'Dell, you're free to go.

17 THE WITNESS: Thank you.

18 BY THE COURT: Yes, sir.

19 (witness excused)

20 BY THE COURT: All right. Anything else then for the record
21 as far as testimony or evidence?

22 MR. OSBORNE: I would like to put this notebook in as an
23 exhibit.

24 BY THE COURT: All right.

25 (Notebook entered into evidence as Plaintiff's Exhibit No.

1 1)

2 BY THE COURT: Just for the record, if you could give a
3 brief explanation of what's in that large notebook.

4 MR. OSBORNE: It has filings from this case, deposition
5 transcripts -- it's also got an index at the front -- but
6 basically filings, deposition transcripts -- a lot of the stuff
7 is duplicate of what Mr. Burney's put in. It's got the UCC
8 Financing Statements, and then there are a couple of cases that
9 I've included that I may reference today.

10 BY THE COURT: Okay. All right.

11 MR. OSBORNE: Your Honor, getting into my argument, as you
12 know, we've been here before, but we contend that since 2013 MSPS
13 has made over \$360,000 in fraudulent transfers to Manfred and
14 Patricia Sprenger.

15 Our motion is based on the Statute of Elizabeth which
16 basically says that transactions or transfers can be set aside in
17 two instances: one, when there's no consideration and second,
18 when there is consideration but there's fraudulent intent.

19 I guess to address first the \$7- and \$14,000 transfer---

20 BY THE COURT: All right. Let me -- and I apologize for
21 interrupting, but I know I'm interrupting you -- Defendant, at
22 least in one of their filings, argues that the Statute of
23 Elizabeth is limited solely to real estate transfers. What's
24 your position on that?

25 MR. OSBORNE: I would agree that most of the time it comes

1 up in real estate transfers, but there's South Carolina case law
2 where it applies to transfers of assets outside of a company. I
3 think it's -- I didn't print that case out. It's Dufresne v.
4 Hilton Head -- it's something with Hilton Head Island, and it
5 dealt with a company that transferred all of their assets out of
6 the company. That case was actually overruled, but it was
7 overruled on other grounds. They had a grossly inadequate
8 standard for consideration. But that's the one offhand I can
9 remember, but they have applied the Statute of Elizabeth outside
10 of real estate transactions.

11 BY THE COURT: Mr. Burney, let me ask you, is it still your
12 client's position that the Statue of Limitation (sic) does not
13 apply to anything other than real estate conveyances?

14 MR. BURNEY: Well, the Statute of Elizabeth has been
15 codified. I think it kind of goes back through the position that
16 the Statute of Elizabeth only applies to real estate conveyances.

17 BY THE COURT: Well, I know you're taking that position. I
18 want to know what the law says.

19 MR. BURNEY: If you look at the statute, it gives a broad
20 explanation of what it applies to.

21 MR. OSBORNE: In the language in the statute, it says goods,
22 chattels -- I mean, the beginning phrase of the statute starts
23 off with about every sort of property that you could have.

24 BY THE COURT: Well, y'all are protected on the record on
25 that. From my independent review of the law, it appears that the

1 case of Gerard which is 365 S.C. 151 -- it was reversed on other
2 grounds -- but in that case it appeared to be a rather broad
3 interpretation of the Statute of Elizabeth including assets other
4 than real property.

5 Then also there is a United States District Court decision
6 that came out in September of 2015, PCS Nitrogen. All I have is
7 a Westlaw cite which is 2015WL5122878 where Judge Seymour, in
8 ruling on any number of other issues, specifically held that cash
9 transfers are avoidable as fraudulent conveyances under the
10 Statute of Limitations (sic) in South Carolina.

11 So, both the state court and federal court -- I'm going to
12 take that issue off the table, but I wanted to make sure that
13 both of y'all had it protected on the record in case this does
14 need to go up.

15 Now, all right.

16 MR. OSBORNE: I'll start with the \$7- and \$14,000 transfers,
17 we heard that these were made to Patricia. They were made when
18 she was not an employee of the company. We would say those are
19 without consideration. That's all we need to prove there. We
20 don't have to prove fraudulent intent. They were made to someone
21 who wasn't an employee of the company and, therefore, they can't
22 have consideration.

23 Then also in supplemental proceedings, Mr. Sprenger
24 testified that he didn't even take a salary. So, how he can say
25 now that those were his salary? It contradicts what he's

1 previously testified to.

2 More importantly, though, I think there are the large
3 transfers, and those tend to happen at opportune times for Mr.
4 Sprenger. The first one that we'll point to was on March 27,
5 2014. He wrote a \$40,000 check to his wife, and that was about
6 four days before China first filed suit against him. There had
7 been correspondence back and forth between our client and Mr.
8 Sprenger. He knew that they were about to file a lawsuit.

9 The next transfer is a \$27,000 check to Patricia, and that
10 was on July 30, 2014. On July 27, our firm sent Mr. Sprenger a
11 copy of our motion for a default judgment. So, it's right around
12 the time he would have received that letter, he makes a \$27,000
13 payment to Patricia. Then there's -- September 29, 2014 there's
14 a \$70,000 check to Patricia and this was---

15 BY THE COURT: I'm sorry, that was when again?

16 MR. OSBORNE: September 29, 2014.

17 BY THE COURT: All right.

18 MR. OSBORNE: That was \$70,000 and that was about two weeks
19 after he received notice of the damages hearing in this case.
20 Then in November 2014 -- these kind of go -- there are the checks
21 and then there are also the cash withdrawals. On November 13,
22 2014 there was the \$20,000 cash withdrawal from the First
23 Citizens account, and that was five days before the damages
24 hearing.

25 Then we have the Rule to Show Cause that was issued on May

1 1st. May 27, 2015 there was a \$60,000 check to Patricia. The
2 supplemental proceedings hearing was 5 days later, on June 2nd---

3 BY THE COURT: Is all of this in Plaintiff's 1?

4 MR. OSBORNE: Yes, sir. I'm not sure if it's all --
5 everything's there. I'm not sure if I, you know, put a timeline
6 actually in there.

7 BY THE COURT: Okay.

8 MR. OSBORNE: Then on June 4th, two days after the
9 supplemental proceedings hearing, that's when a cash withdrawal
10 of \$50,000 was made by Patricia. Then on November 18th, which is
11 the same day that there was the last hearing in which you
12 reminded Mr. Sprenger not to make any transfers out of the
13 ordinary course, he writes a \$10,000 check to himself. Then on
14 December 3, 2015 he also writes a \$10,000 check to himself.

15 So, we submit that all of these transfers, they come at very
16 opportune times for him. There's not a -- looking back -- you
17 know, unless there's something coming up, he's not making these
18 sort of transfers.

19 We understand that he now argues that these are loan
20 repayments, but there's no documentation of the loan. There's no
21 notes evidencing how much he's owed, how much he hasn't been paid
22 back.

23 On that point, he knows he has other judgments against him
24 and even if they are loan repayments, he doesn't have -- it's not
25 his choice to choose who he pays back first. We're a judgment

1 creditor. He basically sits in the shoes of an unsecured
2 creditor. He doesn't have a note. He doesn't have a security
3 interest. We submit our judgment lien has priority over his
4 unsecured loan.

5 Moving into the -- I know Mr. Burney has talked about the
6 SBA Security Agreement, and there is a Security Agreement. We're
7 not going after anything that's inventory, any equipment. We
8 want the money in the deposit accounts and the cash that's in his
9 home. They don't have a perfected security interest over the
10 deposit accounts or the cash. To have a perfected security
11 interest in the deposit account, they have to have control and
12 that means either the secured party has to be the bank itself
13 that holds the mortgage or they have to have some sort of
14 agreement that says, "We, the SBA, can come in at any time and
15 take that money out of the account, no questions asked." They
16 have the agreement -- there's nothing with the Bank of America
17 that says the SBA can come in and take money in and out of the
18 account, and that's the only way to perfect a security interest
19 in the deposit account, is by control.

20 BY THE COURT: So, is it your client's contention that they
21 are not seeking against assets of the LLC, but they are seeking
22 what your client contends are fraudulent conveyances made by the
23 LLC to Patricia Sprenger?

24 MR. OSBORNE: I think we're -- I wouldn't limit it to we're
25 not seeking assets of the LLC, but we're not seeking assets of

1 the LLC that the SBA has a perfected security interest in.

2 BY THE COURT: Well, has there been any evidence that the
3 LLC has any assets?

4 MR. OSBORNE: They transfer money back and forth.

5 BY THE COURT: Well, I'm talking about like fixed assets.
6 Other than the cash that we've been here on, real property,
7 equipment, things of that nature.

8 MR. OSBORNE: Well, they have -- they have the real
9 property. We know that. And I'm sure in his business they have
10 equipment that's used, and we're not going after that. We
11 understand---

12 BY THE COURT: Okay. That's what -- I just wanted to make
13 sure I understood that.

14 MR. OSBORNE: Yes, sir. You know, the SBA they have --
15 their financing statement, that's a perfected security interest
16 in that inventory, or equipment, whatever it is, but even though
17 it says cash deposit accounts, they don't have a perfected
18 security interest in that. The only way they can do that is by
19 having control of the bank account, which they don't. And the
20 only way they can have a perfected security interest in the cash
21 is to have possession of the cash.

22 In your folder that I handed up, I printed out some sections
23 of the UCC, Article 9 that go through those sections.

24 I know it wasn't really mentioned here today, but there's
25 been the argument that because Mr. Sprenger has other judgments

1 out, we have to sit behind those judgments and we can't execute.
2 That's just not the case. There's the Diligent Creditor Rule
3 which says, you know, "We've spent the time trying to find these
4 assets. We don't have to wait behind a judgment that's ahead of
5 us until we can do anything. We put the time in to find the
6 assets, and we're entitled to those." If there was a fight and
7 there were two creditors going over the same pot, you know, that
8 may come into play but that's not the case here.

9 I would also like to -- for evidence of his fraudulent
10 intent, Courts use the badges of fraud. I'm sure you're familiar
11 with those, but if you look at them, there's a case, the Coleman
12 case which is in your notebook, and it goes through seven
13 different factors. I think we hit pretty much nearly all of
14 them. He was indebted at the time to us when he made the
15 transfers. We argued that he didn't receive consideration
16 especially for the \$7,000 transfers. He transferred the funds to
17 a person who he has a close relationship with.

18 He reserved the benefit of those funds because he's
19 testified that he would take the money, the cash, that was
20 sitting in the house and use it as he deemed fit. Then he tried
21 to conceal it from us. I mean, he was taking money out of his
22 bank account and putting them under his mattress.

23 He can say that he doesn't trust banks, but it seems like he
24 only doesn't trust banks when he has somebody coming after him
25 because there are plenty of times where we see, going through

1 these bank records, that he's got a substantial amount of money
2 in the bank. So, I think his argument that he doesn't trust
3 banks doesn't hold much weight.

4 BY THE COURT: All right. What impact, if any, does the
5 fact that the course of conduct prior to the contract with China
6 Construction was these, you know, very loose -- that's probably a
7 generous phrase -- a very loose transfer between the LLC, and
8 himself, and his wife as far as the transfer in and out of funds?

9 MR. OSBORNE: There may be a history of that, but that
10 doesn't change the fact that he -- he basically made unsecured
11 loans to his company. When he incorporates in South Carolina,
12 there are certain formalities that he has to abide by and if he
13 doesn't, he stands to face the consequences of those. So, when
14 he makes a loan to the company, he could have taken a security
15 interest. He could have filed a UCC Filing Statement saying, "I
16 loaned the company money," and he could have taken collateral --
17 he would have been behind to the SBA, but he could have taken
18 collateral and that would have protected his interest.

19 BY THE COURT: And I don't disagree with you at all, but
20 does the fact that they were doing this before the dealings with
21 China impact the Court's interpretation of the badges of fraud or
22 does it at some point -- as you've done such a good job arguing
23 -- that starting, I think, in March of 2014, shortly before the
24 filing of the lawsuit, at that point does what has been just
25 sloppy business then become a fraudulent conveyance moving

1 forward?

2 MR. OSBORNE: I think it's important to note too that he has
3 a history of having judgments against him. He's admitted that he
4 has prior judgments and, you know -- he knows what's going on at
5 this point and, you know, he knows that if he keeps his bank
6 accounts low, that's probably going to keep creditors away
7 because they seem like it's not worth going to chase after. So,
8 I don't think that changes anything. I think he has a history of
9 having judgments and he's probably learned at this point the best
10 way to deal with that and to try to keep creditors from staying
11 off his back.

12 BY THE COURT: All right. Let me ask another question,
13 moving -- let's assume, just for the sake of our question right
14 now, that the evidence supports your client's position.
15 Obviously, the purpose of supplemental proceedings is to locate
16 assets and have them seized and liquidated toward satisfaction of
17 your client's judgment. What happens if there is evidence to
18 support your client's position but the funds are gone? What does
19 the relief look like?

20 MR. OSBORNE: We would like an Order saying that all of the
21 transfers that he made he needs to pay to us.

22 BY THE COURT: What if he didn't -- what if he says, "I
23 don't have any money"?

24 MR. OSBORNE: We would like to have as much as he has.

25 BY THE COURT: But has there been any evidence that funds

1 are still being held -- I know there's deposition testimony, I
2 think, of \$50,000 that's been in controversy. What evidence is
3 there that these monies still exists, this cash still exists?

4 MR. OSBORNE: We can't say that there's, you know, cash in
5 his house. We just -- there's evidence of him moving money from
6 the company continuously. And we think, you know, if he did that
7 and he didn't take -- didn't write a note, didn't secure his loan
8 -- basically, he can't pick and choose to say, "I'm going to pay
9 myself back first."

10 BY THE COURT: I really do, I agree with that. I think
11 that's an accurate statement of law. But let's say that there is
12 an Order, says, "All right, husband and wife, these "x" dollars
13 were inappropriately, improperly given. You've got to give them
14 back." And then if they say, you know, "Not only do we disagree,
15 Simmons, with your ruling, the money's gone."

16 MR. OSBORNE: If that were the case, we would be open to
17 give him a certain amount of time to try to get those funds up
18 under the condition that he have to do more than, you know, maybe
19 write a letter to the company like he did in the past. We want
20 him to make an effort and try to get us the money that we think
21 we're owed. I know, you know, we can't -- if the money's not
22 there, the money's not there. But I think a strong Order from
23 Your Honor saying that he has a certain amount of time to hand
24 over those assets would be enough. We understand we can't say,
25 "You need to give us all of this money tomorrow." But we would

1 be open to allowing him a certain amount of time to hand over the
2 money and if he needs to get a couple contracts, we can make that
3 where money coming into the account -- or to the business is
4 ordered by you to come to us.

5 BY THE COURT: All right. Anything else you want on the
6 record before I hear from opposing counsel?

7 MR. OSBORNE: Nothing, Your Honor, other than, you know,
8 this is -- it's clear -- we understand that there are challenges
9 with small businesses but, you know, that doesn't give him the
10 right to just throw out any sort of corporate formalities. We
11 think the fact that he's picking and choosing to pay himself back
12 while he has other creditors out there, that it's not equitable
13 and it runs contrary to the law.

14 BY THE COURT: All right. Be glad to hear from you.

15 MR. BURNEY: Your Honor, first, they have not pled
16 fraudulent conveyance. All they did was file a supplemental
17 proceedings. So, I don't think the Court can even address that,
18 but we'll act as though the Court can.

19 As far as corporate formalities, this is an LLC. This is
20 nothing other than a sole proprietorship that just has a certain
21 tax status with the government. So, there are no corporate
22 formalities. If it were a corporation, I would agree that he
23 would need to have some type of note signed for tax purposes
24 because the IRS would require that. They don't require that with
25 an LLC, Your Honor.

1 Fraudulent conveyances, they're just -- what they're failing
2 to do is to look at the whole picture. We've handed to the Court
3 the spreadsheet that my client has prepared to show the months
4 that he does not get paid. We've shown that he's had to float
5 this company. Why would there -- if he were trying to defraud
6 anybody, why would he be putting \$40,000 of his own cash into the
7 company to keep it running? Why would he put his own \$25,000 of
8 cash into the company to keep it running? He would just keep it
9 all out if he were trying to defraud the company.

10 We've given you an index of transfers, Your Honor, showing
11 three-hundred-and-something-thousand dollars beginning in 2013
12 going to Patricia Sprenger. Mr. Sprenger testified that he was
13 just too lazy to write himself a check, gave that money to his
14 wife, which she deposited into the exact same account that he
15 would have deposited the money to had he written the check to
16 him.

17 His CPA testified that they didn't even include that money
18 on Mrs. Sprenger's tax return. She wasn't taxed on that and
19 didn't claim it. The reason why is because he has taken that
20 money as his salary; otherwise, they wouldn't have claimed
21 anything.

22 And if you look through -- when we start talking about the
23 badges of fraud and departure -- they have to show departure from
24 the usual method of business. The usual method of business over
25 the years is to write the checks to Patricia Sprenger. They were

1 doing that since 2012. Should they have been doing that? I
2 don't think they're prevented from doing that. But when you
3 start dealing with small businesses that employ very few people,
4 he's having to float his company. There are months that he's not
5 taking any money.

6 BY THE COURT: But yet he didn't -- I mean, he said to the
7 state, "I want you to recognize this business as a separate
8 entity, an LLC."

9 MR. BURNEY: Right.

10 BY THE COURT: "But yet I want to continue treating it like
11 it's my personal bank account, and I don't have notes. I don't
12 have agreements. I don't have corporate minutes that support all
13 of this." Can he have it both ways?

14 MR. BURNEY: Well, he can have it both ways because it's not
15 required. It's a small business. As an LLC, you don't have to
16 have that corporate formality. He's getting that protection as
17 an LLC from lawsuits and such individually that a sole
18 proprietorship wouldn't necessarily have, but he wasn't using
19 that as his own personal bank account. Is he supposed to work
20 for free? He's not working for free. We see where the money's
21 coming out every month. The checks are just written to her, put
22 into their joint account. If you took all of those checks out,
23 he has no income at that point in time. I don't think the Court
24 can force him to work for free. He's entitled to an income.

25 Would I have liked to have all of those checks written to

1 Manfred Sprenger throughout -- yeah, I would have but I don't
2 have that. And if it would have been a corporation, I think we
3 would have a bigger problem with that, Your Honor.

4 But I think it's -- I know -- I understand the position --
5 they want to say all of these transfers are fraudulent because
6 that's all they have to go on because they can't get past the
7 priority of the SBA which has the secured interest in everything.
8 We presented that to the Court. But if you would go back and you
9 see where the accounts are short \$40,000, \$25,000, but for him
10 putting money back in, how can that be fraudulent? When you see
11 that he writes a check back to his wife and to him for \$60,000,
12 if you look through the records, you see where he put \$40,000 in
13 the months before and he hadn't taken a salary for the first six
14 months of that year. So, if they are a fraudulent transfer, he
15 would be doing it a different way than what they're doing at this
16 point in time.

17 Surely, if they were filing taxes to the Federal Government
18 and if that were truly Mrs. Sprenger's income, they would have
19 claimed that as income on the tax returns, not his. So, if
20 there's a fraudulent transfer, who are they defrauding if they're
21 telling the Federal Government that's his money and he's lending
22 money back to the company?

23 BY THE COURT: Is there evidence that these funds are in
24 existence?

25 MR. BURNEY: The funds you're saying he took out of the

1 company? No. There's no evidence that that money's there. He
2 would pay himself. They would put money into the joint account.
3 They would use that for their personal household expenses, and
4 they would take money out as cash. That's how they've done it
5 over the years, and they're entitled to do that because,
6 otherwise, if you found these transfers to Patricia were
7 fraudulent, then you've said that he can't pay himself in any
8 form or fashion and I don't think the Court can say he's got to
9 work for free.

10 If you just switch the names to them, he's paying the
11 income, as he stated, that he would be paying himself just by
12 virtue of being the owner of the company. He's the last person
13 to get fed because he's got to pay for supplies. He's got to pay
14 for his employees. And that's just how they've run the business
15 over the years, not to defraud anybody. If that were to be the
16 case, they wouldn't have started paying Patricia until after they
17 got into trouble. But as Mr. Sprenger told you, since 2011,
18 they've been doing that.

19 BY THE COURT: All right. Anything else then for the
20 record?

21 MR. OSBORNE: I have one more point, Your Honor.

22 BY THE COURT: Yes, sir.

23 MR. OSBORNE: One, there's the \$8,000 in the trust account.
24 So, we know that money's there.

25 BY THE COURT: Is that money still there?

1 MR. BURNEY: It's in my trust account. But again, we take
2 the position that it's his money. That was in their house.

3 BY THE COURT: All right.

4 MR. OSBORNE: Then also -- the thing about the salary is how
5 far back are we going to go? Are we going to go all of the way
6 back to 2007 and say, "You missed a month back then and now we
7 can catch up." I think we've got to draw a line somewhere, and
8 we can't just use the argument that, "I missed a salary here and
9 now I'm going to return it." The fact that he says an LLC
10 doesn't have to have any sort of formalities, I mean, it's
11 separate and distinct. He gets the protection of not being
12 personally liable for things, but now he wants to argue that --
13 he basically can't have his cake and eat it too.

14 I think that's it, Your Honor.

15 BY THE COURT: All right. Gentlemen, if y'all would give me
16 a couple of weeks to look over this small library y'all have been
17 kind enough to bestow upon me, and then probably what I will do
18 is just do a telephone conference call.

19 And I do appreciate having good lawyers and some interesting
20 issues here. So, I will have my docket coordinator get in touch
21 with you soon.

22 Gentlemen, if y'all wouldn't mind going through the exhibits
23 with my court reporter just to make sure that they're all staying
24 here.

25 All right. Thank you so much.

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MR. BURNEY: Thank you, Your Honor.

MR. OSBORNE: Thank you, Your Honor.

-----END OF REQUESTED TRANSCRIPT OF RECORD-----

1 The undersigned, Wanda E. Fudge, Court Reporter, Office of
2 Master in Equity for Greenville County, South Carolina do hereby
3 certify that the foregoing is a true, accurate and complete
4 Transcript of Record of all of the proceedings had and evidence
5 introduced in the hearing of the captioned case, relative to
6 appeal, before The Honorable Charles B. Simmons, Jr., as Master
7 in Equity for Greenville County, South Carolina on the 2nd of
8 March 2016.

9 I do further certify that I am neither of kin, counsel, nor
10 interest to any parties hereto.

11 October 4, 2016

12
13 Wanda E. Fudge

14 Wanda E. Fudge, CCR

15 Certified Court Reporter
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INDEX OF TRANSFERS

	Date	Check No.	Payable To The Order Of	Amount
1.	8/29/2013	53663	Patricia Sprenger	\$7,000.00
2.	9/27/2013	53716	Patricia Sprenger	\$7,000.00
3.	10/30/2013	53751	Patricia Sprenger	\$7,000.00
4.	11/26/2013	53784	Patricia Sprenger	\$7,000.00
5.	2/25/2014	53894	Patricia Sprenger	\$7,000.00
6.	3/27/2014	53948	Patricia Sprenger	\$40,000.00
7.	3/27/2014	53946	Patricia Sprenger	\$7,000.00
8.	4/28/2014	54042	Patricia Sprenger	\$7,000.00
9.	5/14/2014	54079	Patricia Sprenger	\$1,600.00
10.	5/29/2014	54084	Patricia Sprenger	\$7,000.00
11.	6/24/2014	54119	Patricia Sprenger	\$7,000.00
12.	7/30/2014	54165	Patricia Sprenger	\$27,000.00
13.	8/27/2014	54191	Patricia Sprenger	\$7,000.00
14.	9/29/2014	54255	Patricia Sprenger	\$70,000.00
15.	9/29/2014	54252	Patricia Sprenger	\$7,000.00
16.	11/3/2014	54283	Patricia Sprenger	\$7,000.00
17.	12/22/2014	54341	Patricia Sprenger	\$7,000.00
18.	5/27/2015	54522	Patricia Sprenger	\$60,000.00
19.	6/23/2015	54548	Patricia Sprenger	\$7,000.00
20.	8/12/2015	54598	Manfred Sprenger	\$7,000.00
21.	9/22/2015	55055	Manfred Sprenger	\$7,000.00
22.	9/23/2015	55057	Manfred Sprenger	\$14,000.00
23.	9/24/2015	54806	Patricia Sprenger	\$499.56
24.	10/6/2015	55060	Manfred Sprenger	\$7,000.00
25.	10/8/2015	55701	Patricia Sprenger	\$499.56
26.	10/15/2015	55708	Patricia Sprenger	\$499.56
27.	10/22/2015	55716	Patricia Sprenger	\$499.56
28.	10/29/2015	55723	Patricia Sprenger	\$499.56
29.	11/5/2015	55730	Patricia Sprenger	\$499.56
30.	11/12/2015	55737	Patricia Sprenger	\$499.56
31.	11/18/2015	55118	Manfred Sprenger	\$10,000.00
32.	11/19/2015	55743	Patricia Sprenger	\$499.56
33.	11/27/2015	55749	Patricia Sprenger	\$499.56
34.	12/3/2015	55139	Manfred Sprenger	\$10,000.00
35.	12/3/2015	55757	Patricia Sprenger	\$499.56
36.	12/7/2015	55140	Manfred Sprenger	\$2,800.00
37.	12/10/2015	55766	Patricia Sprenger	\$499.56
38.	12/17/2015	55774	Patricia Sprenger	\$499.56
39.	12/24/2015	55782	Patricia Sprenger	\$499.56
40.	12/24/2015	55790	Patricia Sprenger	\$499.56
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- Tamper Resistant Toner Area
- Visible Fibers
- Invisible Fibers
- VOID Indication
- Security Weave™ on Backer

DO NOT GET IF:

- Pattern on front of check does not vary in color from edge to edge
- Word "CheckLock™" is not visible in paper when held to light
- Pink color does not fade & reappear when rubbed or scratched on
- "INTUIT™ CHECKLOCK™ SECURITY SYSTEM" not visible in magnification
- Stains or marks appear on front or back
- Ink on back looks pink or has disappeared
- Printed information appears tampered with
- Information appears broken or scratched and/or white areas show any sign of paper damage
- Red and blue fibers are not visible
- White areas fibers are not visible under ultraviolet light
- "VOID" does not clearly to the left of this message
- "ORIGINAL DOCUMENT" cannot be read

Listed and not listed check security features exceed industry standards.

 Padlock icon on front and back alerts this check has security features

 Check icon on front and back alerts this check has security features

 Check icon on front and back alerts this check has security features

 Check icon on front and back alerts this check has security features

VOID ANY OTHER BANKS. THIS TICKET IS NOT VALID FOR ANY OTHER BANK. IF YOU HAVE A QUESTION, CALL 1-800-884-4798.

DEPOSIT TICKET

MANFRED SPRENGER
PATRICIA R SPRENGER

PH. 884-248-4798
308 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29680

87-604/538

422

CASH —

CHECKS 545.98

7,000.00

DATE 08-14-15
DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

CHECKS OR TOTAL
FROM OTHER SIDE —

SIGN HERE IF CASH RECEIVED FROM DEPOSIT

TOTAL
DEPOSITS

SUB TOTAL —

1

LESS CASH —

First Citizens
First Citizens Bank & Trust Company, Inc.

NET
DEPOSIT

\$

7,000.00

DO NOT USE DEPOSIT TICKET ROUTING # FOR
AUTOMATIC PAYMENTS. USE VOIDED CHECK

01

ADDITIONAL CHECK LISTING SPACE

CHECKS
LIST SEPARATELY

DOLLARS

CENTS

Branch: 422

Seq: 13

Batch: 008188

Date: 08/18/15

DD \$7,000.00

THIS TOTAL
MUST BE
ENTERED ON
OTHER SIDE

CHECK COUNT - FOR FINANCIAL INSTITUTIONS USE ONLY

X	1's	
X	2's	
X	5's	
X	10's	
X	20's	
X	50's	
X	100's	
TOTAL	\$	

08/18/15

CASHOW IF ALL CASH SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COINING

MS Production Solutions LLC
283 Beverly Road
Greenville, SC 29609
854-244-6505

BANK OF AMERICA, NA
87-428/533

53716

9/27/2013

PAY TO THE ORDER OF Patricia Sprenger

\$ 7,000.00

Seven Thousand and 00/100 DOLLARS

A THAYER DESIGN COMPANY

Patricia Sprenger
308 Shagbark Circle
Simpsonville SC 29680

MEMO

RECAPITULATING FORGONE ALTERNATIVES CHECKS IS EXTREMELY DIFFICULT DUE TO COMPLEXITY OF SECURITY FEATURES.

SECURITY FEATURES:

- 64-bit Addressed Firmware
- Cryptographically Warrantable
- Unique Encrypted File
- Significantly Reduced or Nonexistent Suits
- Consistently Strong Live Appops
- Fully Signed on Back
- Random Address
- Thorough Malicious Toner Allow
- Various Factors
- Irreversible Entries
- VO C-100/Alison
- Proprietary Signature Warrantable
- Detailed and Detailed C-100/Alison
- C-100/Alison

SECURITY FEATURES:

- 64-bit Addressed Firmware
- Cryptographically Warrantable
- Unique Encrypted File
- Significantly Reduced or Nonexistent Suits
- Consistently Strong Live Appops
- Fully Signed on Back
- Random Address
- Thorough Malicious Toner Allow
- Various Factors
- Irreversible Entries
- VO C-100/Alison
- Proprietary Signature Warrantable
- Detailed and Detailed C-100/Alison
- C-100/Alison

Branch: 422
 Seq: 11
 Batch: 003075
 Date: 09/30/13

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR ADMINISTRATIVE USE

ENDORSE HERE
J. P. Spragg

Electronic Endorsements						
Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
09/30/2013	000006700127723	53201487	-1	N		FIRST-CITIZENS BANK
09/30/2013	000006700127723	53100300	Undetermined	Y		FIRST-CITIZENS BANK
10/01/2013	002292579707	112002080	CoI Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						

Bank of America



Capture Date: 11/04/2013 Sequence #: 2992149475

CASH ON HAND - ALL CASH MUST BE SECURED BY THE ISSUING BANK AND MUST BE TAMPER-PROOF AND COPY-PROOF

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
67-4461539

53751

10/30/2013

PAY TO THE ORDER OF Patricia Sprenger \$ 7,000.00

Seven Thousand and 00/100 DOLLARS

Patricia Sprenger
308 Shagbark Circle
Simpsonville SC 29680

MEMO

VOID AREA

VOID AREA

PLEASE SIGN HERE
Patricia Sprenger

DO NOT WRITE STAMP OR SIGN BELOW THIS LINE

Branch 422
Seq: 155
Batch: 003821
Date: 11/01/13

As the issuer of this security, you agree to maintain the security of the cash on hand and to replace any cash on hand that is lost or stolen.

To learn how to protect your cash on hand, visit www.frb.org.

REMI - AVOID FORGING OR ALTERING
SECURITY FEATURES
DO NOT SIGN HERE

VOID AREA

VOID AREA

Electronic Endorsements
Date Sequence Bank # Endrs Type TRN RRC
11/01/2013 000006700039876 53201487 -1 N
11/01/2013 000006700039876 53100300 Undetermined Y
11/04/2013 002992149475 112002080 Col Bank N
No Payee Endorsements Found

Bank Name
FIRST-CITIZENS BANK
FIRST-CITIZENS BANK
BANK OF AMERICA, NA

Bank of America

Capture Date: 11/29/2013 Sequence #: 3492589370

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
07-118/539

53784

11/26/2013

PAY TO THE ORDER OF Patricia Sprenger

\$ 7,000.00

Seven Thousand and 00/100

DOLLARS

Patricia Sprenger
308 Shagbark Circle
Simpsonville SC 29680

MEMO

Branch: 422
Seq: 245
Batch: 008999
Date: 11/27/13

DO NOT WRITE IN THESE SPACES

NOTE: STAMP OR SIGN BELOW THIS LINE

Patricia Sprenger

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
11/27/2013	000006700121656	53201487	-1	N		FIRST-CITIZENS BANK
11/27/2013	000006700121656	53100300	Undetermined	Y		FIRST-CITIZENS BANK
11/29/2013	003492589370	112002080	Co1 Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found



MS Production Solutions LLC
233 Beverly Road
Simpsonville, SC 29609
884-244-5505

BANK OF AMERICA, NA
67-448539

53894

2/25/2014

PAY TO THE ORDER OF Patricia Sprenger

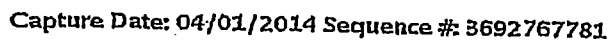
\$ 7,000.00

Seven Thousand and 00/100 ***** DOLLARS

Patricia Sprenger
308 Shagbark Circle
Simpsonville SC 29680

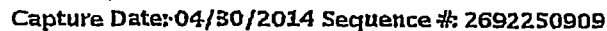
MEMO

[illegible]300

[illegible]

Electronic Endorsements

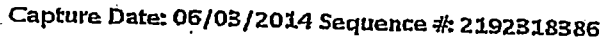
Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
03/31/2014	000006700106884	53201487	-1	N		FIRST-CITIZENS BANK
03/31/2014	000006700106884	53100300	Undetermined	Y		FIRST-CITIZENS BANK
04/01/2014	003692767781	112002080	Co1 Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						



X-12 Spenger		DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE	
Branch: 4221		ASSURED BY: [Signature]	
Seq: 147		Batch: 004524	
Date: 04/29/04		Time: 11:11	
As the issuer, this Check Plus Check may be p. action Secure Plus Check may be p. action your risk of fraud and liability.		To learn how to protect your business, call our 24-hour fraud experts at 1-800-538-0233 or visit www.bnyaml.com	
REPLICATING, FORGING OR ALTERING DIFFICULTY DUE TO CHECK PLUS HIGH SECURITY FEATURES		THIS CHECK IS FETTERLY SECURITY FEATURES	
SECURITY FEATURES		DD NOT CASH IT	
1. MICR LINE		2. VOID WATERMARK	
3. VOID SECURITY PAPER		4. VOID SECURITY PAPER	
5. VOID SECURITY PAPER		6. VOID SECURITY PAPER	
7. VOID SECURITY PAPER		8. VOID SECURITY PAPER	
9. VOID SECURITY PAPER		10. VOID SECURITY PAPER	
11. VOID SECURITY PAPER		12. VOID SECURITY PAPER	
13. VOID SECURITY PAPER		14. VOID SECURITY PAPER	
15. VOID SECURITY PAPER		16. VOID SECURITY PAPER	
17. VOID SECURITY PAPER		18. VOID SECURITY PAPER	
19. VOID SECURITY PAPER		20. VOID SECURITY PAPER	
21. VOID SECURITY PAPER		22. VOID SECURITY PAPER	
23. VOID SECURITY PAPER		24. VOID SECURITY PAPER	
25. VOID SECURITY PAPER		26. VOID SECURITY PAPER	
27. VOID SECURITY PAPER		28. VOID SECURITY PAPER	
29. VOID SECURITY PAPER		30. VOID SECURITY PAPER	
31. VOID SECURITY PAPER		32. VOID SECURITY PAPER	
33. VOID SECURITY PAPER		34. VOID SECURITY PAPER	
35. VOID SECURITY PAPER		36. VOID SECURITY PAPER	
37. VOID SECURITY PAPER		38. VOID SECURITY PAPER	
39. VOID SECURITY PAPER		40. VOID SECURITY PAPER	
41. VOID SECURITY PAPER		42. VOID SECURITY PAPER	
43. VOID SECURITY PAPER		44. VOID SECURITY PAPER	
45. VOID SECURITY PAPER		46. VOID SECURITY PAPER	
47. VOID SECURITY PAPER		48. VOID SECURITY PAPER	
49. VOID SECURITY PAPER		50. VOID SECURITY PAPER	
51. VOID SECURITY PAPER		52. VOID SECURITY PAPER	
53. VOID SECURITY PAPER		54. VOID SECURITY PAPER	
55. VOID SECURITY PAPER		56. VOID SECURITY PAPER	
57. VOID SECURITY PAPER		58. VOID SECURITY PAPER	
59. VOID SECURITY PAPER		60. VOID SECURITY PAPER	
61. VOID SECURITY PAPER		62. VOID SECURITY PAPER	
63. VOID SECURITY PAPER		64. VOID SECURITY PAPER	
65. VOID SECURITY PAPER		66. VOID SECURITY PAPER	
67. VOID SECURITY PAPER		68. VOID SECURITY PAPER	
69. VOID SECURITY PAPER		70. VOID SECURITY PAPER	
71. VOID SECURITY PAPER		72. VOID SECURITY PAPER	
73. VOID SECURITY PAPER		74. VOID SECURITY PAPER	
75. VOID SECURITY PAPER		76. VOID SECURITY PAPER	
77. VOID SECURITY PAPER		78. VOID SECURITY PAPER	
79. VOID SECURITY PAPER		80. VOID SECURITY PAPER	
81. VOID SECURITY PAPER		82. VOID SECURITY PAPER	
83. VOID SECURITY PAPER		84. VOID SECURITY PAPER	
85. VOID SECURITY PAPER		86. VOID SECURITY PAPER	
87. VOID SECURITY PAPER		88. VOID SECURITY PAPER	
89. VOID SECURITY PAPER		90. VOID SECURITY PAPER	
91. VOID SECURITY PAPER		92. VOID SECURITY PAPER	
93. VOID SECURITY PAPER		94. VOID SECURITY PAPER	
95. VOID SECURITY PAPER		96. VOID SECURITY PAPER	
97. VOID SECURITY PAPER		98. VOID SECURITY PAPER	
99. VOID SECURITY PAPER		100. VOID SECURITY PAPER	

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
04/29/2014	000006700065340	53201487	-1	N		FIRST-CITIZENS BANK
04/29/2014	000006700065340	53100300	Undetermined	Y		FIRST-CITIZENS BANK
04/30/2014	002692250909	112002080	Col Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						



Electronic Endorsements

Date	Sequence
06/02/2014	000006700213949
06/02/2014	000006700213949
06/03/2014	002192318386

No Payee Endorsements Found

Bank #	Endrs Type	TRN	RRC
53201487	-I	N	
53100300	Undetermined	Y	
112002080	Co1 Bank	N	

Bank Name
FIRST-CITIZENS BANK
FIRST-CITIZENS BANK
BANK OF AMERICA, NA

Bank of America



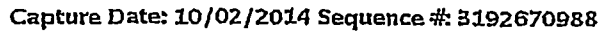
Capture Date: 06/26/2014 Sequence #: 192494710

MS Production Solutions LLC 233 Beverly Road Greenville, SC 29609 864-244-6505		BANK OF AMERICA, NA Aiken, SC 29801 803-648-5339	54119 6/24/2014
PAY TO THE ORDER OF Patricia Sprenger		\$7,000.00	
Seven Thousand and 00/100		DOLLARS	
Patricia Sprenger 308 Shagbark Circle Simpsonville SC 29680		MEMO	
REPLACING FORGING OR ALTERING THIS CHECK IS EXTREMELY DIFFICULT DUE TO CHECKLOCK SECURITY FEATURES: • Microprint features • Security watermark • Checklock watermark • Heat sensitive ink • Security Barcode • Or window security paper • Fingerprint lock on back • Toner detection • Tarnish Resistant Toner Atom • Viable Fibers • Invisible Fibers • VOID Induction • Security Thread on Backer DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE As the issuer, this checklock™ Secure Plus check may help reduce your risk of fraud and liability. To learn how to protect your business, call our check fraud experts at 1-800-548-0239 or visit www.intellicheck.com/fraudcenter Patricia Sprenger			

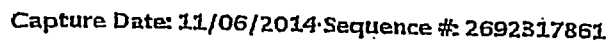
Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
06/25/2014	000006700035940	53201487	-1	N		FIRST-CITIZENS BANK
06/25/2014	000006700035940	53100300	Undetermined	Y		FIRST-CITIZENS BANK
06/26/2014	000192494710	112002080	Col Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found



Electronic Endorsements						
Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
10/01/2014	000006700045270	53201487	-1	N		FIRST-CITIZENS BANK
10/01/2014	000006700045270	53100300	Undetermined	Y		FIRST-CITIZENS BANK
10/02/2014	003192670988	112002080	Co- Bank	N		BANK OF AMERICA, NA.
No Payee Endorsements Found						



Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
11/05/2014	000006700025956	53201487	-1	N		FIRST-CITIZENS BANK
11/05/2014	000006700025956	53100300	Undetermined	Y		FIRST-CITIZENS BANK
11/06/2014	002692317861	112002080	Col Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						

Bank of America



Capture Date: 12/30/2014 Sequence #: 3692776258

MS Production Solutions LLC 233 Beverly Road Greenville, SC 29609 864-244-6505		BANK OF AMERICA, NA Aiken, SC 29801 87-448/630	54341 12/22/2014
PAY TO THE ORDER OF Patricia Sprenger		\$ 7,000.00	
Seven Thousand and 00/100		DOLLARS	
Patricia Sprenger 308 Shagbark Circle Simpsonville SC 29680		Void Cash on days	

REPLICATING FOREIGN OR ATTEMPTING TO COUNTERFEIT THIS CHECK IS EXTREMELY DIFFICULT DUE TO CHECK SECURITY FEATURES.

SECURITY FEATURES:

- Microprint
- Color Shifting Ink
- Security Features
- Chemical Security Paper
- Fingerprint on Back
- Toner Adhesion
- Tamper Resistant Toner Area
- Visible Fibers
- Invisible Fibers
- VOID Indication
- Security Watermark on Back

DO NOT CHECK IF:

- Paper is torn or damaged
- Color is faded or missing
- Ink is not visible or plain
- Paper is not 100% cotton
- Paper is not 100% recycled
- Paper is not 100% virgin
- Paper is not 100% recycled
- Paper is not 100% virgin
- Paper is not 100% recycled
- Paper is not 100% virgin

As the signer, this checklock™ Secure P is check may help reduce your risk of fraud and liability.

To learn how to protect your business, call our check fraud experts at 1-800-448-0839 or visit www.integritychecklock.com

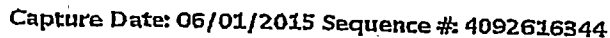
Check # 422
 Batch # 006487
 Date 12/29/14

ENDORSE HERE
 Patricia Sprenger

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
12/29/2014	000006700155638	53201487	-1	N		FIRST-CITIZENS BANK
12/29/2014	000006700155638	53100300	Undetermined	Y		FIRST-CITIZENS BANK
12/30/2014	003692776258	112002080	Co1 Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found

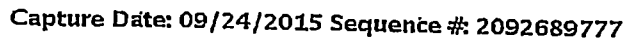


Electronic Endorsements

Date	Sequence
05/29/2015	000006700066443
05/29/2015	000006700066443
06/01/2015	004092616344

No Payee Endorsements Found

Bank #	Endrs Type	TRN	RRC	Bank Name
53201487	-1	N		FIRST-CITIZENS BANK
53100300	Undetermined	Y		FIRST-CITIZENS BANK
112002080	Col Bank	N		BANK OF AMERICA, NA

[illegible]

Electronic Endorsements						
Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
09/23/2015	000006700097265	53100300	-1	N		FIRST-CITIZENS BANK
09/23/2015	000006700097265	53100300	Undetermined	Y		FIRST-CITIZENS BANK
09/24/2015	002092689777	112002080	Col Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						

Bank of America



Capture Date: 09/25/2015 Sequence #: 2492089130

CASH ONLY / ALL OTHERS - SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
Aiken, SC 29801
87-448/538

55057

9/23/2015

PAY TO THE ORDER OF Manfred Sprenger \$ 14,000.00

Fourteen Thousand and 00/100 DOLLARS

Manfred Sprenger
308 Shagbark Circle
Simpsonville SC 29680

MEMO: Salary Jan & Feb 2015

VOID AFTER 60 DAYS

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

Branch 386
Seq 8
Batch 000156
Date: 09/24/15

As the issuer, this check is not valid unless it is signed by the issuer or an authorized agent of the issuer. Your risk of loss is not covered by this check.

To learn how to protect your money, visit www.bankofamerica.com

SECURITY FEATURES:
• Replicating, forging or altering this check is extremely difficult due to the security features.
• Multi-colored background
• Hologram
• CheckLock watermark
• Ion Sensitive Ink
• Security Border or Microprint Lines
• Chemically Sensitive Paper
• Fugitive Ink on Back
• Toner Adhesion
• Protected Against: Pencil, Aqueous, Solvent, Ink, Rubbing, Abrasion, Heat, Cold, UV, etc.

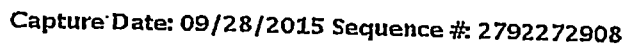
VOID Indicators:
• Visible Fibers
• Invisible Fibers
• Security Watermark on Backer
• Labeled and Full sized check security features are located on the back of the check.

VOID Indicators:
• "VOID" watermark is visible when the check is held up to the light.
• "VOID" watermark is visible when the check is held up to the light.

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
09/24/2015	000006700008094	53100300	-1	N		FIRST-CITIZENS BANK
09/24/2015	000006700008094	53100300	Undetermined	Y		FIRST-CITIZENS BANK
09/25/2015	002492089130	112002080	Col Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found



Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
09/25/2015	000006700031495	53100300	-1	N		FIRST-CITIZENS BANK
09/25/2015	000006700031495	53100300	Undetermined	Y		FIRST-CITIZENS BANK
09/28/2015	002792272908	112002080	Co1 Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found



MS Production Solutions LLC
233 Bereely Road
Greenville, SC 29609
854-244-6505

BANK OF AMERICA, NA
NKEN, SC 29001
67-440539

5812

10/1/2015

PAY TO THE ORDER OF Patricia Sprenger \$ 499.56

Four Hundred Ninety-Nine and 56/100 DOLLARS

Patricia Sprenger
308 Shagbark Cir
Simpsonville, SC 29080

Pay Period: 09/20/2015 - 09/26/2015

[illegible]

318



Capture Date: 10/09/2015 Sequence #: 2292870200

No Electronic Endorsements Found
No Payee Endorsements Found



MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-6305

BANK OF AMERICA, NA
Aiken, SC 29801
01-443-539

55701

10/8/2015

PAY TO THE ORDER OF Patricia Sprenger \$499.56

Four Hundred Ninety-Nine and 56/100 DOLLARS

Patricia Sprenger
305 Shagbark Cir
Simpsonville, SC 29680

VOID

Pay Period: 09/27/2015 - 10/03/2015

320



Capture Date: 10/21/2015 Sequence #: 3492347270

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
554-244-6505

BANK OF AMERICA NA
ANYEN, SC 29601
617-445-023

55708

10/15/2015

PAY TO THE ORDER OF Patricia Sprenger

Four Hundred Ninety-Nine and 55/100 *****

Patricia Sprenger
309 Shegark Cir
Simpsonville, SC 29560

VOID AFTER 60 DAYS

MEMO Pay Period: 10/02/2015 - 10/08/2015

No Electronic Endorsements Found
No Payee Endorsements Found

Bank of America



Capture Date: 11/03/2015 Sequence #: 2792633889

MS Production Solutions LLC 233 Beverly Road Greenville, SC 29609 864-244-8505		BANK OF AMERICA NA AKEN, SC 29611 67-444-529		55723
PAY TO THE ORDER OF Patricia Sprenger		10/29/2015		
Four Hundred Ninety-Nine and 56/100		\$ 499.56		
Patricia Sprenger 308 Shagbark Cir Simpsonville, SC 29680		(A) PROTECTED AGAINST FRAUD		DOLLARS
MEMO Pay Period: 10/16/2015 - 10/22/2015		Valid after 90 days		

No Electronic Endorsements Found
No Payee Endorsements Found

>063100300<
Acct# *****5809
2015-11-02
088063012
13631504
Mobile Deposit

Bank of America



Capture Date: 11/10/2015 Sequence #: 2892101398

MB Production Solutions LLC 233 Lively Road Greenville, SC 29609 804-244-0509		BANK OF AMERICA, NA ATM # 602 79901 87-447537	55730
PAY TO THE ORDER OF Patricia Sprenger		\$ 400.56	11/5/2015
Four Hundred Ninety-Nine and 56/100		DOLLARS	
Patricia Sprenger 308 Shagbark Cir Simpsonville, SC 29680		VOID AFTER 90 DAYS	
MEMO Pay Period: 10/23/2015 - 10/29/2015			

3053100300<
NOE# *****5809
NOE# 11-09
088085806
13825493
Mobile Deposit

No Electronic Endorsements Found
No Payee Endorsements Found



Capture Date: 11/18/2015 Sequence #: 3092053896

MS Production Solutions LLC
233 Bayville Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
ASHEW, SC 29801
07-442539

55737

11/12/2015

PAY TO THE ORDER OF Patricia Sprenger

\$ 499.56

Four Hundred Ninety-Nine and 56/100 DOLLARS

18 PROTECTED AGAINST FRAUD

Patricia Sprenger
308 Shagbark Cir
Simpsonville, SC 29680

Pay Period: 11/01/2015 - 11/07/2015

VOID AFTER 90 DAYS

DO NOT WRITE STAMP OR SIGN BELOW THIS LINE
 ACCOUNT # 2053100300<
 Acct# 42015-11-17
 0886117229
 14036729
 Mobile Deposit
 ORIGINAL DOCUMENT
 www.fidelity.com/fidcenter

No Electronic Endorsements Found
No Payee Endorsements Found

[illegible]

326



Capture Date: 11/25/2015 Sequence #: 2892487412

MS Production Solutions LLC
233 Beverly Road
Cranville, SC 29800
084-244-0505

BANK OF AMERICA, NA
N/171, SC 29801
87-448572

55743

11/10/2015

PAY TO THE ORDER OF Patricia Spronger

\$ 499.50

Four Hundred Ninety-Nine and 50/100*****

10 PROTECTED AGAINST COUNTERFEITING

DOLLARS

Patricia Spronger
300 Shagbark Cir
Simpsonville, SC 20080

VOID AFTER 90 DAYS

PAY PERIOD: 11/08/2015 - 11/14/2015

[illegible]

No Electronic Endorsements Found
No Payee Endorsements Found

Bank of America



Capture Date: 12/01/2015 Sequence #: 4092524633

MS Production Solutions LLC 233 Beverly Road Greenville, SC 29609 864-244-6505		BANK OF AMERICA, NA AIKEN, SC 29801 87-443-539	55749
PAY TO THE ORDER OF Patricia Sprenger		11/27/2015	\$499.56
Four Hundred Ninety-Nine and 56/100		DOLLARS	
Patricia Sprenger 308 Shagbark Cir Simpsonville, SC 29680		VOID AFTER 90 DAYS	
MEMO Pay Period: 11/15/2015 - 11/21/2015		[Signature]	

No Electronic Endorsements Found
No Payee Endorsements Found



Capture Date: 12/11/2015 Sequence #: 3092346464

[illegible]

No Electronic Endorsements Found
No Payee Endorsements Found



MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-8505

BANK OF AMERICA, NA
AIKEN, SC 29801
87-448/539

55140

12/7/2015

PAY TO THE ORDER OF Manfred Sprenger \$ 2,800.00

Two Thousand Eight Hundred and 00/100 DOLLARS

MANFRED SPRENGER
308 SHAGBARK CIRCLE
SIMPSONVILLE SC 29680

VOID AFTER 60 DAYS

MEMO

[illegible]

330

Bank of America



Capture Date: 12/11/2015 Sequence #: 3092346466

MS Production Solutions LLC 233 Beverly Road Greenville, SC 29609 864-244-6505		BANK OF AMERICA, NA AIKEN, SC 29801 87-442639		55139	
12/3/2015					
PAY TO THE ORDER OF Manfred Sprenger		\$ 10,000.00			
Ten Thousand and 00/100		DOLLARS			
Manfred Sprenger 308 Shagbark Circle Simpsonville SC 29680		VOID AFTER 60 DAYS			
[Redacted Signature]		[Redacted Signature]			
[Redacted Address]		[Redacted Address]			
[Redacted Phone]		[Redacted Phone]			
[Redacted Email]		[Redacted Email]			
[Redacted Social Security]		[Redacted Social Security]			
[Redacted Date of Birth]		[Redacted Date of Birth]			
[Redacted Gender]		[Redacted Gender]			
[Redacted Marital Status]		[Redacted Marital Status]			
[Redacted Occupation]		[Redacted Occupation]			
[Redacted Education]		[Redacted Education]			
[Redacted Military Service]		[Redacted Military Service]			
[Redacted Other Information]		[Redacted Other Information]			
[Redacted Signature]		[Redacted Signature]			
[Redacted Address]		[Redacted Address]			
[Redacted Phone]		[Redacted Phone]			
[Redacted Email]		[Redacted Email]			
[Redacted Social Security]		[Redacted Social Security]			
[Redacted Date of Birth]		[Redacted Date of Birth]			
[Redacted Gender]		[Redacted Gender]			
[Redacted Marital Status]		[Redacted Marital Status]			
[Redacted Occupation]		[Redacted Occupation]			
[Redacted Education]		[Redacted Education]			
[Redacted Military Service]		[Redacted Military Service]			
[Redacted Other Information]		[Redacted Other Information]			

No Electronic Endorsements Found
No Payee Endorsements Found



MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
854-244-6503

BANK OF AMERICA, NA
AIKEN, SC 29801
617-410/339

55766

12/10/2015

PAY TO THE ORDER OF Patricia Sprenger \$1,499.56

Four Hundred Ninety-Nine and 56/100 DOLLARS

Patricia Sprenger
309 Shagbark Cir
Simpsonville, SC 29680

VOID AFTER 90 DAYS

Pay Period: 11/27/2015 - 12/03/2015

332



Capture Date: 12/22/2015 Sequence #: 3692793611

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
Aiken, SC 29801
87-445-330

55774

12/17/2015

PAY TO THE ORDER OF Patricia Sprenger \$**499.66

Four Hundred Ninety-Nine and 66/100 DOLLARS

Patricia Sprenger
308 Shagbark Cir
Simpsonville, SC 29680

PROTECTED AGAINST COUNTERFEITING

Validation PG (day)

Pay Period: 12/01/2015 - 12/10/2015

No Electronic Endorsements Found
No Payee Endorsements Found



MS Production Solutions LLC
233 Doverly Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
Aiken, SC 29801
07-440539

55782

12/24/2015

PAY TO THE ORDER OF Patricia Sprenger \$499.56

Four Hundred Ninety-Nine and 56/100 DOLLARS

PATRICIA SPRENGER
308 SHAGBARK CIR
SIMPSONVILLE, SC 29680

VOID AFTER 60 DAYS

MEMO Pay Period: 12/11/2015 - 12/17/2015

334

Bank of America



Capture Date: 12/31/2015 Sequence #: 3692281025

MS Production Solutions LLC 233 Dorely Road Greenville, SC 29609 884-244-6505		BANK OF AMERICA, NA ALEX, SC 29501 874-43-330		55790
		12/24/2015		
PAY TO THE ORDER OF Patricia Sprenger		\$499.56		
Four Hundred Ninety-Nine and 56/100		DOLLARS		
Patricia Sprenger 308 Shagbark Cir Simpsonville, SC 29680		VOID AFTER 60 DAYS		
MEMO Pay Period: 12/18/2015 - 12/24/2015				

Patricia Sprenger

No Electronic Endorsements Found
No Payee Endorsements Found

1 STATE OF SOUTH CAROLINA

COURT OF COMMON PLEAS

2 COUNTY OF GREENVILLE

3
4 CHINA CONSTRUCTION AMERICA
OF SOUTH CAROLINA, INC.,

5 Plaintiffs,

6 Case No.: 2014-CP-23-1871

7 vs

8 MS PRODUCTION SOLUTIONS LLC
a/k/a MSPS STEEL FABRICATORS,

9 Defendants.

10 D E P O S I T I O N

11 WITNESS: MANFRED SPRENGER

12 DATE: Monday, September 21, 2015

13 TIME: 11:10 a.m.

14 LOCATION: Law Offices of
15 Turner & Burney, P.C.
628 NE Main Street
16 Simpsonville, South Carolina

17 TAKEN BY: Attorneys for the Plaintiffs

18 REPORTED BY: GINA M. JOHNSON
Certified Shorthand Reporter
19 Registered Professional Reporter

20
21
22
23 -----
Gina M. Smith Court Reporting, LLC
24 117 Harmon Creek Court
Lexington, SC 29072
25 803-359-5705

1 APPEARANCES:

2 ATTORNEYS FOR PLAINTIFF

3 CHINA CONSTRUCTION AMERICA OF SOUTH
4 CAROLINA, INC.:5 BRUNER, POWELL, WALL & MULLINS, LLC
6 BY: CAITLIN CRESWICK HEYWARD, ESQ.
7 1735 St. Julian Place, Suite 200
8 P.O. Box 61110
9 Columbia, SC 29260-1110

10 ATTORNEYS FOR DEFENDANT

11 MS PRODUCTION SOLUTIONS LLC a/k/a MSPS
12 STEEL FABRICATORS:13 TURNER & BURNEY, P.C.
14 BY: RHETT D. BURNEY, ESQ.
15 628 NE Main Street
16 Simpsonville, SC 2968117 (INDEX AT REAR OF TRANSCRIPT)
18
19
20
21
22
23
24
25

1 STIPULATION: It is stipulated by
2 and between Counsel that this deposition is being
3 taken in accordance with the South Carolina Rules
4 of Civil Procedure, and that the deponent does not
5 waive the right to read and sign the deposition
6 transcript.

7 - - - - -

8 MANFRED SPRENGER, being first duly
9 sworn, testified as follows:

10 EXAMINATION

11 BY MS. HEYWARD:

12 Q. Good morning, Mr. Sprenger.

13 A. Good morning.

14 Q. I'm just going to start by asking you if
15 you recall receiving a notice of deposition to
16 appear here today?

17 A. Yes, I answered the door and received mine
18 and my wife's.

19 Q. Yes. You received one individually,
20 right?

21 A. Yes, mine and my wife's.

22 Q. And your wife's.

23 And also as the 30(b)(6) deponent of MS
24 Production Solutions. Is that correct?

25 A. What now?

1 Q. I subpoenaed the company or --

2 A. Yeah, yeah.

3 Q. -- after I noticed the company, you're
4 here on behalf of the company?

5 A. Yes.

6 Q. Is that right?

7 Are you familiar with this document? I'll
8 represent to you that's the notice of deposition
9 for MS Production Solutions requesting the person
10 most knowledgeable regarding the five points listed
11 below on page 1.

12 A. Yeah.

13 Q. Have you read this document?

14 A. No, I haven't seen it or I haven't read it
15 before.

16 Q. Go ahead and read it and then look up at
17 me when you're finished.

18 A. Okay. Okay.

19 Q. Are you the person most knowledgeable to
20 speak on points 1 through 5?

21 A. Yes, I am.

22 Q. Okay. I also noticed MS Machine Tools
23 Incorporated?

24 A. Uh-huh.

25 Q. Do you recall that?

1 A. Yes.

2 Q. Are you the person most knowledgeable to
3 speak on behalf of MS Machine Tools as well?

4 A. Yes.

5 (DEPO. EXH. 5, Rule to Show Cause and
6 Order of Reference, was marked for identification.)

7 BY MS. HEYWARD:

8 Q. Okay. All right. Mr. Sprenger, I'm going
9 to go ahead and start with this document,
10 Plaintiff's Exhibit 5, I believe. Do you recognize
11 this document?

12 A. Yeah. I think that was just what I gave
13 you, my lawyer.

14 Q. This is a rule to show cause or order of
15 reference. Do you recall being served with this
16 document?

17 A. I don't think I was at the office present
18 when this was served.

19 Q. Okay. Please review that document.

20 MR. BURNEY: We'll stipulate he received
21 it.

22 BY MS. HEYWARD:

23 Q. Okay. You received it?

24 A. Okay.

25 Q. All right. This is an affidavit of

1 service indicating that you were served with this
2 document?

3 A. Yeah. Me personally, I don't think I was
4 there that day.

5 Q. Okay. It says you were, but we've
6 stipulated.

7 A. Okay.

8 Q. If you could turn to page 2. Page 2, that
9 highlighted portion right there, can you read that
10 for me, please?

11 A. It is further ordered that the respondent
12 is hereby restrained and enjoined from making any
13 transaction or transfer or other disposition of
14 property belonging to him/it not exempt from
15 execution pending further order from this Court.

16 Q. Okay. You're familiar that an injunction
17 was placed on MS Production Solutions from
18 transferring any assets or making any transfers?

19 A. I would think that's what that says, yes.

20 Q. Okay.

21 A. But I'm not a lawyer, so I assume that's
22 what is meant here.

23 Q. Okay. And this -- this document is dated
24 May 1, 2015. Is that correct?

25 A. Yeah, May 5th it says here, but --

1 Q. Appears it was filed on May 5th, signed on
2 May 1st.

3 Okay. I'm going to hand you what has
4 previously been marked as Plaintiff's Exhibit 3.
5 Do you have a copy of that? It starts with --

6 A. All those checks?

7 Q. Checks to Patricia?

8 A. Uh-huh.

9 Q. Flip to the last page, please. This check
10 is dated May 27, 2015. Is that correct?

11 A. That's correct.

12 Q. That would be after the date the
13 injunction was placed on you. Is that correct?

14 A. That's correct.

15 Q. Do you recall writing a check to your wife
16 in the amount of \$60,000 on May 27, 2015?

17 A. I do.

18 Q. Why did you do that?

19 A. Like I always do when I take money, and
20 frequently do as you probably saw before --

21 Q. Yes.

22 A. -- take money from the company, pay it to
23 me because I loaned the company a lot of money when
24 I bought the business. So I'm trying to get paid
25 back, which until now it didn't work so well.

1 Q. What -- is your testimony that this is
2 payment -- repayment of a loan --

3 A. Yeah.

4 Q. -- that you made?

5 A. \$350,000 I had to -- was my -- was a
6 conditions of small business loan I had to bring in
7 order to get -- buy the company.

8 Q. Do you have any loan documents evidencing
9 that?

10 A. With the company?

11 Q. Between you and MSPS.

12 A. Yes, it was at the day I bought the
13 business, I think MS -- MS Machine Tool, the only
14 function the company has was to retrieve my 401K
15 money without having to pay the taxes, and that
16 money went straight into MSPS at the lawyer the day
17 we signed, and MSPS Machine Tool owned shares of MS
18 Production Solution.

19 Q. Okay. I'm trying to determine exactly how
20 you can track this \$60,000 check, how you can
21 exactly link it up to a specific loan that you made
22 to the company?

23 A. Well, it's me. Manfred owns MS Machine
24 Tool, MS Production Solution. Manfred's 401K
25 account --

1 Q. Okay.

2 A. -- got cleaned out in order to buy the
3 company. So since this is a small business and not
4 a huge corporation, that's just how it works. You
5 know, I just tried to get my money back, and as you
6 see there, it goes forth and keeps going forth and
7 back between the personal account and my business
8 account.

9 Q. So is it your testimony that that was
10 repayment for the capital contribution that you
11 made to purchase the business?

12 A. As I said before, I'm trying to get
13 repayment. It does not work so well as of yet due
14 to the economy. I'm trying to get repaid the
15 \$350,000 I had to bring to the table in order to
16 buy my company.

17 Q. So you were trying to get repaid for the
18 amount of money -- the purchase amount that you
19 personally put towards buying the company?

20 A. That's correct.

21 Q. Is that correct?

22 A. That's correct.

23 Q. Okay. Tell me exactly how you -- tell me
24 exactly how the company was capitalized from the
25 beginning.

1 A. The company was capitalized with a small
2 business loan of one million 400 something.

3 Q. Right.

4 A. And I had to bring as a condition of small
5 business loan \$350,000 worth of what they call
6 working capital.

7 Q. So your all-in contribution was \$350,000?

8 A. Yes.

9 Q. And that's it?

10 A. That's it.

11 Q. Okay. How do you keep track of how much
12 money has been repaid to you of that \$350,000?

13 A. That's what I'm trying to say, it didn't
14 work so far. There is nothing -- there is no
15 specific documents since this is a family business.

16 Q. Okay. Well, according to you you've
17 gotten repaid at least \$60,000?

18 A. Yes.

19 Q. What else have you been repaid?

20 A. Amounts before -- you saw before those
21 other amounts in there, but according to this
22 document, it goes back into the business as well.
23 There is two checks in there for \$40,000 each which
24 go back into the business.

25 So I take money out, try to repay my

1 \$350,000, and then when -- as my wife said, when I
2 need the money again, I'll pay -- I give it back to
3 the company as a loan again.

4 Q. So this is just determined by you.
5 There's no formal -- most people, most business
6 people, keep a paper trail so when they get audited
7 or when they file taxes it is clear where the money
8 is coming in and where the money's coming out. Is
9 it your testimony today that does not exist?

10 A. There is a paper trail. There is a check
11 written to me. My accountant does my annual tax
12 return, so he knows of -- he can see in my
13 bookkeeping that there's checks written to me.
14 It's called member draw. So what other means of
15 documents are you referring to?

16 Q. A loan document between you and the
17 corporation.

18 A. Maybe I need to make -- as my lawyer
19 advised me after the \$7,000 dispute here to --
20 which I -- before out of convenience I wrote it to
21 my wife. It was always written to me. But it was
22 convenient. And now I changed it back as since my
23 lawyer advised me to do so, to make it, again,
24 payable to Manfred Sprenger instead of --

25 Q. Have you since paid yourself money since

1 the hearing in June?

2 A. I think two maximum. This month I haven't
3 paid myself. Last month I got -- I think once in
4 July I didn't.

5 Q. Okay. How much money did you pay
6 yourself?

7 A. Maybe \$14,000.

8 Q. \$14,000?

9 A. Yeah.

10 Q. And where is that money now?

11 A. In my wife's account -- in our personal
12 account.

13 Q. Your personal account doesn't have very
14 much money in it. I'll represent that to you.

15 A. Uh-huh.

16 Q. Is it in cash?

17 A. That's what you asked my wife already.
18 Yes, there's cash at home.

19 Q. So the \$14,000 that you recently paid
20 yourself in the last two months is in cash?

21 A. Recently since May.

22 Q. What about since June?

23 A. June, I would have to go back and see
24 exactly how many pay -- or how much I paid myself,
25 but what I'm saying is the 7,000 monthly payment

1 I'm trying to pay monthly haven't happened the
2 last -- since June frequently every month. Maybe
3 was once or twice maximum.

4 Q. In the last four weeks, did you pay
5 yourself?

6 A. No.

7 Q. In the last eight weeks, did you pay
8 yourself?

9 A. No.

10 Q. In the last 12 weeks, did you pay
11 yourself?

12 A. Oh, the last eight weeks. Sorry. Except
13 the \$7,000 -- I think I paid myself in
14 August \$7,000.

15 Q. Okay.

16 A. And I don't -- I need to go back in
17 June or July, but I don't think I did in July. I
18 think in June I did, but not in July.

19 Q. Okay. So if I were to count up all of the
20 money that you've paid yourself since you purchased
21 the company, anything over \$350,000, what is that?

22 A. Profit.

23 Q. Profit?

24 A. Uh-huh.

25 Q. Okay.

1 A. That's what I would call it.

2 Q. If you'd been paid -- if you've paid
3 yourself \$350,000 since you purchased the company,
4 wouldn't that extinguish any money the company owes
5 to you for any capital contribution that you made?

6 A. Would I be not allowed as the company
7 owner to have a member withdraw every so often from
8 the company? Is that illegal?

9 Q. I'm asking you --

10 A. No, is that illegal?

11 Q. You do not get to ask the questions in
12 this deposition. I'm the lawyer. I ask the
13 questions. You're the witness.

14 A. Okay.

15 Q. You answer them.

16 A. All right.

17 Q. I'm asking you have you satisfied the
18 amount of capital contribution that you've made to
19 the company, the \$350,000?

20 A. No, no, no. And as you stated before, if
21 you add up all the money over the eight years,
22 what -- the checks written to MSPS other than the
23 \$7,000, which is considered pay -- monthly pay,
24 not -- that's not considered repayment of loan.
25 That's a monthly paycheck.

1 Other than the \$7,000, if you add all
2 those checks up written to Manfred and you add all
3 the checks back up here which are written from
4 Manfred back to the business within the eight
5 years, you will come to find out that the company
6 has not paid Manfred at all for the \$350,000.

7 Q. Does MSPS pay for your cell phone?

8 A. Yes.

9 Q. Does it pay for your employees' cell
10 phones?

11 A. No. Well, for my daughter's which is --
12 she's an employee -- because she has to use it
13 occasionally, and it used to pay for my son's,
14 Marcell, but he's no longer employed, so no.

15 Q. Okay. Do you keep copies of those bills?

16 A. Yeah.

17 Q. If I asked for those, would you be --

18 A. Yeah.

19 Q. -- able to retrieve them for me?

20 A. Of course.

21 Q. You testified in June that there's six
22 employees of MSPS. Do you recall that?

23 A. Uh-huh.

24 Q. Who are they?

25 A. Right now it's Marco Sprenger, Kevin

1 Sprenger, Dave Schemanski, Diana Sprenger, and I
2 forgot the -- I know his name is Blake, but don't
3 ask me now for his last name. If you have
4 paychecks, I'm sure it's in there.

5 Q. What's the first name?

6 A. Blake.

7 Q. Blake?

8 A. Blake or something.

9 Q. Do you -- do they get paid hourly or
10 salary?

11 A. Hourly.

12 Q. Do you have W2 records for all of your
13 employees?

14 A. Yes.

15 Q. If I ask for those, could you provide
16 them?

17 A. They are created by my accountant, yes.

18 Q. So you could retrieve those for me?

19 A. Yeah.

20 Q. How much are they paid hourly?

21 A. It varies from between 13 and \$18 an hour.

22 Q. Okay. Have you given copies of any of
23 that to your lawyer?

24 A. No.

25 Q. No, okay.

1 A. Have I? Well, have I?

2 MR. BURNEY: If you don't have it, I don't
3 have it.

4 BY MS. HEYWARD:

5 Q. Okay. I don't have it.

6 A. Okay.

7 Q. Were there any changes in employment from
8 August 2014 to present?

9 A. August 2014?

10 Q. Yes.

11 A. I'm in a line of business where there is
12 constant changes, so if you ask me -- yeah,
13 there's -- Blake is new. Another one left. So
14 there's constant -- but how many, I would have to
15 go back and see.

16 Q. Okay. I would be able to determine that
17 from your payroll records?

18 A. Yeah, you will see different names.

19 Q. Are you the only one who writes checks
20 from the MSPS bank account?

21 A. Yes.

22 Q. Your wife testified earlier that she
23 writes checks?

24 A. She occasionally signs paychecks. That's
25 it.

1 Q. Why does she do that?

2 A. When I'm not here, people want to get
3 paid.

4 Q. She's not an employee of the company?

5 A. No.

6 Q. Never has been?

7 A. Never has been.

8 Q. Does your wife have authority to withdraw
9 money?

10 A. Say that again.

11 Q. Does she have authority to withdraw money
12 from the MSPS bank account?

13 A. She does not have a card or anything like
14 that. She has the cosign authority, but she can
15 sign checks.

16 Q. She cannot withdraw?

17 A. No.

18 Q. If there were withdrawals, would those be
19 improper?

20 A. If there were withdrawals from the
21 business account?

22 Q. If your wife withdrew money from the
23 business account, would that be -- would that
24 surprise you?

25 A. Yeah, because I wouldn't know how.

1 Q. Okay. Do you keep track of the
2 withdrawals that you make from the business
3 account?

4 A. Yeah.

5 Q. Do you keep track of why you're
6 withdrawing the money? If you withdraw cash, do
7 you write down -- keep track of why?

8 A. Yeah. Yeah.

9 Q. Okay.

10 (DEPO. EXH. 6, Copies of Withdrawals, was
11 marked for identification.)

12 BY MS. HEYWARD:

13 Q. All right. This is Plaintiff's Exhibit 6.
14 I've just pulled some examples of some withdrawals
15 from the MSPS Bank of America account. The first
16 amount on page 1 is for \$366.55. Do you recognize
17 that document?

18 A. No.

19 Q. Is that your signature?

20 A. Yes.

21 Q. Would that be something you would normally
22 withdraw, that amount?

23 A. No. That's so weird.

24 Q. That's weird?

25 A. Yeah.

1 Q. Would there be any way for you to
2 determine what that was for?

3 A. I would have to go back and -- what was
4 it, '14 -- into my accounting and see what it was.

5 Q. What kind of accounting are you referring
6 to?

7 A. QuickBooks.

8 Q. You have QuickBooks?

9 A. Yes.

10 Q. Have you provided a copy of your
11 QuickBooks accounting to your lawyer?

12 A. No.

13 Q. Would you be willing to do that? Would
14 you please provide that to your lawyer?

15 A. I will have to discuss this with my
16 lawyer.

17 Q. Okay. But you could if I asked you for
18 it?

19 A. Yeah.

20 Q. Okay. Flip to the second page. Is it
21 unusual for you to withdraw \$25,000 from the MSPS
22 corporate account?

23 A. That's not a withdrawal.

24 Q. What is that?

25 A. That's a deposit, a cash deposit, I think.

1 No, never would I withdraw that much cash from the
2 business account. That's a cash deposit.

3 Q. Okay. Explain that to me.

4 A. That's what my wife told you that we have
5 the -- when I go home and say, hey, I need to pay
6 bills, bills are due, give me money, and she give
7 me however much I tell her to give me.

8 Q. So this is --

9 A. Yeah, that's a deposit. That's a cash
10 deposit. That was -- yeah.

11 MR. BURNEY: Let me interrupt you. You
12 said a cash --

13 THE WITNESS: A deposit.

14 MR. BURNEY: Spell that for me.

15 THE WITNESS: D-E-P-O-S-I-T.

16 MR. BURNEY: Okay.

17 BY MS. HEYWARD:

18 Q. Deposit.

19 A. Oh, deposit.

20 Q. Okay. I thought you said deficit. I'm
21 sorry.

22 A. Deposit.

23 Q. Okay. So this is one of the cash deposits
24 into the account?

25 A. Yeah.

1 Q. And you believe this comes from your First
2 Citizens account?

3 A. That money was cash, so it was -- no. I
4 don't know. It must come from my house, you know,
5 where we keep cash as my wife figured out.

6 Q. Okay. What did you need in October of
7 last year \$25,000 for?

8 A. To pay bills.

9 Q. What kind of --

10 A. Company bills.

11 Q. What kind of bills?

12 A. Material, steel since some companies -- my
13 suppliers don't want to make -- write checks
14 with -- like China Construction would be one. They
15 refuse to make joint checks with China Construction
16 due to the reputation.

17 So then I have to pay those suppliers with
18 my money instead of what I like to do on bigger
19 projects like this one was joint check with the
20 general contractor, but my suppliers all refuse to
21 do that with China Construction due to their
22 reputation.

23 Q. Okay. So would your QuickBooks account
24 reflect where this money went?

25 A. Yeah.

1 Q. Would the QuickBooks account reflect the
2 deposit?

3 A. Yeah.

4 Q. All right. Is that also what the next
5 page is, \$550?

6 A. Now you're testing my memory. Again, it
7 will be -- and I don't even -- 550 would not be a
8 cash deposit.

9 Q. These are just some examples. I know that
10 you probably don't remember the specifics of it and
11 that's okay. I'm just trying to understand what
12 they are.

13 A. Yeah, yeah.

14 Q. So this would be a cash deposit?

15 A. Probably, yes.

16 Q. Okay. Have you purchased or sold any
17 company equipment since June?

18 A. No.

19 Q. Have you made any more loans to the
20 company since June?

21 A. Loans?

22 Q. Loans.

23 A. I would have to check, but I think I
24 needed some money in July.

25 Q. By you need money, do you mean the company

1 needed money?

2 A. The company, yeah, sorry, the company
3 needed money.

4 Q. How much money did the company need?

5 A. I need to check before I say something
6 wrong.

7 Q. Where would you -- where would you check
8 to find out?

9 A. In my accounting, in my QuickBooks.

10 Q. In your QuickBooks account?

11 A. Or in the bank's --

12 Q. Okay.

13 A. -- statement.

14 Q. Does MSPS have a board of directors?

15 A. No.

16 Q. No. It's just you?

17 A. We are five employees.

18 Q. Do you file annual reports?

19 A. Board of directors costs money normally.

20 Q. Right. Do you file annual reports with
21 the Secretary of State?

22 A. No.

23 Q. No.

24 Do you have any officers?

25 A. Me.

1 Q. You.

2 Do you ever pay yourself dividends?

3 A. No.

4 Q. No.

5 A. I'm trying to get my loan paid.

6 Q. Does MSPS have a credit card account at
7 Lowe's?

8 A. Yeah, as I said at court already, yes.

9 Q. Does MSPS have a BMW Bank of America
10 credit card account?

11 A. BMW credit card account, yes.

12 Q. And you make the payments on that account
13 with a check?

14 A. To that --

15 Q. On the Bank of America BMW account, how --

16 A. I have a BMW credit card.

17 Q. Right.

18 A. Is that with Bank of America? I don't
19 know.

20 Q. I thought it was with Bank of America.

21 A. No.

22 Q. I could be wrong.

23 A. No.

24 Q. The BMW credit card?

25 A. Yeah.

1 Q. That's a company credit card?

2 A. That is -- it says my name on there. It
3 says Manfred Sprenger. Well, let me see to make
4 sure. Manfred Sprenger. So it's mine.

5 Q. It's yours individually?

6 A. Yes.

7 Q. Does the company pay that credit card off?

8 A. Yeah, because we buy a lot of material
9 with that card.

10 Q. So you use the card both individually and
11 for corporate --

12 A. No, I don't use it individually.

13 Q. Okay. But it's in your name individually?

14 A. Yes.

15 Q. Not in the company's name?

16 A. Yes.

17 Q. You only use it for corporate purposes?

18 A. Yes.

19 Q. Do you access the statements of those
20 accounts --

21 A. Yes.

22 Q. -- on that account?

23 You testified at the hearing that MSPS did
24 not pay for your personal car. Is that still
25 correct?

1 A. Yeah.

2 Q. Does MSPS pay for your auto insurance?

3 A. I think, but I'm not sure. I need to
4 check. I don't know.

5 Q. Okay. Let's go ahead and mark this as
6 Plaintiff's Exhibit Number 7.

7 (DEPO. EXH. 7, Copies of Checks, was
8 marked for identification.)

9 BY MS. HEYWARD:

10 Q. Flip to the last page.

11 A. Oh, that's not a car insurance. That is
12 a -- that is the insurance company who does our --
13 or did our liability. I think it was back then a
14 small amount for -- but I can get you the record --
15 for stored material when -- again, we come back to
16 those wonderful general contractors.

17 When I have contractors which are not
18 credit worthy with my suppliers, I have to buy the
19 steel, I fabricate it, and then I store it in my
20 yard, which happened with China Construction too.

21 And they did not need that material for
22 six months due to their internal screw-up of
23 employees, that all drawings were wrong, everything
24 was messed up, and that's when I need to show them
25 that -- an insurance which is called stored

1 material insurance.

2 Q. Okay. So this auto owner's insurance --

3 A. Yeah.

4 Q. -- is --

5 A. They do something to that. I think that's
6 what that is.

7 Q. Okay. Does MSPS have an account with Mass
8 Mutual?

9 A. Who?

10 Q. Mass Mutual.

11 A. What is that?

12 Q. It's a financial company like you might
13 get --

14 A. Again, I know there is different companies
15 out there who offer different services, but there
16 is no investment account, if you're asking that,
17 with a Mass Mutual.

18 Q. Right. Well, there's certainly regular
19 payment to Mass Mutual?

20 A. Oh, yeah. See, then it's probably a --
21 it's either my liability or my workers' comp
22 insurance.

23 Q. Can you find out for me?

24 A. I certainly can.

25 Q. And could you pull any kind of documents

1 reflecting any insurance agreement that you have
2 with Mass Mutual --

3 A. Yeah.

4 Q. -- if I asked you to?

5 A. Yeah.

6 MR. BURNEY: Can I interrupt? When you
7 say you when you answer her questions, make sure
8 you differentiate between you personally and you as
9 your company.

10 THE WITNESS: If I say for me, it's -- me
11 is the company and the company's me. It's a small
12 business.

13 BY MS. HEYWARD:

14 Q. I understand. Just for the record, I'm
15 asking about company accounts, company insurance.

16 A. Company account with Mass Mutual, yes.

17 Q. Right. Okay.

18 A. I think -- well, I think there's also a
19 life insurance policy with Mass Mutual -- I don't
20 know who they are called because the small business
21 loans, one of their conditions is that you have to
22 have a life insurance policy in their name. So
23 that could be that, but --

24 Q. That could be that, okay.

25 All right. I'm going to list some

1 individuals, and I need you to tell me who they
2 are.

3 A. Okay.

4 Q. Keith Gibson?

5 A. A former employee.

6 Q. When did he leave MSPS?

7 A. July last year, I think.

8 Q. What did he do for the company?

9 A. What did he what?

10 Q. What did he do for the company?

11 A. He was a steel fabricator.

12 Q. Shane Gibson?

13 A. His son. He worked for me for a while.

14 Q. When did he work for MSPS?

15 A. I think he was there twice, one time in
16 '13, end of '13, and then in spring of '14 again.

17 Q. John Ziegler?

18 A. Same, he worked for me, painter, helper.

19 Q. Curt Henson?

20 A. Former employee, fabricator.

21 Q. Kevin Sprenger?

22 A. Current employee, son.

23 Q. Marco Sprenger?

24 A. Current employee, son.

25 Q. Diana Sprenger?

1 A. Current employee, daughter.

2 Q. Edward Gibson?

3 A. Who?

4 Q. Edward Gibson.

5 A. I need to check if he was.

6 Q. That's fine.

7 A. It's probably the other -- Keith Gibson's
8 other son. I think he was there for one or two
9 days, so I am not sure.

10 Q. Marcell Sprenger?

11 A. Son. Not employed anymore.

12 Q. Daryl Terry?

13 A. Daryl Terry. Daryl Terry. I don't know.
14 That doesn't sound familiar that name.

15 Q. Ronnie Lee?

16 A. Who?

17 Q. Ronnie Lee.

18 A. Ronnie Lee.

19 Q. No?

20 A. No.

21 Q. That's okay if you don't remember.

22 Joseph Bryant?

23 A. No.

24 Q. Brian F. Duckett?

25 A. No. Well, no.

1 Q. You don't remember who that is?

2 A. No.

3 Q. Nathanie Paul Bishop?

4 A. No.

5 Q. Christopher Corbett?

6 A. Chris Corbett.

7 Q. You don't --

8 A. I don't recall.

9 Q. Okay. I just wanted to get it for the
10 record.

11 A. Oh, yeah, yeah, yeah, I know. I'm
12 supposed to say yes or no. Sorry. I don't recall
13 those names. I really don't.

14 Q. Okay. Robert States?

15 A. Robert States? No.

16 Q. And Jimmy Fowler?

17 A. Jimmy Fowler, no.

18 Q. You don't recall, okay.

19 All right. I've got some companies listed
20 here to which it appears MS Production Solution
21 writes checks regularly.

22 A. Okay.

23 Q. I just want to establish for what purpose.

24 A. Okay.

25 Q. LDI Reproprinting Center?

1 A. They print my shop drawings and big
2 documents.

3 Q. Okay. BB&T Financial, why do you write
4 checks to them?

5 A. Oh, that's a long story. That's 2012 I
6 believe or '11. I had another wonderful general
7 contractor like China Construction. They elected
8 not to pay me \$550,000. The last check they wrote
9 me was -- and I used to be until January of 2012 --
10 '11 -- no, '12 with BB&T, and they gave me the last
11 check -- well, just to back up for a little bit.

12 That's how general contractors work. They
13 made me work overtime during Christmas, and me and
14 my wife went to there and even painted and loaded
15 trucks during Christmas holidays just to get them
16 on time to their job site. The last truck arrived
17 January 12th. I remember that because 9th is my
18 birthday.

19 They get -- they paid that check a week
20 before. When the last truck arrived, they
21 cancelled the contract, and since they were also
22 affiliated with BB&T, they told bank of -- BB&T to
23 pull that money back. That's how wonderful
24 companies are. So they pulled that last check they
25 owed me or they paid me back out of my BB&T

1 account.

2 Q. You have a BB&T account?

3 A. I had. It's closed. It's done.

4 Q. When was it closed?

5 A. 2012.

6 MR. BURNEY: Is that you or --

7 THE WITNESS: The company. Sorry. The
8 company.

9 BY MS. HEYWARD:

10 Q. The company had a BB&T account?

11 A. The company, yeah. So that is -- after
12 the BB&T did that, I obviously said that's not
13 acceptable because my checks started to bounce I
14 paid to suppliers. I had suppliers call me. And
15 here is a general contractor, and I think you --
16 maybe you recall in court I mentioned that.

17 Q. I do recall that.

18 A. There's a general contractor walking away
19 with \$550,000 of my money.

20 Q. So I should not see any of the checks to
21 BB&T after 2012?

22 A. No.

23 Q. Would you be able to explain why there are
24 checks after 2012?

25 A. To BB&T? That is to that credit card. I

1 still make payments on that card. That's a credit
2 card. It's a -- it's a card, an overdraft card,
3 which used to be back then, and just keep paying
4 monthly back to them.

5 Q. So you do have an account with BB&T --

6 A. Bank card, yes.

7 Q. The company --

8 A. Yes.

9 Q. -- has an account with BB&T Financial, an
10 overdraft protection account --

11 A. Yes.

12 Q. -- card?

13 A. Yes, a card --

14 Q. Do you --

15 A. -- which you will not see any money being
16 withdrawn from that account. You will see just
17 monthly payments going in.

18 Q. Okay.

19 A. And I think the balance is \$6,000.

20 Q. I'm going to skip over some of these.

21 Does the company have a Home Depot credit
22 card?

23 A. Uh-huh. Yes.

24 Q. What is BJ Design Services?

25 A. That's a detailing company out of Texas I

1 use to have drawings made.

2 Q. What is The Hartford?

3 A. Hartford is an insurance company. It's --
4 I think it's liability or workers' comp. It's
5 just -- it's one of those.

6 Q. Do you have multiple workers' comp
7 insurance policies?

8 A. No. They change every year.

9 Q. Okay.

10 A. So whatever my broker -- the least
11 expensive one. That's why those names change.

12 Q. What about First Bank, why are there
13 payments to First Bank?

14 A. That's a small business loan.

15 Q. That is a small business loan?

16 A. Yes.

17 Q. Any other reason?

18 A. No.

19 Q. Malone Plumbing, do you use a plumber on
20 your jobs?

21 A. No, but when -- you know, sometimes at my
22 work toilets clog up too.

23 Q. Okay. So that's maintenance?

24 A. Yes.

25 Q. Okay.

1 A. I can tell my employees to use the
2 backyard would be a solution.

3 Q. All right. At the hearing in June, you
4 testified that you were currently working on a
5 movie theater in Augusta?

6 A. Uh-huh.

7 Q. Do you recall that?

8 A. Uh-huh.

9 Q. Is that a yes?

10 A. Yes. Oh, yeah. Sorry. I'm sorry.

11 Q. You also testified that that job was about
12 80 percent complete?

13 A. Yes, but we are still working on it.

14 Q. Currently you're still working on it?

15 A. Yes.

16 Q. At that time, you also testified that you
17 were owed a hundred thousand dollars --

18 A. Yes.

19 Q. -- on that job?

20 A. Yes.

21 Q. Have you been paid that hundred thousand
22 dollars?

23 A. Yes.

24 Q. You have been paid?

25 A. Yes.

1 Q. That payment would be reflected on your
2 QuickBooks?

3 A. Yes.

4 Q. Have you paid yourself any of that money
5 from the \$100,000 you --

6 A. No, other than company bills, suppliers.

7 Q. So that money should have been retained in
8 MSPS account and never left except to pay company
9 bills?

10 A. Payroll, suppliers for material and so
11 forth.

12 Q. Have you been paid anything else on that
13 job?

14 A. Yeah, the frequent payments, but as I
15 said, we should be done this month, so I think the
16 last payment is due next week and that's \$17,000,
17 but then there's an open invoice against that is
18 15,000 something.

19 Q. There's an opening?

20 A. Open invoice against those \$17,000 which I
21 should get.

22 Q. Okay. So in total how much are you owed
23 by the end of the month?

24 A. From them?

25 Q. From them.

1 A. Nothing. By the end of this month?

2 Q. Yes.

3 A. Nothing.

4 Q. Well, you just testified that you are owed
5 15,000?

6 A. 17,000. It's due this week or next week.
7 I need to verify in my books. But there's an
8 invoice against those \$17,000 of \$15,500 --

9 Q. Okay.

10 A. -- which I need to pay with those \$17,000.

11 Q. So you'll make \$2,000 -- what was your
12 profit on the job?

13 A. What it was?

14 Q. Yeah.

15 A. I need to go back and add up the numbers,
16 but it was very, very small.

17 Q. Can you guess?

18 A. Maybe 3 -- you mean gross profit or net
19 profit?

20 Q. Both.

21 A. That's too hard to guess.

22 Q. Okay.

23 A. You're asking me to guess a number
24 which -- no, it's almost impossible. The job was
25 \$500,000. Material maybe was 400,000, my payroll,

1 whatever it was, and my overhead cost. So bottom
2 line I think for me maybe 2 or \$3,000.

3 Q. Okay. Tell me about the Brevard Housing
4 Project.

5 A. That's ongoing. That's not even
6 50 percent. Again, general contractors, they have
7 in their contract to me that Manfred must supply
8 the steel by end of June and he must start erecting
9 that steel by July 4th, the day after.

10 Guess what happened? Manfred did all that
11 or MSPS. Guess what didn't happen? The general
12 contractor, as 90 percent of them, did not their
13 part. They're not ready. Not even today they are
14 ready.

15 Q. Are you owed any money on that job at this
16 time?

17 A. Owed? No. No.

18 Q. Who's the GC on the Brevard job?

19 A. Oh, my God. Brantley. Brantley
20 Construction.

21 Q. Brantley?

22 A. Brantley.

23 Q. Okay. I think I knew that.

24 When is that job scheduled to end?

25 A. I don't know. I don't know. I have no

1 idea. Your guess is as good as mine.

2 Q. Was it supposed to be finished already?

3 A. Supposed to be finished middle of August.

4 Q. Okay. How much that was contract for?

5 A. You know China Construction was eight
6 month late. You know that.

7 Q. How much was the contract for the Brevard
8 Housing Project for?

9 A. Hundred and -- hundred something, 130,000
10 I think or 111.

11 Q. Do you have a copy of that contract?

12 A. Yeah.

13 Q. You could provide it to your lawyer if I
14 asked?

15 A. I did give you that list, remember, of the
16 projects, current projects. The judge asked for
17 current.

18 MR. BURNEY: She's asking you for the
19 contract.

20 THE WITNESS: Oh, contract, no, no, no. I
21 can -- you can have it.

22 BY MS. HEYWARD:

23 Q. Okay.

24 A. I can.

25 Q. What about the hotel in West Virginia?

1 Tell me about that.

2 A. Not even started.

3 Q. Not even started.

4 Do you have any money invested in that --

5 A. Yes.

6 Q. -- project?

7 How much?

8 A. Detailing. 8, \$9,000. So now do you want
9 to buy my business?

10 Q. Leave the questions to me, Mr. Sprenger.

11 A. Okay.

12 Q. Have you invoiced for that 8 or 9,000?

13 A. Yeah.

14 Q. Have you been paid?

15 A. Yes, I did in August, yes.

16 Q. You got paid in August?

17 A. Yes, end of August.

18 Q. Not owed any more -- no other outstanding
19 invoices?

20 A. No.

21 Q. Any other new projects?

22 A. Any other new projects? Besides the
23 hotel, Brevard, there is -- what is that called?

24 Oh, I forgot. I forgot. I need to look up the

25 list what we gave you, but nothing we're working on

1 right now. Oh, Old Dock. Sorry. Yeah, I had --
2 that was on that list too. Old Dock Middle School.

3 Q. Old Dock?

4 A. Dock Middle School.

5 Q. Where is that?

6 A. North Carolina.

7 Q. How much is that contract worth?

8 A. 200,000.

9 Q. When did that project start?

10 A. Just now.

11 Q. Are you currently working on that project?

12 A. Yes, yes.

13 Q. How much money have you put into that
14 project?

15 A. All the steel, but, again, I have stored
16 material certificate again, so -- and they are good
17 contractor because they accepted joint check
18 payment, my supplier, so they are very good general
19 contractor. I have put in maybe \$50,000, 30,000,
20 in that --

21 Q. Have you invoiced for any of that?

22 A. I started to invoice now, yes.

23 Q. Are those invoices due at this time?

24 A. End of the month, beginning of next month,
25 yeah.

1 Q. How much were the invoices for?

2 A. 190.

3 Q. Okay.

4 A. 180, sorry, 180,000.

5 Q. All right. I'm going to go back and
6 discuss the withdrawal -- cash withdrawals from the
7 First Citizens account, the personal account that
8 you share with your wife.

9 Do you have any of that money in cash?

10 A. Right now on me?

11 Q. Yes.

12 A. No, no, no.

13 Q. And is it also your testimony that you
14 have \$50,000 in cash in your home?

15 A. I do not know that.

16 Q. You do not know?

17 A. I do not know that. You know, just me and
18 my wife are married since 36 years. We trust each
19 other. All our lives, joint checking accounts, not
20 as we know it is usually now these days that she
21 and he has their account. We always trusted each
22 other. When we go out, she usually pays. Might
23 look stupid for people, but she does pay. I don't.
24 I'm just not --

25 Q. Do you still have access to the cash?

1 A. Do I have?

2 Q. Do you have access to the cash?

3 A. I probably would, yeah.

4 Q. Okay.

5 A. But I never try.

6 Q. When you would ask your wife to give you
7 cash to deposit into the company account, is that
8 reflected on the general ledger what that cash was
9 for, where it went?

10 A. No. What you will see is you will see
11 that there was a cash deposit, a member equity into
12 the company, and then you will see bills being
13 paid, normal transactions.

14 Q. So the cash was deposited as member
15 equity --

16 A. Yes.

17 Q. -- into the company?

18 A. Yes.

19 Q. And then you paid company bills out of
20 that?

21 A. Yes.

22 Q. And then you repaid yourself later? Did
23 you then take -- later when the company had more
24 money, did you then put money back into -- write a
25 check to your wife?

1 A. We discussed it already, yes. When I felt
2 that I could, I wrote a check to my wife and hope
3 that we can finally pay ourselves back what we
4 borrowed the company.

5 Q. You are aware that there is a -- over a
6 \$500,000 judgment against MSPS at this time?

7 A. There is, yes.

8 Q. Right. Did you feel that the company
9 could write you a \$60,000 check in May? Did you
10 feel the company was in a position to do that
11 knowing you had a 500,000 -- \$560,000 judgment?
12 How do you determine if the company can pay you?

13 A. I just did, I guess.

14 Q. You just do?

15 A. Yeah.

16 Q. You have other judgments against you too,
17 don't you?

18 A. Do what now?

19 Q. There are other judgments against you. Is
20 that correct?

21 A. I don't know.

22 Q. You don't know?

23 A. Are there? I'm sure you do know.

24 Q. You don't know if there are judgments
25 against -- as the president of MSPS, you are not

1 aware if there are any other judgments against your
2 company?

3 A. There are, yeah.

4 Q. There are?

5 A. Yeah.

6 Q. Yet you still determined that you can pay
7 yourself out of the company account \$60,000 in May?
8 Yeah?

9 A. Uh-huh.

10 Q. You don't think that money needs to go to
11 pay those judgments?

12 A. No. The judgment was not due yet. Is it?

13 Q. Yeah, it's been --

14 A. Is it? Was I obligated?

15 MR. BURNEY: You have to answer the
16 questions.

17 THE WITNESS: Or do I have to pay small
18 business loan first? Were they not obligated to
19 get paid first?

20 BY MS. HEYWARD:

21 Q. It's not about -- first of all, I'm going
22 to ask the questions in this deposition.

23 A. Okay. All right.

24 Q. Second of all, you owe money. There is a
25 judgment against you. You owe money to China

1 Construction before you owe it to yourself. Can
2 you agree with that?

3 A. No, I don't owe it to myself. I paid MS
4 Machine Tool back what they borrowed MS Machine
5 Tool Production eight years ago.

6 Q. When you pay yourself the \$60,000 --

7 A. Yeah.

8 Q. -- is that payment going to pay off the
9 small business loan?

10 A. Is that payment going towards MS Machine
11 Tool loan which was given eight years ago?

12 Q. That wasn't my question. My question is
13 are you paying that \$60,000 -- when it goes into
14 your personal account, are you then taking that and
15 paying off the small business loan that you owe?

16 A. No, I don't.

17 Q. You don't. You spend it on yourself?

18 A. I pay that monthly.

19 Q. Right?

20 A. I don't spend it on myself. Don't make
21 accusation you don't know.

22 Q. Okay. Well, you don't pay the small
23 business loan off, right?

24 A. No. I pay it monthly. As my per -- as it
25 is customary, I pay them monthly as you just said

1 it before with First Bank.

2 Q. Okay. I think we've established that you
3 owe China a judgment amount of at least \$560,000,
4 yet you decided to pay yourself \$60,000 in
5 May after the injunction was entered in?

6 A. Yes, I did.

7 Q. And how did you determine to do that? How
8 did you determine that the company was able to do
9 that?

10 A. Well, I probably --

11 Q. You think you deserve more money than
12 China? You think you're -- you think that's how
13 this works?

14 A. No.

15 Q. Okay. I just want to check one more thing
16 and then we should be through. Just a minute.

17 All right. I'm just -- I have not marked
18 this as an exhibit. We can if we need to. I'm
19 just looking at the 2014 tax returns for MS
20 Production Solutions. It says there is a carryover
21 loss each year?

22 A. Uh-huh.

23 Q. Can you explain to me why there's a
24 carryover loss each year?

25 A. Did you hear me say that I lost \$550,000

1 to a general contractor in 2012?

2 Q. Okay. Why is there a carryover loss in
3 2011?

4 A. I don't know. You need to ask my
5 accountant that question.

6 Q. Okay. That's fine. I can do that.

7 A. Yeah.

8 Q. I just wanted to know if you had any
9 knowledge.

10 A. Uh-uh.

11 Q. All right. At this time I would like to
12 hold the deposition open in case we need to revisit
13 this issue if that's okay, Mr. Burney. And if you
14 wouldn't mind, Mr. Burney, I can write another
15 document -- request for documents.

16 MR. BURNEY: Send it to me.

17 MS. HEYWARD: Okay. I'll do that. All
18 right. Well, that should conclude the deposition
19 unless you have any questions for Mr. Sprenger.

20 MR. BURNEY: Just a few.

21 EXAMINATION

22 BY MR. BURNEY:

23 Q. Mr. Sprenger, can your wife withdraw money
24 from the company account by writing checks on the
25 company account?

1 A. I don't know the banking system, how it
2 works. I guess she could.

3 Q. When she writes a check from the company,
4 is that not making a withdrawal for the person that
5 she's paying the check to?

6 A. Yeah.

7 Q. Was it uncommon for you to loan money to
8 the company to help the company's cash flow?

9 A. Oh, no, that was very common.

10 Q. In Plaintiff's Exhibit Number 3, there's a
11 check to Patricia Sprenger of \$27,000?

12 A. Uh-huh.

13 Q. Yes?

14 A. Yes.

15 Q. Does that represent a payment back to you
16 for money that you lent the company?

17 A. Yes.

18 Q. And the money that you lent the company,
19 that was not the original \$350,000, was it?

20 A. No.

21 Q. Was that \$27,000 payment back to you for
22 money that you lent the company to help the
23 company's cash flow?

24 A. Yes.

25 Q. Again, Plaintiff's Exhibit Number 3,

1 there's a check to Patricia Sprenger of \$70,000.

2 Do you see that?

3 A. Yeah.

4 Q. Does that represent money that you had
5 previously lent the company to help the company's
6 cash flow?

7 A. Uh-huh.

8 Q. Is that a yes?

9 A. Yes.

10 Q. There's also a check for \$60,000 from MS
11 Production Solutions, LLC --

12 A. Yes.

13 Q. -- to Patricia Sprenger. Does that
14 represent money that you personally lent MS
15 Production to help --

16 A. Yes.

17 Q. -- with the company cash flow?

18 You stated that -- you said anything that
19 MSPS paid you over \$350,000 was profit was a
20 statement you made. Explain that to me.

21 A. Well, it was in the discussion we had
22 because I guess she was say -- she was making a
23 statement if I add all those payments from MSPS to
24 you, that would be -- meet the \$350,000, and
25 everything above -- and then I just said, well, I

1 guess that could be considered profit. That was
2 just a -- I haven't gotten paid the \$350,000.

3 Q. So you have not been paid the 350,000?

4 A. No.

5 Q. Okay. The money that you received from
6 MSPS --

7 A. I made that statement with her that if she
8 would add up how many checks have been written to
9 me from MSPS or my wife from MSPS Production
10 Solution and add up how much money from me or my
11 wife went back into MS Production Solution, it
12 would be astonishing.

13 Q. So the money that MS Production writes to
14 you is either a repayment of money that you pay to
15 help cash flow or part of your salary?

16 A. Yeah.

17 Q. All right. You also said that there was a
18 payment to some company for your liability and
19 workers' comp. When you said --

20 A. Not mine. It's MS Production's liability
21 and workers' comp.

22 Q. Has your wife done any work for your
23 company before?

24 A. Not as an employee. She helps out
25 painting as I said before.

1 Q. Does she do any book work?

2 A. No.

3 Q. Does she ever clean the company?

4 A. She does clean, yeah.

5 Q. That's all I have. Thank you.

6 REEXAMINATION

7 BY MS. HEYWARD:

8 Q. I just have one more question just for
9 completeness. The company is still operating as a
10 business. Is that correct?

11 A. Uh-huh. Yes.

12 Q. And you haven't filed for bankruptcy or
13 anything since June?

14 A. No.

15 Q. Okay.

16 (The deposition concluded at 12:10 p.m.)

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1 CERTIFICATE OF REPORTER

2
3 I, Gina M. Johnson, Registered Professional
4 Reporter and Notary Public for the State of South
Carolina at Large, do hereby certify:

5 That the foregoing deposition was taken
6 before me on the date and at the time and location
7 stated on page 1 of this transcript; that the
8 deponent was duly sworn to testify to the truth,
9 the whole truth and nothing but the truth; that the
10 testimony of the deponent and all objections made
11 at the time of the examination were recorded
stenographically by me and were thereafter
transcribed; that the foregoing deposition as typed
is a true, accurate and complete record of the
testimony of the deponent and of all objections
made at the time of the examination to the best of
my ability.

12 I further certify that I am neither related
13 to nor counsel for any party to the cause pending
or interested in the events thereof.

14 Witness my hand, I have hereunto affixed my
15 official seal this 21st day of September, 2015, at
Columbia, Richland County, South Carolina.

16
17
18
19 Gina M. Johnson
20 Gina M. Johnson
21 RPR, CSR, Notary Public,
22 State of South Carolina
at Large.
My Commission expires
October 1, 2023.

I N D E X

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Stipulation

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4

EXAMINATION

BY MS. HEYWARD

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BY MR. BURNEY

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REEXAMINATION

BY MS. HEYWARD

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Certificate of Reporter

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E X H I B I T S

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Plaintiffs'

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5 Rule to Show Cause and Order of
Reference

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14

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6 Copies of Withdrawals

19

16

7 Copies of Checks

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1 STATE OF SOUTH CAROLINA

COURT OF COMMON PLEAS

2 COUNTY OF GREENVILLE

3
4 CHINA CONSTRUCTION AMERICA
5 OF SOUTH CAROLINA, INC.,

6 Plaintiffs,

Case No.: 2014-CP-23-1871

7 vs

8 MS PRODUCTION SOLUTIONS LLC
a/k/a MSPS STEEL FABRICATORS,

9 Defendants.

10 D E P O S I T I O N

11 WITNESS: PATRICIA SPRENGER

12 DATE: Monday, September 21, 2015

13 TIME: 9:59 a.m.

14 LOCATION: Law Offices of
15 Turner & Burney, P.C.
16 628 NE Main Street
Simpsonville, South Carolina

17 TAKEN BY: Attorneys for the Plaintiffs

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19 Certified Shorthand Reporter
Registered Professional Reporter

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Lexington, SC 29072
803-359-5705

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5 BY: CAITLIN CRESWICK HEYWARD, ESQ.
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7
8 ATTORNEYS FOR DEFENDANT
MS PRODUCTION SOLUTIONS LLC a/k/a MSPS
STEEL FABRICATORS:

9 TURNER & BURNEY, P.C.
10 BY: RHETT D. BURNEY, ESQ.
628 NE Main Street
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12
13 ALSO PRESENT:

14 CAROLA ROBBINS, INTERPRETER
15 MANFRED SPRENGER

16 (INDEX AT REAR OF TRANSCRIPT)
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1 CAROLA ROBBINS, being first duly
2 sworn, testified as follows:

3 EXAMINATION

4 BY MS. HEYWARD:

5 Q. Good morning. I'm going to start off by
6 asking Ms. Robbins some questions before we get
7 into Patricia's testimony today.

8 (DEPO. EXH. 1, Resume, was marked for
9 identification.)

10 BY MS. HEYWARD:

11 Q. As Plaintiff's Exhibit 1, I want to
12 introduce into the record a copy of Ms. Robbins'
13 CV.

14 Ms. Robbins, do you have any particular
15 training or credentials as an interpreter?

16 A. Yes, I do. I went to the SDI college in
17 Munich, which is the most renowned college for
18 interpretation in Europe, and I got my degree in
19 translation and interpretation there, and I
20 graduated in 2008.

21 Q. In what languages?

22 A. English --

23 Q. English.

24 A. -- and German.

25 Q. And what is your native language?

1 A. German.

2 Q. How did -- and that's how you learned
3 English or when did you start learning English?

4 A. I started learning English at the age of
5 ten in school, normal elementary and then our -- in
6 our German school system.

7 Q. Okay.

8 A. So I've been learning English for about 30
9 years now.

10 Q. How long did you spend in Germany and how
11 long did you spend in the United States?

12 A. I spent -- before I first came to the
13 states, I went 28 years in Germany, and with my
14 husband being a retired Air Force, we moved to the
15 States because he wanted to live in his own state
16 for a while, his native state of South Carolina.
17 So we started building a home. And then at the age
18 of 31, I came over here permanently. So I spent
19 about 30 years of my life in Germany and almost ten
20 in the United States.

21 Q. Okay. How many times have you interpreted
22 in court?

23 A. In court I've interpreted four times in
24 South Carolina and at depositions five times.

25 Q. In South Carolina?

1 A. Yes, ma'am.

2 Q. What about in Germany, what kind of
3 interpretation work did you do there?

4 A. I did technical translation for renewable
5 sources of energy companies, so that was more of
6 the technical side. Here in the States, it's very
7 hard because people usually speak English or they
8 find someone who speaks German and English, so
9 technical interpreters are not really required.
10 But I did not do any legal interpretation in
11 Germany.

12 Q. In Germany?

13 A. Only translation. I did translate
14 contracts and judgments, but no oral translation.

15 Q. Okay. And most of your translation in
16 Germany was in English -- to English?

17 A. Into English and out of English, but also
18 out of Spanish.

19 Q. Okay. I didn't realize you also know
20 Spanish.

21 A. I do.

22 Q. And what other kind of interpretation work
23 have you done?

24 A. This is pretty much it.

25 Q. Okay.

1 A. Well, within my family, when my husband
2 wasn't fluent or wasn't able to speak German, I had
3 to interpret back and forth between my parents and
4 my siblings -- my siblings not so much because they
5 were starting to learn then, but my mom and dad,
6 they didn't speak English very well, so if that
7 counts --

8 Q. Okay.

9 A. -- that would be --

10 Q. Okay. Are you a potential witness in this
11 case?

12 A. No, I'm not.

13 Q. Do you know or work for any of the
14 parties?

15 A. No, I don't.

16 Q. Do you have any other potential conflicts
17 of interest?

18 A. No, I do not.

19 Q. Okay. Do you recognize this document that
20 I handed you?

21 A. Yes. This is my resume.

22 Q. Is this a fair and accurate representation
23 of your resume?

24 A. Yes. This is the one I sent through
25 e-mail.

1 Q. Okay.

2 A. This is my resume.

3 MS. HEYWARD: Mr. Burney, do you have any
4 questions?

5 MR. BURNEY: No questions.

6 MS. HEYWARD: All right. So we'll go
7 ahead and get started. At this time we're going to
8 swear in Ms. Sprenger.

9 STIPULATION: It is stipulated by
10 and between Counsel that this deposition is being
11 taken in accordance with the South Carolina Rules
12 of Civil Procedure, and that the deponent does not
13 waive the right to read and sign the deposition
14 transcript.

15 - - - - -

16 PATRICIA SPRENGER, being first duly
17 sworn, testified as follows:

18 EXAMINATION

19 BY MS. HEYWARD:

20 Q. Ms. Sprenger, will you please state your
21 full name for the record?

22 A. Patricia Sprenger.

23 Q. Can you understand what I'm saying right
24 now?

25 A. The easy English, yes.

1 Q. The easy English, okay.

2 How long have you lived in the United
3 States?

4 A. 20 years now.

5 Q. 20 years?

6 A. Uh-huh.

7 Q. And you've spoken -- you've learned
8 English. Did you know it before you came to the
9 United States?

10 A. No.

11 Q. You learned it living here?

12 A. Yeah.

13 Q. Okay. If we don't need the interpreter to
14 interpret what I'm saying, we can just proceed with
15 the deposition. If you need help, just indicate
16 that to me or to Ms. Robbins and she will
17 interpret --

18 A. Okay.

19 Q. -- the questions that I ask you.

20 Have you ever had your deposition taken
21 before?

22 A. No.

23 Q. If you can answer all of my questions in
24 the affirmative, yes or no. This is our court
25 reporter. She's taking everything down. So it

1 will be in a readable format, so uh-huh or uh-uh
2 will not translate into the transcript. I need a
3 yes-or-no answer from you. If you don't know the
4 answer to a question, I don't know is also okay.

5 If you need a break, please let me know.
6 I'll tell you that we've got two pregnant women in
7 the room right now, so we will not go more than 45
8 minutes without taking a bathroom break. Hopefully
9 this deposition will not last very long.

10 But if you need clarification of any of my
11 questions, please ask me. Do not ask your
12 attorney. The Rules of Evidence and the Rules of
13 Civil Procedure provide that when we take a break,
14 you are not allowed to discuss your testimony with
15 Mr. Burney. You can talk to him about the weather,
16 about how your garden's doing or anything like
17 that, but you cannot talk about your testimony
18 during those breaks.

19 A. Yeah.

20 Q. Do you understand why you're here today?

21 A. Yes.

22 Q. Have you had a chance to review the notice
23 of deposition that was served upon you? No?

24 A. No.

25 Q. Do you recognize this document?

1 A. No.

2 Q. You do not?

3 A. No, because this is not my business.

4 Q. Is that your name on the top, Patricia
5 Sprenger?

6 A. Where's my name? Oh, yes, sorry, that's
7 my name.

8 Q. Do you recall a process server serving
9 that document upon you?

10 MR. SPRENGER: No, I was at the door.
11 Sorry.

12 THE WITNESS: No, not to me.

13 BY MS. HEYWARD:

14 Q. But you were aware that you had to appear
15 today because you are here and --

16 A. Yes, he told me. My husband told me.

17 Q. Okay. All right.

18 A. Because I can't read this stuff.

19 Q. Okay. I'll take that back. Thank you.
20 This will be Exhibit 2.

21 (DEPO. EXH. 2, Subpoena Duces Tecum in a
22 Civil Case, was marked for identification.)

23 BY MS. HEYWARD:

24 Q. Have you reviewed any documents in
25 preparation for today's deposition?

1 A. No.

2 Q. Did you bring any documents with you --

3 A. No.

4 Q. -- to the deposition?

5 Have you spoken with Mr. Burney about the
6 deposition today?

7 A. Yes.

8 Q. Did you talk about the content of what
9 your testimony would be?

10 A. I don't understand you. Sorry.

11 (The interpreter interprets the question.)

12 THE WITNESS: Yeah.

13 BY MS. HEYWARD:

14 Q. You did? Did you retain Mr. Burney as
15 your lawyer personally?

16 A. No, not me.

17 Q. Okay. What did you talk to Mr. Burney
18 about in preparation for your deposition? What was
19 the content of that conversation?

20 A. He only explained to me what was going to
21 happen during the deposition.

22 Q. Okay. So just generally the process?

23 A. Because the company does not belong to me.
24 It is none of my business.

25 Q. Well, what is your business, and we will

1 get into it, is why you're here today. We are
2 talking about some transfers that were made to you
3 personally.

4 A. I'm a homemaker.

5 Q. Okay. We'll get there.

6 All right. Mr. Sprenger testified in
7 court back in June that you have never worked for
8 MSPS. Is that correct?

9 A. I go only sometimes in for cleaning the
10 business and put things on paper in folders. This
11 is all what I do sometimes, not there often.

12 Q. Okay. So you're not an employee of MSPS?

13 A. No, I'm not.

14 Q. You have never been an employee of MSPS?

15 A. No, I've never been.

16 Q. You've never been paid as an employee of
17 MSPS?

18 A. No, I never get money.

19 Q. Okay. You never had a W2 --

20 A. No.

21 Q. -- with MSPS?

22 A. No.

23 Q. Okay. Do you have access to the MSPS
24 business account, checking account?

25 A. Only I can sign checks, but I don't know

1 what is going on. It's a business account.

2 Q. So you have authority to write checks out
3 of the business account?

4 A. I can sign the paychecks when he's out of
5 town.

6 Q. Okay.

7 A. Otherwise, no.

8 Q. You do that as a nonemployee of the
9 company?

10 A. Yes.

11 Q. Okay.

12 A. I'm on the account for signing.

13 Q. Okay. Do you withdraw money from the
14 business account?

15 A. No, never.

16 Q. Have you ever withdrawn money from the
17 business account?

18 A. Never. Never.

19 Q. Do you recall withdrawing money from the
20 business account in 2012 in the amount of \$5,000?

21 A. No.

22 Q. You do not, okay.

23 A. Not I know of.

24 Q. Would you recognize your signature if you
25 saw it?

1 A. I can recognize my signature.

2 Q. Okay. Are you familiar with this lawsuit?

3 A. Not really.

4 Q. You're not.

5 Did Mr. Sprenger tell you about this
6 lawsuit?

7 A. He told me a little bit, but this is his
8 business, and this is not my business.

9 Q. So does he tell you about his business at
10 all?

11 A. Not really.

12 Q. So he doesn't communicate if he's having
13 problems with his business to you?

14 A. He tells me when the people are not paying
15 him, but I don't know what is going on with every
16 customer or -- I don't know.

17 Q. Are you --

18 A. It's his business.

19 Q. Okay. Are you familiar with China
20 Construction?

21 A. I hear the name, but I can't tell you
22 nothing.

23 Q. Are you familiar with any financial
24 problems that MSPS has?

25 A. No, I'm not.

1 Q. Okay. Do you receive monthly payments
2 from MSPS?

3 A. No, I'm not. This is his paycheck.

4 Q. Really? Okay.

5 (DEPO. EXH. 3, Copies of Checks, was
6 marked for identification.)

7 BY MS. HEYWARD:

8 Q. I'm going to hand you a document.

9 A. Okay. Yeah.

10 Q. Do you recognize this document?

11 A. Yes, I recognize this, yes.

12 Q. Okay. And who does it say pay to the
13 order of?

14 A. It's my name.

15 Q. And is this a check made to you from MSPS?

16 A. Yes.

17 Q. Okay. .

18 A. But it's his salary. It's his paycheck or
19 what you say here when he gets his money. It's a
20 paycheck or what?

21 Q. It's your testimony that the check written
22 out to you is for salary?

23 A. Yeah, but it's not my money.

24 Q. Okay. Just to -- just as a friendly
25 reminder, our court reporter is taking down

1 everything we say.

2 A. Okay.

3 Q. So I know the tendency in normal
4 conversation is to respond and sometimes we talk
5 over each other, but for the purposes of the
6 record, so it will read clearly, I'll try and wait
7 for you to finish what you have to say if you wait
8 for me to finish what I have to say.

9 Okay. So it's your testimony today that
10 the check that's written in your name for \$7,000 --

11 A. Yes.

12 Q. -- is not actually for you, it's for your
13 husband, it's his salary?

14 A. Yes.

15 Q. Do you recall -- if you flip to the second
16 page of Exhibit 3, do you recall this check dated
17 4/28/2014 in the amount of \$7,000 made out to you
18 in your name?

19 A. Yes.

20 Q. Did you deposit that check in a bank
21 account?

22 A. I deposit this, yes, in our private
23 account.

24 Q. In your private account?

25 A. Yes.

1 Q. Okay. Do you recognize the check on
2 page 3 dated May 14, 2014?

3 A. Yes.

4 Q. That's in the amount of \$1,600, correct?

5 A. It's my name on, yes.

6 Q. Right. Do you know why that number is
7 different than the usual \$7,000 number?

8 A. No, I don't know, no.

9 Q. You don't know why you get --

10 A. No.

11 Q. -- that money?

12 A. No.

13 Q. Okay. Flip to page 6, the sixth page of
14 that document. It's a check in the amount of
15 \$27,000 made out to you?

16 A. Yes.

17 Q. Do you recognize that document?

18 A. Yes.

19 Q. That's a check made out to you in your
20 name?

21 A. Yes.

22 Q. Which you deposited in your personal
23 account?

24 A. Yes.

25 Q. Would that be your account at First

1 Citizens?

2 A. Our account.

3 Q. It --

4 A. Our private account.

5 Q. That would be your private account at

6 First Citizens?

7 A. My husband and mine.

8 Q. It's a joint account?

9 A. Yes.

10 Q. The joint account at First Citizens?

11 A. Yeah.

12 Q. Okay. Do you have any idea why this check
13 was written?

14 A. Yes.

15 Q. Why?

16 A. He gave me the check because it was
17 easier. It's his money. When he puts his name in,
18 a lot of time he forgets signing the check, and
19 this is I say, can you put my name in? Then I
20 don't have to remember him signing the check. And
21 why he put -- gave me \$27,000, I don't know.

22 Q. You don't know?

23 A. No.

24 Q. Okay.

25 A. He says I have to put this in the bank.

1 Q. All right. Skip the next check --

2 A. Yes.

3 Q. -- which is another \$7,000 check, to the
4 following one. This is a check in the amount of
5 \$70,000 made out in your name?

6 A. Yes.

7 Q. Do you recognize this check?

8 A. Yes.

9 Q. Do you know why the number is \$70,000?

10 A. No, because he said put this in the
11 account, and then later he puts this back in his
12 business account when he needed some money.

13 Q. Is it your understanding that this was a
14 loan?

15 A. No, it's not a loan.

16 Q. Have you ever made a loan to MSPS?

17 A. No, never.

18 Q. So is your testimony that -- or explain to
19 me why he writes a \$70,000 check to you.

20 A. The same, because when he writes a check
21 for our private account or for -- then he forgets
22 signing the check, and it's easier for me. Then I
23 can sign the check, take this to our bank because
24 I'm -- I am not signing -- when he signs the check,
25 I'm not signing with his name. I'm not lying or

1 anything to the bank.

2 And it's easier for me take the check to
3 the bank because every time on the beginning I had
4 to remind him, please sign the checks, you forgot
5 signing the checks, and this is why he puts the
6 name -- my name on.

7 Q. You mentioned earlier that he puts money
8 in your joint personal account and puts it back in
9 the business account?

10 A. Yes.

11 Q. Do you know why that is?

12 A. I think when he needs money, then he puts
13 it back in the business account.

14 Q. So when he needs money, he puts money in
15 his personal account from the business account, and
16 when the business needs money, he puts money --

17 A. No, no, he's not -- when -- not -- you
18 have to help me translating this. It's too much
19 now.

20 Q. Okay. I'll break it down a little bit.

21 A. Okay.

22 Q. I'm sorry. Is it your understanding that
23 when your husband needs money in your personal
24 account, he moves it from the business account into
25 the personal account?

1 A. No, he doesn't need money for the private
2 account. I don't know why he puts money in the
3 private account from the business account, but it's
4 not he needs it. But I know only when he needs it
5 back to the business account, he takes it back,
6 puts it to the business account for paying his
7 bills. This is all what I know.

8 Q. So you understand that he takes money from
9 your personal account and puts it into the business
10 account?

11 A. Yeah, when he needs. He has to pay his
12 bills. It's a business account. And because the
13 other -- the people are not paying his -- the
14 bills.

15 Q. When he has to pay the company bills?

16 A. The company bills, yeah, because sometimes
17 he makes work and the people are not paying him for
18 it.

19 Q. All right. If you will please flip to the
20 last page. This is a check to you in the amount of
21 \$60,000?

22 A. Yes.

23 Q. That's dated May 27, 2015?

24 A. Yes.

25 Q. Were you aware that the Court put an

1 injunction on MSPS from transferring any assets
2 before this -- the date this check was written?

3 A. No, I don't understand.

4 Q. Do you need her to interpret that
5 question?

6 A. Yes. I don't know what she means.

7 (The interpreter interprets the question.)

8 THE WITNESS: No.

9 BY MS. HEYWARD:

10 Q. Would it surprise you to know that?

11 A. No, because I don't have to do anything
12 with the business.

13 Q. Okay. Who is Marcell Sprenger?

14 A. My son.

15 Q. Does he do any work for you personally?

16 A. Personally, no.

17 Q. So if you were to write him a check, it
18 would be -- is he an employee of MSPS?

19 A. He was --

20 Q. He was?

21 A. -- an employee, yes.

22 Q. When did he become unemployed with MSPS?

23 A. Was in April this year.

24 Q. April of this year?

25 A. Yeah, I think was April this year, yeah.

1 Q. What about Diana Sprenger?

2 A. Is my daughter.

3 Q. Is she an employee of MSPS?

4 A. Yes, she is.

5 Q. Is she still employed with MSPS?

6 A. Yes, she is.

7 Q. What about David Schemanski, do you know
8 who that is?

9 A. I think he works for the company.

10 Q. Okay. Has he ever done any work for you
11 personally?

12 A. No, no.

13 Q. Has your daughter done any work for you
14 personally?

15 A. No. What kind of work?

16 Q. I'm just asking because I have checks here
17 in which you've written from the business account
18 to these people signed by -- with your signature,
19 so I'm just trying to understand.

20 A. Can this be the salary as a paychecks?

21 Q. It could be.

22 A. Okay.

23 Q. I'm asking you.

24 A. No, she never was doing private business
25 for me.

1 Q. Okay.

2 A. Or what you want to know here?

3 Q. That is my question, yes.

4 A. Okay.

5 Q. I'm going to go back to the monthly
6 payments. Did you spend that money?

7 A. Yes.

8 Q. What did you --

9 A. We spent the money.

10 Q. You both spent the money?

11 A. Yes.

12 Q. What did you spend it on?

13 A. Like everybody, pays the bills, the
14 mortgage, the food.

15 Q. What bills did you pay?

16 A. It just -- okay. The mortgage, the power,
17 the water, the gas, the food, the cars, the -- what
18 else?

19 Q. How do you pay those bills?

20 MR. SPRENGER: With money.

21 BY MS. HEYWARD:

22 Q. Do you pay them online? Do you pay them
23 with credit card? Do you pay them with a check?

24 A. Online, checks.

25 Q. Okay. Do you pay the power bill with a

1 check?

2 A. No, online.

3 Q. You pay the power bill online?

4 A. Yes.

5 Q. Do you have records of receipts of the
6 power bills that you've paid online?

7 A. Yeah.

8 Q. You do? Yes?

9 A. Receipts?

10 Q. Yes.

11 A. Yeah, I have receipts.

12 Q. If I asked you to retrieve those, could
13 you retrieve those for me?

14 A. Yes, sure.

15 Q. What about the water bill, how do you pay
16 the water bill?

17 A. Water bill is with check.

18 Q. With a check?

19 A. Yes.

20 Q. Do you have records of those checks?

21 A. Yeah.

22 Q. If I asked you to retrieve those checks,
23 could you retrieve them --

24 A. Yes.

25 Q. -- for me?

1 A. Yes.

2 Q. The mortgage, how do you pay the mortgage?

3 A. With check.

4 Q. With a check?

5 A. Yes.

6 Q. Same, you could get those records for me?

7 A. Yes.

8 Q. What other bills?

9 A. I pay the car.

10 Q. Okay. How do you pay the car bill?

11 A. Sometimes check, sometimes online.

12 Q. And what account is that car bill with?

13 Who has -- how do you pay that?

14 A. With the private, with the First Citizens
15 account.

16 Q. The First Citizens account?

17 A. Yeah.

18 Q. Your car payment is with First Citizens?

19 A. It's not -- I pay the car from my First
20 Citizens account -- our First Citizens account.

21 Q. And then who do you pay -- who has your
22 car payment? Who do you pay?

23 A. BMW.

24 Q. BMW?

25 A. Yes.

1 Q. Okay. Is that a loan agreement that you
2 have with BMW? Do you have a financing plan?

3 A. No. What is the other name? Not --

4 MR. SPRENGER: Lease.

5 THE WITNESS: Lease.

6 BY MS. HEYWARD:

7 Q. You have a lease?

8 A. Yeah.

9 Q. So you pay your car lease?

10 A. Yes, yes.

11 Q. Okay. Do you have records of receipts of
12 that?

13 A. Yes.

14 Q. Do you only pay one car bill? Is it just
15 one car?

16 A. Yes.

17 Q. So you lease one vehicle?

18 A. We lease one vehicle, yeah.

19 Q. Okay. Do you pay for any other vehicles?

20 A. No.

21 Q. No. Do you pay for your children's
22 vehicles?

23 A. No.

24 Q. No.

25 What about the \$60,000 check that you

1 received most recently, have you spent that money?

2 A. No.

3 Q. Where is that money?

4 A. We spent some money because we had some
5 people in Germany -- people died in my family.

6 Q. Okay. Do you know where that money is?

7 A. Yes.

8 Q. Where is it?

9 A. At home some.

10 Q. How much?

11 A. I don't know exactly how much.

12 Q. Did you give the money to other people?

13 A. No.

14 Q. No. What did you use the money for? You
15 indicated that some family members died. Did you
16 use it to pay funeral expenses?

17 A. I help my mom paying, yes.

18 Q. And how much was that?

19 A. Excuse me. I -- I have to go home and
20 count everything together. Then I can tell you
21 exactly.

22 Q. Estimate for me.

23 A. It has nothing to do with the --

24 Q. It does. This is very relevant,

25 Ms. Sprenger. I understand that this is emotional

1 for you, but it is necessary that I ask you these
2 questions.

3 A. And I -- and I buy me sometimes something
4 with the money. Is this wrong?

5 Q. What do you buy with the money?

6 A. I go and get my nails and I go buy clothes
7 and go on vacation.

8 Q. Where do you vacation?

9 A. It is private where I go on vacation.

10 Q. It's not private. This is -- this is
11 information that I must ask you about.

12 A. We go to the mountains or we go on a
13 weekend somewhere.

14 Q. Where in the mountains?

15 MR. SPRENGER: Jesus Christ.

16 THE WITNESS: Uh-huh.

17 BY MS. HEYWARD:

18 Q. Ms. Sprenger, if you're not willing to
19 answer these questions, we can ask the judge to ask
20 you to answers the questions --

21 A. This will be fine.

22 Q. -- at a hearing.

23 A. I will -- we go to Asheville. We go to
24 Gatlinburg. This is - and I buy clothes for me. I
25 buy stuff for my grandkids.

1 Q. How much -- do you have any of the money
2 in cash at this time?

3 A. Yes.

4 Q. How much?

5 A. I'm not exactly sure.

6 Q. You're not exactly sure out of \$60,000 how
7 much is in cash?

8 A. I think around 50.

9 Q. 50?

10 A. Yeah.

11 Q. You have \$50,000 in cash right now?

12 A. I think, yeah.

13 Q. Is it at your home?

14 A. Yes.

15 Q. Where in your home?

16 MR. SPRENGER: We are not going to say
17 that because that's --

18 MS. HEYWARD: Excuse me. You may not
19 speak. You're not being deposed at this time.

20 THE WITNESS: In my bedroom.

21 BY MS. HEYWARD:

22 Q. In your bedroom?

23 A. Yes.

24 Q. So you've spent approximately \$10,000 of
25 the \$60,000 on other things like bills. Is that

1 correct?

2 A. Not bills. I didn't say bills. I pay my
3 bills with my --

4 Q. The 7,000?

5 A. The \$7,000, what he takes out for his work
6 at the company.

7 Q. Okay.

8 A. Because we have to pay the bills with
9 something.

10 Q. Other than the First Citizens account, do
11 you have any other bank accounts in the United
12 States?

13 A. No.

14 Q. Do you have any bank accounts outside of
15 the United States?

16 A. No.

17 Q. Do you have any private investment
18 accounts?

19 A. Me?

20 Q. Yes.

21 A. Not me.

22 Q. Personally.

23 A. I don't know, no. I don't have stuff like
24 this.

25 Q. Stock?

1 A. No.

2 Q. IRA?

3 A. What is IRA?

4 Q. An IRA, 401K?

5 A. No.

6 Q. A retirement?

7 A. No, I don't have any retirement.

8 Q. Do you have any insurance like life
9 insurance policies?

10 A. No.

11 Q. Any other kind of insurance policies?

12 A. No.

13 Q. No mutual fund?

14 A. What is mutual fund?

15 Q. You don't have a mutual fund I'm assuming.

16 You don't have any other kind of investment
17 accounts?

18 A. No.

19 Q. It's another type of investment account.

20 A. No, no.

21 Q. Do you retain Mass Mutual for any reason?

22 Do you have an account with Mass Mutual?

23 A. Me?

24 Q. Yes.

25 A. No.

1 Q. Okay. So First Citizens is your only
2 banking relationship?

3 A. It is only my banking. I don't have
4 another bank account.

5 Q. Do you loan anybody any money? Do you
6 enter into any loan transactions?

7 A. No.

8 Q. No, okay.

9 Since June 2015, has MSPS written you any
10 more checks?

11 A. June 2000 -- I think was one month he
12 didn't pay. Now, I can tell you, yes, I took
13 \$7,000 for putting in the bank account from the
14 60,000, yeah, because one month he was not paying
15 because he didn't have the money for paying.

16 Q. Okay. So from the 60,000 you -- I'm
17 sorry. Go ahead. You can finish.

18 A. Last month -- end of last month or
19 beginning of this month, he -- yeah, he paid \$7,000
20 again, but we put -- I put that money back from the
21 60,000 because he was -- he didn't have the money
22 he said.

23 Q. Since June you've received one \$7,000
24 check?

25 A. June, July, August. One or two. I

1 can't -- I have to check. I have to look up.

2 Q. Okay. Any other checks for any other
3 amount of money?

4 A. No.

5 Q. Does MSPS give you any other kind of
6 payment in the form of -- does MSPS pay your cell
7 phone bill or any of your other bills?

8 A. No. I pay all of it with this money, the
9 7,000, all bills from home.

10 Q. So that's the only kind of --

11 A. Yes, yes.

12 Q. Okay. Just for the record, I'm going to
13 finish that. I know that you know what I'm going
14 to ask.

15 But the \$7,000 checks and the checks in
16 the other amounts that we've mentioned, those are
17 the only types of contributions or payments that
18 you receive from MSPS. Is that correct?

19 A. Yes.

20 Q. Okay. Just briefly. This is Exhibit 4.

21 (DEPO. EXH. 4, Copies of Checks, was
22 marked for identification.)

23 BY MS. HEYWARD:

24 Q. Ms. Sprenger, I just handed you what I've
25 marked as Plaintiff's Exhibit Number 4. Do you

1 recognize these documents?

2 A. These are our checks what I or my husband
3 wrote.

4 Q. Okay. So these are copies of checks from
5 your joint First Citizens account. Is that
6 correct?

7 A. Yes.

8 Q. Okay. On the first page on February 4,
9 2014, the third check down, there is a check signed
10 by you to MSPS in the amount of \$6,000?

11 A. Yes.

12 Q. Explain that to me.

13 A. Because he said he needs money for paying
14 the people, the paychecks for the people who work
15 for him, and he said, please, can you write me a
16 check.

17 Q. Okay. Did you understand that to be a
18 loan?

19 A. No. Why a loan? This is money what he
20 puts in the private account, and when he needs
21 money back in the business account, then he puts it
22 back in the business account. Why is this a loan?

23 Q. It's not a loan?

24 A. No, it's not a loan.

25 Q. Okay. Is this a gift?

1 A. No, it's not a gift.

2 Q. Then what is it?

3 A. This money, this is when he puts money in
4 the private account, and he needs money back for
5 paying the paychecks for the people or paying
6 bills, then we put back or he -- sometimes he says
7 can you write me a check. Other times he writes a
8 check when he needs money in the company. Why is
9 this a loan? He puts it --

10 Q. Okay.

11 A. He puts it back in the private account,
12 and the most money's going back to the business
13 account.

14 Q. Do you expect to be paid the \$6,000 back?

15 A. No.

16 Q. No, okay.

17 A. No.

18 Q. All right. If you can go to the third
19 page, please. On April 3, 2014, there is a check,
20 second one down, it's made payable to the order of
21 cash in the amount of \$7,000?

22 A. Yes.

23 Q. Do you know where that cash is at this
24 time?

25 A. I think it's gone.

1 Q. What did you spend it on?

2 A. Sorry, I don't know. I can't remember
3 what I was doing with the money. It's over a year
4 ago.

5 Q. Is there something that can help you
6 remember?

7 A. No.

8 Q. No?

9 A. I can be -- I took this home because I
10 don't like this -- having too much money in the
11 bank. And I think later I put -- sometimes I put
12 this back when I need this in the account. Nobody
13 can tell me how much money I have to -- can take
14 out or I have to leave in the account.

15 Q. That's true. You have the right to do
16 that.

17 A. Yes.

18 Q. But I'm just trying to figure out where
19 the money is. Is it your testimony that this money
20 is in cash in your home?

21 A. No, not now anymore. This is gone, I
22 think. It's over a year.

23 Q. Okay. If you look one, two, three more
24 down, there's another one for \$6,000 made payable
25 to the order of cash?

1 A. Yeah, I think this is the same. Sometimes
2 I take out and sometimes I take back.

3 Q. Okay. 4/24/14, there's one that's
4 significantly larger in the amount of \$29,000. Do
5 you know where that money is?

6 A. I think I took this out, but then
7 sometimes he need -- put cash back in his business
8 account. When you look on his business account,
9 then you can see sometimes he puts cash back, and
10 this is when he needs it for paying because we are
11 not leaving this much money on the private account
12 because I don't trust the banks anymore.

13 Q. I understand. I'm just trying to
14 determine if that money is available in cash in
15 your home?

16 A. No, no, it's not.

17 Q. How much cash do you have in your home?

18 A. I think \$50,000 right now.

19 Q. Okay. So of the \$60,000 check that you
20 recently received, you have \$50,000 and that is the
21 entire amount of cash --

22 A. This is all what I have -- what we have at
23 home.

24 Q. Is that also your testimony in regard to
25 the first check on page 4 in the amount of

1 \$1,554.63?

2 A. Sorry, what page?

3 Q. It's the fourth page. Can you explain
4 what that is?

5 A. I can't remember. I can't read this.

6 Q. Is that your signature on the bottom
7 right?

8 A. Yes. No, I can't remember what this is,
9 and I can't read this. I don't know.

10 Q. Okay. That's fine.

11 Flip to the next page. Third check down,
12 another withdrawal for \$20,000 on November 13,
13 2014. Do you recall what you did with that money?

14 A. The most times when I had some money cash,
15 look at his account, we put money -- most money
16 back in the business account for paying bills.

17 Q. Okay. And I know this seems repetitive to
18 you, but I'm going to go through each of these, and
19 if the testimony is the same, you can tell me that.

20 A. Okay.

21 Q. Flip to the next page. I don't see
22 anything there. All right. Next one. All right.
23 Let's skip to the last page. First check, there's
24 another withdrawal, \$1,339.16. And then there's
25 another one below that, a withdrawal of \$50,000

1 just a couple of months ago, June 4, 2015. Can you
2 please explain those two checks to me? Those
3 appear to be withdrawals, not made to cash.

4 A. The 50 -- what was the other check?

5 Q. They appear to be withdrawals in cash from
6 your First Citizens account. The first one is
7 numbered 1152916 in the amount of \$1,339.16.

8 MR. SPRENGER: The first check at the top?

9 BY MS. HEYWARD:

10 Q. Yes. It appears to be a cashier's check.

11 A. I think this was he needed this for the --
12 paying the galvanizer or what is the real name?

13 MR. SPRENGER: Galvanizer.

14 THE WITNESS: Galvanizer, yes, he needed
15 money for paying the galvanizer.

16 BY MS. HEYWARD:

17 Q. That's what he told you?

18 A. Yes.

19 Q. And so that's why you took out the
20 cashier's check?

21 A. Yeah, because I think he doesn't have
22 enough in the -- in the account. When we take out,
23 we take back.

24 Q. Is there a reason why you're making all
25 these transactions in cash or cashier's check

1 rather than just writing a check to the company
2 itself?

3 A. He said the galvanizer he wants a
4 cashier's check. I don't know why.

5 Q. Okay. What about the other transactions
6 in which you withdraw money in cash for -- so that
7 he may pay the company bills, why not just write
8 MSPS a check directly?

9 A. Because I can't write the check for
10 \$50,000 from my account when I have the money cash
11 in at home. Then I don't have this on my account.

12 Q. This is a withdrawal from the --

13 A. This is withdrawal, but I think this other
14 50,000 what I have at home. The other money 50,000
15 he puts back in the account, or 60,000, what you
16 said.

17 Q. Okay. So --

18 A. I have 50,000. This is what I have at
19 home. Because every time when we have money at
20 home, he takes the money, puts this back in the
21 account, and you can see this on his business
22 account how often he puts cash back in the business
23 account or a check or from our account.

24 Q. Okay. So earlier you testified the
25 \$20,000 check written on November 13, 2014, I

1 believe it's page 5, third check down --

2 A. Sorry, I can't remember --

3 Q. You cannot remember --

4 A. -- everything.

5 Q. You can't remember what you did with
6 \$20,000 last --

7 A. I didn't spend \$20,000. This is when he
8 needs money and he puts it back in the account
9 here, and so a check -- he puts 40,000 back in the
10 account somewhere I saw this.

11 Q. So my question to you is why are you
12 withdrawing \$20,000 in cash rather than writing a
13 check to MSPS directly for \$20,000 if it's for
14 business purposes?

15 A. Yeah, because I take the cash home, and
16 since this can be months later or weeks later,
17 he'll say, I need the money back, and then I have
18 the money at home. Then I -- he takes the cash and
19 puts this back.

20 Otherwise, I have to go -- I have to go to
21 the bank, put this back in my account or our
22 account, and then he writes a check or I and puts
23 it in the business account.

24 Q. So when you withdraw the \$20,000, he
25 didn't say I need \$20,000. You withdrew it because

1 you don't like having a lot of money in the bank.

2 Is that correct?

3 A. When we have money like this in the bank,
4 we don't like having this in the account. We get
5 cash, then it's at home, and then when he needs
6 money, then he takes the cash and brings it to his
7 business account.

8 Q. Did he take the entire \$20,000 in cash
9 from you?

10 A. I don't know. A couple times he takes
11 money. I don't know exactly all the time how much.
12 One time I saw was 40,000. He wrote the check. I
13 don't know.

14 Q. Okay. So it's your testimony that you
15 don't know what happened to \$20,000 that you took
16 out in cash from your First Citizens account?

17 A. No, I said he takes the money back to the
18 account, but I don't know was it 20,000 or 18,000
19 or 15,000. I don't know the exactly sum, but I
20 know he takes the money back in the business
21 account for paying bills.

22 Q. So there could have been cash left over
23 from that \$20,000 withdrawal. Is that correct?

24 A. No, I have only -- we have only \$50,000 at
25 home. When something -- it's nothing left over.

1 We spent or he pays back in his business account.

2 Q. Okay. How much is your monthly
3 electricity bill?

4 A. Around -- depends of -- I think last
5 month's was around 250, \$60, but I can't say this
6 exactly.

7 Q. Okay. How much is your water bill
8 monthly?

9 A. The water bill, it's over \$200.

10 Q. Okay. How much is your mortgage?

11 A. The mortgage is 2200 something.

12 Q. How much is your car payment?

13 A. Around 800. I can't say exactly the --

14 Q. \$800 a month?

15 A. Yeah, near \$800, yeah.

16 Q. When is your lease up on your car? When
17 does your lease run?

18 A. We have this now for a year. I think we
19 have this for -- I think two years or two and a
20 half years.

21 Q. Okay. You testified earlier that you go
22 on vacation. How much money do you spend to go on
23 vacation?

24 A. I don't know.

25 Q. How many times have you been on vacation

1 in the last two years?

2 A. A couple times we had to go to Germany
3 because our parents died.

4 Q. And how long were you in Germany?

5 A. The last time when I was was in January.
6 I think I was two weeks over when my dad died.

7 Q. You were there for two weeks?

8 A. Around.

9 MR. SPRENGER: Quit it now.

10 THE WITNESS: Be quiet. I can handle
11 this.

12 MS. HEYWARD: Mr. Sprenger, I'm going to
13 direct you not to speak during the deposition.
14 You'll have your turn to speak when I take your
15 deposition.

16 BY MS. HEYWARD:

17 Q. And how much money did you spend when you
18 went over to Germany?

19 A. I don't know.

20 Q. Can you ballpark it?

21 A. What does this mean?

22 Q. Can you guess?

23 A. Guess, I think 7, \$8,000.

24 Q. How much was your plane ticket?

25 A. I don't know exactly because he books this

1 for me. I don't know because, on this time, I was
2 not thinking how much my ticket is.

3 Q. Okay. So you spent maybe 7 to \$8,000 --

4 A. Yeah, with ticket.

5 Q. -- in Germany?

6 Okay. And you went once this last year?

7 A. No, last year I -- this year I went. Last
8 year I went twice because of my dad.

9 Q. Okay. What about the year before that?

10 A. The year before -- I have to think. Was
11 this the year when your dad died?

12 MR. SPRENGER: Uh-huh.

13 THE WITNESS: I think it was the year when
14 his dad died.

15 BY MS. HEYWARD:

16 Q. 2013?

17 A. I think was 2013 or '12. I think was
18 2013.

19 Q. And how long were you in Germany?

20 A. I can't remember.

21 Q. A week?

22 A. I think a week.

23 Q. Both times?

24 A. Sometimes I'm a week or two weeks. I
25 can't remember exactly --

1 Q. Okay.

2 A. -- how many days I'm going. I have family
3 over or we have family.

4 Q. Okay. Any other major expenses in the
5 last two years? Because you've testified that your
6 bills are a couple thousand dollars in a mortgage
7 payment, a couple hundred dollars here and there
8 for electricity and for water, and then you have a
9 payment on your car, and I understand those
10 expenses add up, but I'm just trying to figure out
11 where these large numbers are coming from that are
12 withdrawn in cash, because if you subtract that, it
13 doesn't seem like there's an even money coming in,
14 money coming out.

15 A. When I count this together, I know I pay
16 my bills. I pay clothes. I have grandkids that
17 get something. I have kids. And I can go out for
18 dinner with my kids or buy something for my kids,
19 and the large amount is going back on the business
20 account. Can you look at his account, please?
21 Then you can see where the money's going back.

22 Q. I have looked at his account,
23 Ms. Sprenger.

24 A. Okay. So you'll see --

25 Q. I'm just trying to understand. I

1 understand --

2 A. I can't say because I can count and I --

3 Q. I understand this is difficult for you,
4 and I appreciate you being here, but I have to ask
5 these questions.

6 A. This is okay, and I can give the answers
7 only what I know. I tell you the money is we
8 taking out and putting back.

9 Q. Okay. Do you pay for your clothes and
10 when you go out to eat and things for your
11 grandchildren, is all of that paid for in cash?

12 A. Or I take the debit card.

13 Q. From the First Citizens?

14 A. From the First Citizens.

15 Q. Okay.

16 A. Or the cash. Most I like paying cash
17 because I'm German.

18 Q. And Mr. Sprenger did not -- or did
19 Mr. Sprenger tell you why he was writing you the
20 check for \$60,000?

21 A. No.

22 Q. Okay. Please answer any questions
23 Mr. Burney has.

24 MR. BURNEY: I have none.

25 MS. HEYWARD: Thank you.

1 (Off-the-record discussion.)

2 MS. HEYWARD: If we can just go back on
3 the record briefly. Mr. Burney, I would like to
4 hold this deposition open pending continued
5 discovery. We may need to come back and question
6 Ms. Sprenger again regarding --

7 MR. BURNEY: Okay.

8 MS. HEYWARD: -- where the cash is. Thank
9 you.

10 (The deposition concluded at 10:54 a.m.)

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SIGNATURE OF DEPONENT

I, the undersigned, PATRICIA SPRENGER, do hereby certify that I have read the foregoing deposition and find it to be a true and accurate transcription of my testimony, with the following corrections, if any:

	PAGE	LINE	CHANGE	REASON
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PATRICIA SPRENGER, Date

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CERTIFICATE OF REPORTER

I, Gina M. Johnson, Registered Professional Reporter and Notary Public for the State of South Carolina at Large, do hereby certify:

That the foregoing deposition was taken before me on the date and at the time and location stated on page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 21st day of September, 2015, at Columbia, Richland County, South Carolina.

Gina M. Johnson
Gina M. Johnson
RPR, CSR, Notary Public,
State of South Carolina
at Large.
My Commission expires
October 1, 2023.

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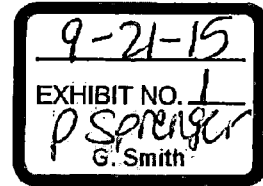
CAROLA ROBBINS, BA

172 STODDARD ROAD
PELZER, SC, 29669
USA

Phone: 864.905.6406

Email: cr@robbins-translations.com

Web: www.robbins-translations.com



OBJECTIVE

Position as a Translator / Interpreter

EDUCATION

- 2006 – 2009 NYU School for Continuing & Professional Studies
Certificate in General Translation (Major: Spanish, minor: German)
Completed six out of six required courses online to earn the certificate:
Spanish-English: Introduction Translation, Technical Translation, Commercial Translation, and Legal Translation
German-English: Patent Translation and Commercial Translation
- 2006 – 2009 Sprachen und Dolmetscher Institut (SDI) Munich, Germany
Certified Translator and Interpreter for the English Language
Specialized areas: law and engineering
BA in Translation
Completed the four-year SDI course in translation/interpreting in only two years and passed the Bavarian State Exam in July 2008 in both my specialized areas. Passing this demanding exam qualified me to earn the B.A. in Translation at SDI in January 2009 after taking additional classes in the field of professional translation and passing the written and oral BA exam. I was also required to write a 50-page thesis.
Topic of my thesis: "Business cultural differences between Germany and the U.S. from the perspective of a German expatriate in South Carolina"
- 1994 – 1996 MEA Meisinger, Aichach, Germany
On-the-job training in business
Extensive exposure to all MS Office programs, commercial correspondence, foreign trade, accounting, logistics, production processes, etc.
- 1992 – 1994 Inlingua School of Languages, Augsburg, Germany
Certified Multilingual Secretary (Native Language: German, Major: English, Minor: Spanish)
Specialized area: economics

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WORK EXPERIENCE

- | | |
|-------------|---|
| Since 2008 | Certified Translator and Interpreter for English and German (legal and technical) |
| Since 2000 | Freelance translator for technical, legal, and commercial texts from Spanish or English into German and from German or Spanish into English |
| 2006 | Burlington County College, Mount Holly, NJ
Language teacher for German and Spanish |
| 2003 – 2005 | Adult Education Center Kaiserslautern, Germany
Language teacher for English |
| 1999 – 2001 | Idiom Language Service, Aichach, Germany
Translator for technical texts from Spanish and English into German
Language teacher for English |
| 1995 – 2003 | Adult Education Center Aichach, Germany
Language teacher for English and Spanish |
| 1994 – 1996 | MEA Meisinger, Aichach, Germany
Translator for commercial correspondence from German into English
Language teacher for Spanish |

SKILLS, ABILITIES, AND QUALIFICATIONS

- Fluent in German (native language), English, and Spanish
- Completed Stage I and II of the Court Interpreter Certification Program in South Carolina
- Sworn-in at the Higher Regional Court of Munich I (which authorizes me to do certified translations for courts and public authorities in Bavaria, Germany)
- Spanish language diploma "DELE Superior" of the University of Salamanca, Spain
- ESOL Certificate of Proficiency in English (CPE) of the Cambridge University, England
- Efficient use of MS Office 2003 and 2007
- CAT Tool used: Across

CAROLA ROBBINS, BA

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Web: www.robbins-translations.com

PUBLICATIONS

- Terminology work for the dictionary "Praxiswörterbuch Fußball" published by Langenscheidt, Germany in co-operation with UEFA

REFERENCES

References and letters of recommendation are available upon request

STATE OF SOUTH CAROLINA
ISSUED BY THE COURT OF COMMON PLEAS IN THE COUNTY OF GREENVILLE

China Construction America of South Carolina,
Inc.,

Plaintiff,

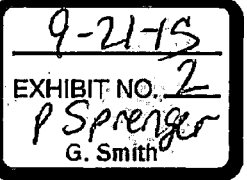
v.

MS Production Solutions, LLC a/k/a MSPS Steel
Fabricators,

Defendants

**SUBPOENA DUCES TECUM
IN A CIVIL CASE**

Case Number: 2014-CP-23-1871
Pending in Greenville County



TO: Patricia Sprenger, 308 Shagbark Circle, Simpsonville, SC 29680

☐ YOU ARE COMMANDED to appear in the above-named court at the place, date and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date and time specified below to testify at the taking of a deposition in the above case.

Kenison, Dudley & Crawford, LLC
704 E. McBee Ave.
Greenville, SC 29601

DATE AND TIME

August 19, 2015, 10:00 AM

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects in your possession, custody or control at the place, date and time specified below (list documents or objects):

ALL DOCUMENTS LISTED IN "EXHIBIT A"

PLACE

Kenison, Dudley & Crawford, LLC
704 E. McBee Ave.
Greenville, SC 29601

DATE AND TIME

August 19, 2015, 10:00 AM

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

ANY SUBPOENED ORGANIZATION NOT A PARTY TO THIS IS HEREBY DIRECTED TO RULE 30(b)(6), SOUTH CAROLINA RULE OF CIVIL PROCEDURE, TO FILE A DESIGNATION WITH THE COURT SPECIFYING ONE OR MORE OFFICERS, DIRECTORS, OR MANAGING AGENTS, OR OTHER PERSONS WHO CONSENT TO TESTIFY ON ITS BEHALF, SHALL SET FORTH, FOR EACH PERSON DESIGNATED, THE MATTERS ON WHICH HE WILL TESTIFY OR PRODUCE DOCUMENTS OR THINGS THE PERSON SO DESIGNATED TESTIFY AS TO MATTERS KNOWN OR REASONABLY AVAILABLE TO THE ORGANIZATION.

I CERTIFY THAT THE SUBPOENA IS ISSUED IN COMPLIANCE WITH RULE 45(c)(1), AND THAT NOTICE AS REQUIRED BY RULE 45(b)(1) HAS BEEN GIVEN TO ALL PARTIES.

Caitlin Heyward
Attorney/Issuing Officer's Signature
Attorney for Plaintiff

7/31/2015
Date

Caitlin Creswick Heyward
Print Name

Attorney's Address and Telephone Number:

Bruner, Powell, Wall & Mullins, LLC, Post Office Box 61110, Columbia, South Carolina 29260-1110 / (803) 252-7693

Clerk of Court/Issuing Officer's Signature

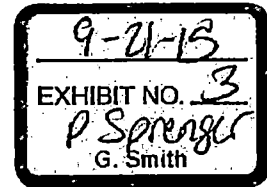
Date

Print Name

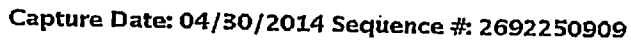
Pro Se Litigant's Name, Address and Telephone Number :

EXHIBIT A

1. List any and all account numbers for any personal bank accounts held by you and the name of the bank where each account is located.
2. Copies of all of your financial records for the last 2 years.

[illegible]

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
02/27/2014	000006700050362	53201487	-1	N		FIRST-CITIZENS BANK
02/27/2014	000006700050362	53100300	Undetermined	Y		FIRST-CITIZENS BANK
02/28/2014	002292407692	112002080	Col Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						

[illegible]

Date	Sequence
04/29/2014	000006700065340
04/29/2014	000006700065340
04/30/2014	002692250909

No Payee Endorsements Found

Bank #	Endrs Type	TRN	RRC
53201487	-1	N	
53100300	Undetermined	Y	
112002080	Col Bank	N	

Bank Name
FIRST-CITIZENS BANK
FIRST-CITIZENS BANK
BANK OF AMERICA, NA

Bank of America



Capture Date: 05/16/2014 Sequence #: 3592802278

CASH ONLY IF ALL CHECK SECURITY FEATURES LISTED ON BACK IN DATE NO TAMPERING OR COPYING

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
AIKEN, SC 29801
87-448/538

54079

5/14/2014

PAY TO THE ORDER OF Patricia Sprenger \$1,600.00

One Thousand Six Hundred and 00/100 DOLLARS

Patricia Sprenger
308 Shagbark Circle
Simpsonville SC 29680

MEMO

VOID after 90 days

ENDORSE HERE
X P. Sprenger

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

Branch 422
Sec 138
Batch 004684
Date 05/15/14

As the issuer, this check may help reduce your risk of fraud and liability.
To learn how to protect your business, call our check fraud experts at 1-800-548-0289 or visit www.fraudwatch.com

REPLICATING FORGING OR ALTERING THIS CHECK IS EXTREMELY DIFFICULT DUE TO CHECKLOCK SECURITY FEATURES

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- Toner Adhesion
- Lamper Resistant Toner Area
- Visible Fibers
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- Security Message on Back

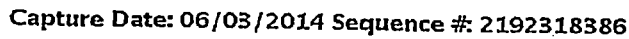
VOID after 90 days

ORIGINAL DOCUMENT

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
05/15/2014	000006700061736	53201487	-1	N		FIRST-CITIZENS BANK
05/15/2014	000006700061736	53100300	Undetermined	Y		FIRST-CITIZENS BANK
05/16/2014	003592802278	112002080	Co1 Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found



Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
06/02/2014	000006700213949	53201487	-1	N		FIRST-CITIZENS BANK
06/02/2014	000006700213949	53100300	Undetermined	Y		FIRST-CITIZENS BANK
06/03/2014	002192318386	112002080	Col Bank	N		BANK OF AMERICA, NA

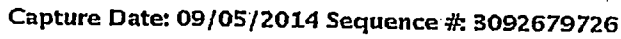
No Payee Endorsements Found

CASH ONLY IF ALL SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING
 MS Production Solutions LLC
 233 Beverly Road
 Greenville, SC 29609
 864-244-6505
 BANK OF AMERICA, NA
 Aiken, SC 29801
 803-448-5330
 54119
 6/24/2014
 PAY TO THE ORDER OF Patricia Sprenger \$ 7,000.00
 Seven Thousand and 00/100 DOLLARS
 A TAMPER RESISTANT TILDE AREA
 Patricia Sprenger
 308 Shagbark Circle
 Simpsonville SC 29680
 Valid for 90 days
 MEMO

[illegible]

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
06/25/2014	000006700035940	53201487	-1	N		FIRST-CITIZENS BANK
06/25/2014	000006700035940	53100300	Undetermined	Y		FIRST-CITIZENS BANK
06/26/2014	000192494710	112002080	Col Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found.



Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
09/04/2014	000006700207606	53201487	-1	N		FIRST-CITIZENS BANK
09/04/2014	000006700207606	53100300	Undetermined	Y		FIRST-CITIZENS BANK
09/05/2014	003092679726	112002080	Col Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						

(12)
 MS Production Solutions LLC
 233 Beverly Road
 Greenville, SC 29608
 854-244-5505
 BANK OF AMERICA, NA
 Aiken, SC 29801
 803-448-5300
 54255
 9/29/2014
 PAY TO THE ORDER OF Patricia Sprenger
 \$ 70,000.00
 Seventy Thousand and 00/100
 Patricia Sprenger
 308 Shagbark Circle
 Simpsonville SC 29680
 A TAMPER RESISTANT TONER AREA
 Valid 60 days
 MEMO

[illegible]

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
10/01/2014	000006700045269	53201487	-1	N		FIRST-CITIZENS BANK
10/01/2014	000006700045269	53100300	Undetermined	Y		FIRST-CITIZENS BANK
10/02/2014	003192670987	112002080	Col Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found-

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MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
854-244-5505

BANK OF AMERICA, NA
Aiken, SC 29801
67-449/539

54252

9/29/2014

PAY TO THE ORDER OF Patricia Sprenger

\$ 7,000.00

Seven Thousand and 00/100 DOLLARS

Patricia Sprenger
308 Shagbark Circle
Slipsonville SC 29680

MEMO

VOID AFTER 90 DAYS

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Seq: 94
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Date: 10/9/14

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- Invisible Faints
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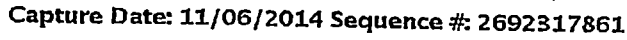
Lined and/or dated check, scratch, fold, or altered security standards.

Date	Sequence
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10/01/2014	000006700045270
10/02/2014	003192670988

No Payee Endorsements Found

Bank #	Endrs Type	TRN	RRC
53201487	-1	N	
53100300	Undetermined	Y	
112002080	Co1 Bank	N	

Bank Name
FIRST-CITIZENS BANK
FIRST-CITIZENS BANK
BANK OF AMERICA, NA.



Electronic Endorsements	
Date	Sequence
11/05/2014	000006700025956
11/05/2014	000006700025956
11/06/2014	002692317861
No Payee Endorsements Found	

[illegible]

Date	Sequence
05/29/2015	000006700066443
05/29/2015	000006700066443
06/01/2015	004092616344

No Payee Endorsements Found

Bank #	Endrs Type	TRN	RRC
53201487	-1	N	
53100300	Undetermined	Y	
112002080	Co1 Bank	N	

Bank Name
FIRST-CITIZENS BANK
FIRST-CITIZENS BANK
BANK OF AMERICA, NA

MANFRED SPRENGER
PATRICIA R SPRENGER
PH: 864-248-4750
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

01-24-14 DATE

Pay to the order of Greenville Hospital Systems \$ 100.00

One hundred and 00/100 DOLLARS

First Citizens

FOR Diana Spranger 17724508 P. Spranger

DDA Debit - (01/30/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH: 864-248-4750
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

1-23-14 DATE

Pay to the order of Carly Plumbing \$ 498.22

four hundred and ninety eight and 22/100 DOLLARS

First Citizens

FOR [Redacted] P. Spranger

DDA Debit - (01/31/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH: 864-248-4750
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

02-04-14 DATE

Pay to the order of USPS \$ 6,000.00

Six thousand and 00/100 DOLLARS

First Citizens

FOR [Redacted] P. Spranger

DDA Debit - (02/04/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH: 864-248-4750
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

02-01-14 DATE

Pay to the order of Greenville College \$ 887.00

Eight hundred and eighty seven and 00/100 DOLLARS

First Citizens

FOR 476 P. Spranger

DDA Debit - (02/05/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH: 864-248-4750
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

02-10-14 DATE

Pay to the order of Termini \$ 85.00

Eighty five and 00/100 DOLLARS

First Citizens

FOR [Redacted] P. Spranger

DDA Debit - (02/11/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH: 864-248-4750
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

02-09-14 DATE

Pay to the order of Termini \$ 75.00

Seventy five and 00/100 DOLLARS

First Citizens

FOR # 1337584 P. Spranger

DDA Debit - (02/18/2014)

CREDIT ACCT OF NAMED PAYEE 0005120446000
ENDORSEMENT GUARANTEED BY BBST CHARLOTTE INC
9053101214 03000668330 000103.00 257

(Back)

013814 3279 001509959 053223911

PAY TO THE ORDER OF
BANK OF AMERICA, NA
CREDIT ACCT OF NAMED PAYEE
0005120446000
000103.00 257

(Back)

Seq: 97
Batch: 279945
Date: 02/04/14

Seq: 00001 02/04/14
BAT: 279945 CC: 0057331700
UT: 01 LT: 05 ATTACH: 57
SC: Pine Knoll SC SC2-541

PAY TO THE ORDER OF
BANK OF AMERICA, NA
CREDIT ACCT OF NAMED PAYEE
0005120446000
000103.00 257

(Back)

BOED >053174019<
2014-02-04
867568402

Pay to the order of
Columbia Deposit Only
James C. Smith, LLC
DAA James C. Smith
2023161

(Back)

Seq: 61
Batch: 615483
Date: 02/11/14

Seq: 00001 02/11/14
BAT: 615483 CC: 0057331700
UT: 01 LT: 05 ATTACH: 57
SC: Mauldin Main Office

FOR DEPOSIT ONLY
TO THE ACCOUNT OF
TERMINX SERVICE INC.
FEB 11 2014

GREENWILL 000103.00

(Back)

02-09-14 DATE

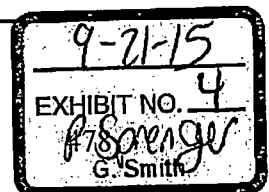
Pay to the order of Termini \$ 75.00

Seventy five and 00/100 DOLLARS

First Citizens

FOR # 1337584 P. Spranger

(Back)



PAID TO THE ORDER OF
PRINCE GEORGE BANK
GREENVILLE, SC 29607-1523
FOR DEPOSIT ONLY
H.B. HOLDINGS LLC
1066593

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 854-248-4706
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1374
02-20-14 DATE

ORDER Need Mann \$ 102.00
Paid in full 00/100 DOLLARS

First Citizens
P. Sprenger
171-1674589

DDA Debit - (02/25/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 854-248-4706
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1375
02-20-14 DATE

ORDER Byron PTA \$ 245.00
Two hundred forty five 00/100 DOLLARS

First Citizens
P. Sprenger
171-1674589

DDA Debit - (02/27/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 854-248-4706
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1376
03-01-14 DATE

ORDER Jasmine Cove \$ 887.00
eight hundred eighty seven 00/100 DOLLARS

First Citizens
P. Sprenger
171-1674589

DDA Debit - (03/04/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 854-248-4706
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1377
02-24-14 DATE

ORDER Greenville Hospital System \$ 100.00
One hundred 00/100 DOLLARS

First Citizens
P. Sprenger
171-1674589

DDA Debit - (03/05/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 854-248-4706
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1379
03-02-14 DATE

ORDER Progressive \$ 284.00
Two hundred eighty four 00/100 DOLLARS

First Citizens
P. Sprenger
171-1674589

DDA Debit - (03/10/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 854-248-4706
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1382
3-14-14 DATE

ORDER York County Tax \$ 715.36
seven hundred fifteen 00/100 DOLLARS

First Citizens
P. Sprenger
171-1674589

DDA Debit - (03/18/2014)

(Back)

>053201186<
250 Palmetto Bk #0410
2014-02-26
0410700608

6410700608

FOR DEPOSIT ONLY

(Back)

Pay to the order of
Columbia Bank, USA, N.A.
For Deposit Only
Jasmine Cove, LLC
DBA Jasmine Cove
2073161

BOED >053174019<
2014-03-03
886556004

(Back)

CREDIT ACCT OF NAMED PAYEE 0005120448000
CREDITMENT GUARANTEED BY DBST CHARLOTTE NC
>053101121< 030006665300 000100.00 213

(Back)

For >031100203< 01/07/14 - CRD-315 Project
Deposit 02/28/14 2060221
Only New Castle DE 3870035
0305 616702 074 000 616702-20-10-036 0013-007

(Back)

YORK COUNTY TREASURER
MAR 14 2014
DEPOSIT ONLY
RHT

YORK COUNTY BANK PA 01
2010317 1011 PM 01
4 0910-0001-94
3368361108

(Back)

Pay To The Order Of
SUNTRUST BANK
For Deposit Only
TOTAL PAYEE EXTENSIONS
7102013244

MANFRED SPRENGER
PATRICIA R SPRENGER
P/L 864-248-4706
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

DATE 3/22/14

Pay to Cash \$1,750.00

one hundred seventy five, 00/100

First Citizens

FOR [Signature]

DDA Debit - (03/26/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P/L 864-248-4706
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

DATE 04-03-14

Pay to Cash \$7,000.00

seven thousand 00/100

4/03/14 422040 0017 480534345809CC \$7,000.00

First Citizens

FOR [Signature]

DDA Debit - (04/03/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P/L 864-248-4706
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

DATE 03-31-14

Pay to Jasmine Cove \$887.00

eight hundred eighty seven, 00/100

First Citizens

FOR [Signature]

DDA Debit - (04/04/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P/L 864-248-4706
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

DATE 04-09-14

Pay to Greenville Hospital System \$200.00

two hundred, 00/100

First Citizens

FOR [Signature]

DDA Debit - (04/15/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P/L 864-248-4706
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

DATE 04-21-14

Pay to Cash \$6,000.00

six thousand

4/21/14 422042 0020 480534345809CC \$6,000.00

First Citizens

FOR [Signature]

DDA Debit - (04/21/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P/L 864-248-4706
300 SHADBARK CIRCLE
SIMPSONVILLE, SC 29080

DATE 04-24-14

Pay to Cash \$20,000.00

twenty thousand

4/24/14 422042 0017 480534345809CC \$20,000.00

First Citizens

FOR [Signature]

DDA Debit - (04/24/2014)

(Back)

Seq: 80924 04/03/14 Batch 4.334

Branch: 422

Seq: 24

Batch: 004394

Date: 04/03/14

(Back)

BOFD >053174019<
2014-04-03
806896810

Pay to the order of
Camille Bank 053174019
For Deposit Only
Jasmine Cove, LLP
DBA Jasmine Cove
1073161

(Back)

CREDIT ACCT OF NAMED PAYEE 00051204162000
ENDORSEMENT GUARANTEED BY BBST CHARLOTTE NC
7051011214 00000663330 000200.00 000

(Back)

Seq: 80943 04/21/14 Batch 4.518

Branch: 422

Seq: 40

Batch: 004518

Date: 04/21/14

(Back)

Seq: 80924 04/24/14 Batch 4.518

Branch: 422

Seq: 24

Batch: 004548

Date: 04/24/14

(Back)

Home (Pkg) *Sprenger* 061662
 Account No. *480534345809* DATE *5/15/14* 87404329
 PAY TO THE ORDER OF *First Citizens* \$ *1545.63*
First Citizens P. Sprenger

DDA Debit - (05/15/2014)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 240-4708
 300 SHADBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE *05-10-14*
 ORDER OF *Malone* \$ *150.00*
hundred fifty /100 DOLLARS
P. Sprenger

DDA Debit - (05/19/2014)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 240-4708
 300 SHADBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE *05-30-14*
 ORDER OF *Terminix* \$ *75.00*
seventy five /100 DOLLARS
P. Sprenger

DDA Debit - (06/03/2014)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 240-4708
 300 SHADBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE *05-30-14*
 ORDER OF *LCWSC* \$ *122.86*
one hundred twenty two /100 DOLLARS
P. Sprenger

DDA Debit - (06/05/2014)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 240-4708
 300 SHADBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE *05-31-14*
 ORDER OF *Jasmine Cove* \$ *887.00*
eight hundred eighty seven /100 DOLLARS
P. Sprenger

DDA Debit - (06/05/2014)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 240-4708
 300 SHADBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE *06-24-14*
 ORDER OF *Terminix* \$ *86.00*
eighty six /100 DOLLARS
P. Sprenger

DDA Debit - (06/27/2014)

Branch 422
 Seq: 22
 Batch: 00665
 Date: 05/15/14

(Back)

FOR DEPOSIT ONLY
 DATE: 05/15/14

(Back)

Seq: 68
 Batch: 277029
 Date: 05/19/14
 Seq: 00058 05/03/14
 BAT: 277029 CC: 0057630100
 DT: 05/19/14
 SC: Heckerle & Herlong SC SC1-381

(Back)

>053201186<
 The Palmetto Bk #0110
 2014-06-04
 0110915598

(Back)

BOFD >053174019<
 2014-06-04
 841859204

(Back)

ELECTRONICALLY PRESENTED - 6/26/2014 7

(Back)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4718
300 SHADDAK CIRCLE
SIMPSONVILLE, SC 29080

10-31-14 DATE

PAY TO THE ORDER OF Jasmine Cove \$ 572.50

Pine Bluff 50/100 DOLLARS

First Citizens

FOR 506 P. Sprenger

DDA Debit - (11/09/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4718
300 SHADDAK CIRCLE
SIMPSONVILLE, SC 29080

11-12-14 DATE

PAY TO THE ORDER OF Terminal \$ 85.00

Eighty Five 00/100 DOLLARS

First Citizens

FOR 506 P. Sprenger

DDA Debit - (11/13/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4718
300 SHADDAK CIRCLE
SIMPSONVILLE, SC 29080

11-13-14 DATE

PAY TO THE ORDER OF Cash \$ 20,000.00

Twenty Thousand 00/100 DOLLARS

11/13/14 #22091 0051 480534345809CC \$20,000.00

First Citizens

FOR 506 P. Sprenger

DDA Debit - (11/13/2014)

FIRST CITIZENS CHECKING / SAVINGS / MVA / MISCELLANEOUS DEBIT BK08

11/13/14 DATE

1079803

* 480534345809

Sprenger * 53 \$ 297.39

DDA Debit - (11/13/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4718
300 SHADDAK CIRCLE
SIMPSONVILLE, SC 29080

11-18-14 DATE

PAY TO THE ORDER OF Greenville Health System \$ 500.00

Pine Bluff 00/100 DOLLARS

First Citizens

FOR 03000418288 P. Sprenger

DDA Debit - (11/20/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4718
300 SHADDAK CIRCLE
SIMPSONVILLE, SC 29080

11-18-14 DATE

PAY TO THE ORDER OF Terminal \$ 75.00

Seventy Five 00/100 DOLLARS

First Citizens

FOR Kevin Sprenger 141060832 P. Sprenger

DDA Debit - (11/21/2014)

BOFD >053174019<
2014-11-04
812966421

Pay to the order of
Credentia Bank
For Deposit Only
Jasmine Cove, LLC
DBA Jasmine Cove
2073161

(Back)

Seq: 143
Batch: 233349
Date: 11/13/14

Branch: 422
Seq: 8
Batch: 005837
Date: 11/13/14

(Back)

Seq: 00000 11/13/14 Batch: 5, 817

Branch: 422
Seq: 9
Batch: 005840
Date: 11/13/14

(Back)

Seq: 00000 11/13/14 Batch: 5, 817

Branch: 422
Seq: 9
Batch: 005840
Date: 11/13/14

(Back)

CREDIT ACCT OF NAMED PAYEE 00051204185000
ENDORSEMENT GUARANTEED BY BBAT CHARLOTTE NC
90531011214 00020418288 000500,00 225

(Back)

Seq: 123
Batch: 584531
Date: 11/21/14

Seq: 00123 11/21/14
Batch: 584531 CC: 0037830110
WFO: LIPS: Atlanta-EL
NC: Heckle & Hartung NC SCI-181

(Back)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 804-248-4700
308 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29090

11/24/14 DATE

1518
1744328
421

PAY TO THE ORDER OF JTS Production Solution \$ 10,000.00
ten thousand 00/100

First Citizens

FOR [Signature]

DDA Debit - (11/24/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 804-248-4700
308 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29090

11-19-14 DATE

1515
1744328
421

PAY TO THE ORDER OF Dallas Ward \$ 945.88
nin hundred forty five 88/100

First Citizens

FOR 1115 P. Sprenger

DDA Debit - (11/25/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 804-248-4700
308 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29090

11-25-14 DATE

1517
1744328
421

PAY TO THE ORDER OF Greenville Hospital Systems \$ 100.00
hundred 00/100

First Citizens

FOR 1724508 P. Sprenger

DDA Debit - (12/02/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 804-248-4700
308 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29090

11-28-14 DATE

1518
1744328
421

PAY TO THE ORDER OF Jetty Henderson \$ 1,095.00
one thousand ninety five 00/100

First Citizens

FOR Port Diane Sprenger P. Sprenger

DDA Debit - (12/02/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 804-248-4700
308 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29090

12-04-14 DATE

1522
1744328
421

PAY TO THE ORDER OF Greenville Health System \$ 500.00
five hundred 00/100

First Citizens

FOR 030020418289 P. Sprenger

DDA Debit - (12/10/2014)

MANFRED SPRENGER
PATRICIA R SPRENGER
PH 804-248-4700
308 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29090

12-24-14 DATE

1525
1744328
421

PAY TO THE ORDER OF Marcell + Natic Sprenger \$ 2,000.00
two thousand 00/100

First Citizens

FOR P. Sprenger

DDA Debit - (12/26/2014)

Seq: 56
Batch: 636703
Date: 11/24/14

Seq: 88856 11/24/14
BAT: 636703 CC: 88857331700
RT: 01 LTPS: Atlanta ET
EC: Pine Knot SC 502-541

Credit to The Account Of
The Within Account
Endorsement Guaranteed
Bank of America, N.A.

(Back)

(Back)

(Back)

(Back)

(Back)

(Back)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4790
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1537
01-26-15
DATE

PAY TO THE ORDER OF Jerry Henderson \$ 1095.00
One thousand ninety five 00/100 DOLLARS

First Citizens
By Diana Sprauge P. Sprauge

DDA Debit - (02/02/2015)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4790
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1540
02-12-15
DATE

PAY TO THE ORDER OF Terminix \$ 85.00
Eighty five 00/100 DOLLARS

First Citizens
By Diana Sprauge P. Sprauge

DDA Debit - (02/13/2015)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4790
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1421
2/24/15
DATE

PAY TO THE ORDER OF H.S. Protection Solution \$ 42,000.00
forty thousand 00/100 DOLLARS

First Citizens
By Diana Sprauge P. Sprauge

DDA Debit - (02/26/2015)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4790
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1422
02-24-15
DATE

PAY TO THE ORDER OF Jerry Henderson \$ 1095.00
One thousand ninety five 00/100 DOLLARS

First Citizens
By Diana Sprauge P. Sprauge

DDA Debit - (03/02/2015)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4790
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1424
02-27-15
DATE

PAY TO THE ORDER OF Greenville Hospital Systems \$ 106.66
hundred six 66/100 DOLLARS

First Citizens
By Diana Sprauge 17724508 P. Sprauge

DDA Debit - (03/03/2015)

MANFRED SPRENGER
PATRICIA R SPRENGER
P.O. BOX 248-4790
300 SHAGBARK CIRCLE
SIMPSONVILLE, SC 29080

1425
03-27-15
DATE

PAY TO THE ORDER OF LCWSC \$ 24.64
Twenty four 64/100 DOLLARS

First Citizens
By Diana Sprauge 26577 P. Sprauge

DDA Debit - (03/04/2015)

Branch: 422
Seq: 141
Batch: 006437
Date: 02/02/15

Greenville, SC (4)

FOR DEPOSIT ONLY
TO THE ACCOUNT OF
TERMINIX SERVICE INC.
FEB 3 2015

(Back)

Seq: 107
Batch: 782319
Date: 02/13/15

Greenville, SC (4)

PAY TO THE ORDER OF
BANK OF AMERICA, N.A.
FOR DEPOSIT ONLY
US PRODUCTION SOLUTIONS LLC
2201211005

(Back)

Seq: 113
Batch: 224555
Date: 02/26/15

Greenville, SC (4)

PAY TO THE ORDER OF
BANK OF AMERICA, N.A.
FOR DEPOSIT ONLY
US PRODUCTION SOLUTIONS LLC
2201211005

(Back)

Branch: 422
Seq: 253
Batch: 006665
Date: 03/02/15

Greenville, SC (4)

FOR DEPOSIT ONLY
TO THE ACCOUNT OF
TERMINIX SERVICE INC.
FEB 3 2015

(Back)

CREDIT ACCT OF NAMED PAYEE 0005120416200
ENDORSEMENT GUARANTEED BY DDA CHARLOTTE NC
0531011214 03005656380 00010056052

(Back)

>053201186<
The Palmetto Bk #0110
2015-03-03
0110101396

Greenville, SC (4)

FOR DEPOSIT ONLY
TO THE ACCOUNT OF
TERMINIX SERVICE INC.
FEB 3 2015

(Back)

FIRST CITIZENS CHECKING / SAVINGS / MIA MISCELLANEOUS DEBIT BK08
 1152916
 THIS IS TO ADVISE THAT WE HAVE THIS DAY
 DEBITED YOUR ACCOUNT
 BY Cashier
 IN CODE P. Sprenger AMOUNT
 * 480534345809 * 53 \$ 1339.16

DDA Debit - (06/08/2015)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 245-4700
 300 SHAGBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE 06-04-15
 PAY TO THE ORDER OF Cash \$ 5000.00
 FIVE THOUSAND AND 00/100
 6/10/15 480534345809CC \$50,000.00
 First Citizens
 For: P. Sprenger

DDA Debit - (06/10/2015)

FIRST CITIZENS CHECKING / SAVINGS / MIA MISCELLANEOUS DEBIT BK08
 1189331
 THIS IS TO ADVISE THAT WE HAVE THIS DAY
 DEBITED YOUR ACCOUNT
 BY Purchase Cashier
 IN CODE P. Sprenger AMOUNT
 * 480534345809 * 53 \$ 1324.49

DDA Debit - (06/15/2015)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 245-4700
 300 SHAGBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE 06-14-15
 PAY TO THE ORDER OF Chris B. Rader \$ 600.00
 SIX HUNDRED AND 00/100
 First Citizens
 For: House Rock Hill P. Sprenger
 480534345809 01493

DDA Debit - (06/22/2015)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 245-4700
 300 SHAGBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE 06-27-15
 PAY TO THE ORDER OF Greenville County Tax Collector \$ 460.70
 FOUR HUNDRED AND 70/100
 First Citizens
 For: 1506078054801 P. Sprenger

DDA Debit - (07/01/2015)

MANFRED SPRENGER
 PATRICIA R SPRENGER
 P.O. BOX 245-4700
 300 SHAGBARK CIRCLE
 SIMPSONVILLE, SC 29080
 DATE 06-21-15
 PAY TO THE ORDER OF LCWSC \$ 142.65
 ROUNDED FOUR DOLLARS AND 65/100
 First Citizens
 For: 16577 P. Sprenger

DDA Debit - (07/01/2015)

Branch 422
 Seq: 42
 Batch: 007543
 Date: 06/08/15
 Seq: 007543 06/08/15 Batch 7,543

(Back)

Branch 422
 Seq: 41
 Batch: 007560
 Date: 06/10/15
 Seq: 007560 06/10/15 Batch 7,560

(Back)

Branch 422
 Seq: 43
 Batch: 007617
 Date: 06/15/15
 Seq: 007617 06/15/15 Batch 7,617

(Back)

Branch 422
 Seq: 43
 Batch: 007617
 Date: 06/15/15

(Back)

Branch 422
 Seq: 43
 Batch: 007617
 Date: 06/15/15

(Back)

Branch 422
 Seq: 43
 Batch: 007617
 Date: 06/15/15
 Seq: 007617 06/15/15 Batch 7,617

(Back)

FILED-CLERK OF COURT
STATE OF SOUTH CAROLINA GREENVILLE CO. S.C. IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE PAUL D. WICKENSIMMER

2015 MAY 5 PM 4 27

China Construction America
Of South Carolina, Inc.

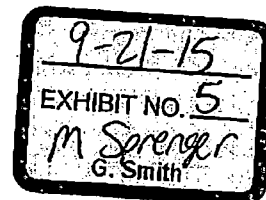
Plaintiffs,

vs.

MS Production Solutions LLC
A/k/a MSPS Steel Fabricators

Defendants.

RULE TO SHOW CAUSE AND
ORDER OF REFERENCE
(Case. NO.: 2014-CP-23-1871)



Judgment having been rendered, an Execution issued, a *Nulla Bona* return made to said Execution, the Petitioner having moved for an examination of the Respondent, pursuant to the provisions of §15-39-310, *et seq.*, as amended; it is therefore,

ORDERED that MS Production Solutions LLC a/k/a MSPS Steel Fabricators, DO APPEAR before The Honorable Charles B. Simmons, Jr., Master-In-Equity for Greenville County, Greenville County Courthouse, 305 East North Street, Courtroom 5, Greenville, South Carolina, on the 2nd day of June, 2015, at 2:30 a.m.~~a.m.~~^{p.m.}, to answer under oath concerning your assets; TO SHOW CAUSE why your property should not be applied towards satisfaction of the Judgment set out in the Petition; to SHOW CAUSE why a Receiver of Respondent's property should not be appointed, pursuant to the provisions of § 15-39-430, *et seq.* South Carolina Code Ann. (Law. Co-op. 1976).

The Master-in-Equity will entertain and rule upon all motions necessary to dispose of this

matter, to include but not limited to, motions to dismiss, motions to appoint Receiver, motions to continue the matter, and motions to sell all or certain property of judgment debtor in satisfaction of the Petitioner's debt and has authority to enter a Final Order. Any appeal from the Master-in-Equity is directly to the Supreme Court.

IT IS FURTHER ORDERED that the Respondent is hereby restrained and enjoined from making any transaction or transfer or other disposition of property belonging to him/it which is not exempt from execution pending further Order of this Court.

YOU ARE FURTHER ORDERED PRODUCE A COPY OF THE FOLLOWING DOCUMENTS TO COUNSEL FOR PLAINTIFF ON, OR BEFORE, FIVE (5) BUSINESS DAYS BEFORE THIS HEARING:

1. Bank statements for all bank accounts owned in whole or in part by Defendants for the past year.
2. Pay stubs for the past five (5) years.
3. Federal and State Tax returns for the past five (5) years.
4. Insurance Policies [home, automobile, real estate, etc...].
5. Records of any real estate owned, either in whole or in part.
6. Records of vehicles and boats.
7. Any inventories of personal property.
8. Copies of any contracts entitling you to payment of money.
9. Any personal financial statements prepared for any reasons either by your self or by any independent sources, with any applicable notes attached thereto from the past five (5) years and, if not reflected in such statements, a complete description of any and all contingent liabilities, including guarantees, by you.
10. Any and all year-end financial statements of any corporation, partnership, trust, or other business entity in which you hold directly or indirectly a 10% interest (balance sheet statements and statement of income and expenses) audited and unaudited for the last three years of the respective entities with any applicable notes attached thereto and any subsequently prepared

financial reports or statements prepared by the entity or on its behalf for any reason.

11. Any and all documents and financial records that relate to, refer to, or describe, recount, or are in any way related to any transfer of or pledge, hypothecation, gift, assignment, or granting of a security interest in assets owned or controlled by him, made by him, or on his behalf in excess of One Hundred Dollars (\$100) in any single transaction from the past five (5) years to the present, and any and all documents and financial records that relate to, refer to, to describe the disposition of proceeds, promissory notes, or other evidence of indebtedness or consideration received from such transfers, pledges, etc.
12. Any and all documents and financial records that relate to, refer to, or describe any and all transactions between him and members of his family.
13. Any and all documents and financial records, including appraisals which relate to, refer to, or describe or substantiate any valuation of assets disclosed in your financial statements/records produced under paragraph 11 above, and the manner of valuation or fixing of value of such assets, prepared either by you or by any third party or entity relating to these assets.
14. Any and all documents which relate to, or recount or describe any pending or potential claim against you or against any entity referenced in paragraph 10 above, whether or not currently in litigation, together with any and all documents which relate to, recount, or describe any judgments held against you or any entity referenced in paragraph 10.
15. Any and all documents which relate to, refer to, or describe any trust in which you are a beneficiary, including any financial statements of the aforesaid trust and the dispositive provisions of the trust as relates to you and members of your family.

IF YOU DO NOT APPEAR IT MAY RESULT IN THE APPOINTMENT OF A RECEIVER AND AWARDING THE PLAINTIFF/PETITIONER SUCH OTHER AND FURTHER RELIEF AS MAY BE REQUESTED. YOU MAY ALSO BE HELD IN CONTEMPT OF COURT, WHICH COULD RESULT IN A FINE AND/OR JAIL SENTENCE.

AND IT IS SO ORDERED.

Greenville, South Carolina

1 MAY, 2015

s/Robin B. Stilwell
Presiding Circuit Court Judge, Greenville County
STILWELL / 2158

FILED-CLERK OF COURT
 STATE OF SOUTH CAROLINA GREENVILLE COUNTY THE COURT OF COMMON PLEAS
 PAUL D. WICKENSIMMER

COUNTY OF GREENVILLE

2015 MAY 5 PM 4 27

China Construction America
 Of South Carolina, Inc.

Plaintiffs,

vs.

MS Production Solutions LLC
 A/k/a MSPS Steel Fabricators

Defendants.

**VERIFIED PETITION FOR
 SUPPLEMENTAL PROCEEDINGS**
 (Case. NO.: 2014-CP-23-1871)

PETITIONER WOULD RESPECTFULLY SHOW:

That heretofore Petitioner recovered and recorded judgment against Respondent MS Production Solutions LLC a/k/a MSPS Steel Fabricators ("Respondent") as hereinafter set forth; and that there is still due and owing on said judgment the sum indicated, Respondent having failed and refused to satisfy same:

JUDGMENT ENTERED: January 28, 2015 in Greenville County
 JUDGMENT ROLL # : 2014-CP-23-1871
 AMOUNT DUE : \$657,137.30, plus interest as accrued

1. That execution thereafter was duly issued to the Sheriff of Greenville County against Respondent and said Sheriff has returned same NULLA BONA.
2. That upon information and belief, the Respondent has assets in the County not exempt from levy which Respondent unjustly refuses to apply toward satisfaction of said judgment.
3. That Petitioner is informed and believes that it is entitled under the law and statutes to have an examination of Respondent in supplementary proceedings and to ascertain and discover any and all property and assets, real, personal, or mixed, and wheresoever situated,

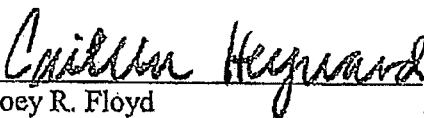
belonging to Respondent; or in which Respondent could claim any interest, solely or in conjunction with any person, firm, or corporation or entity, and any or all of which is or should be made applicable by the Court to the payment of said debt.

4. In addition, Petitioner is entitled to the appointment of a receiver of Respondent for any and all of the aforesaid property, assets, or effects which are so discovered or revealed in order to carry said judgment into effect.

WHEREFORE Petitioner prays that this court do inquire into the matters hereinabove alleged and that it issue such order or orders granting relief to which Petitioner believes it is entitled, for all expended and statutory costs allowable for this proceeding, and for such other and further relief and remedies as may be allowable and which the Court may deem proper.

And further Petitioner requests this matter be referred to the Master-in-Equity pursuant to Rule 53 of the South Carolina Rules of Civil Procedure with authority to enter a final order with any appeal being directly to the South Carolina Supreme Court.

BRUNER, POWELL, WALL & MULLINS, LLC



Joey R. Floyd

Henry P. Wall

Caitlin C. Heyward

P.O. Box 61110

Columbia, South Carolina 29260-1110

(803) 252-7693

Attorneys for Petitioner

China Construction America of South Carolina, Inc.

April 13, 2015

VERIFICATION

PERSONALLY appears Caitlin C. Heyward, who first being duly sworn, deposes and says that he is the attorney for the Petitioning judgment creditor and that he has read the foregoing Petition and knows the contents thereof and the same are true of his own knowledge except to matters alleged therein on information and belief, and as to these, he believes it to be true; that he is the attorney for the Petitioner and is authorized to make this oath on their behalf.

Caitlin Heyward
Caitlin C. Heyward
Attorney for the Petitioner

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 13 DAY OF April, 2015

L. M. War
Notary Public for South Carolina
My Commission Expires: 01/22/2018

Bank of America



Capture Date: 10/14/2014 Sequence #: 3442498489

Bank of America

☒ Checking ☐ Savings ☐ Withdrawal ☐ Debit

Please Check Proper Box.

Not Negotiable - Withdrawals are permitted only through Payment to the depositor.

Date 10.14.14

Name and Address MS Production Solution

33 Beverly Rd

Greenville SC 29609

Telephone No. 864 244 6505

Three hundred sixty six & 55/100 Dollars

Save time in line and help us avoid errors. The next time you make a withdrawal, please use your pre-printed withdrawal slips for your account.

X Customer Signature

Total Withdrawal

\$ 366.55

40-14-1075B 05-2008
For SC Use Only

ST/20 03/15
\$366.55
N CCHSCXXXXXXXXXXXX
Official Check Sale
R/T# 540570139
Account 223012111036
Entity NSC CC 7331700 TLR 00003
Trans 00152 10/14/2014 10:42

Seq: 122
Batch: 962001
Date: 10/14/14

Bank of America, N.A.
Exchanged for Cashier's Check #
Or Money Order #
110610653

Seq: 00122 10/14/14
BAT: 952031 CC: 0057331780
WT: 91 LIPS: Atlanta ET
SC: Fine Knott SC-SC2-347

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
10/14/2014	3442498489	11000138	-1	Y		BANK OF AMERICA, NA
No Payee Endorsements Found						



Bank of America



Capture Date: 10/02/2014 Sequence #: 3742827687

Bank of America

☒ **Debit** ☐ **Saving Withdrawal** ☒ **DEBIT**

Please Check Proper Box.

Not Negotiable - Withdrawals are permitted only through Payment to the depositor.

Date: 10/2/14

Name and Address: MS Production Section, Inc
233 Beverly Rd
Greenville SC 29609

Telephone No. (N/A)

Save time in line and help us avoid errors. The next time you make a withdrawal, please use your pre-printed withdrawal slips for your account.

Customer Signature: [Signature]

Total Withdrawal: 25,000.00

Seq: 264
Batch: 501831
Date: 10/02/14

Seq: B0264 10/02/14
BAT: 501831 CC: 0057331700
WT: 01 LTPS: Atlanta ET
BC: First-Knight-SC-3C2-541

Electronic Endorsements
Date Sequence Bank # Endrs Type TRN RRC Bank Name
10/02/2014 3742827687 11000138 -1 Y BANK OF AMERICA, NA
No Payee Endorsements Found

Electronic Endorsements
Date 06/19/2014 4742755725
Bank # 11000138
Endrs Type -1
RRC
Bank Name BANK OF AMERICA, NA
No Payee Endorsements Found

Bank of America

☒ Check ☐ Savings Withdrawal ☐ DEBIT

Please Check Proper Box.

Not Negotiable - Withdrawals are permitted only through Payment to the depositor.

Name and Address Manfred Sprague
233 Deverly Rd
Greenville SC 29609
Telephone No. (814) 294-6505

Date 6-19-14

five hundred fifty Dollars

Save time in line and help us avoid errors. The next time you make a withdrawal, please use your pre-printed withdrawal slips for your account.

☒ Customer Signature

Total Withdrawal \$ 550.14

For SC Use Only

40-14-3075B 05-2008

Trans 00015 06/19/2014 09:41
Entity MSC CC 7331700 TLR 00008
Account 223012111036
R/TH 540570139
Money Order Sale
DRL SCT*****
02/15 02/10

Seq: 136
Batch: 934257
Date: 06/19/14

175-25C SC SC SC2 SC2 SC2
W7:01-01-01
W7:01-01-01
W7:01-01-01

Capture Date: 06/19/2014 Sequence #: 4742755725

Bank of America



CASH ONLY IF ALL "ON/CALC" SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-8505

BANK OF AMERICA, NA
Aiken, SC 29801
67-448/539

54626

1/8/2015

PAY TO THE ORDER OF David J Schemanski \$ 293.41

Two Hundred Ninety-Three and 41/100 DOLLARS

A TAMPER RESISTANT THERMARC A

David J Schemanski
307 S Washington
Greenville, SC 28611

VOID after 90 days

MEMO Pay Period: 12/28/2014 - 01/01/2015

P. Springer

[illegible]

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
01/12/2015	2303367267	53101121	-1	Y		BRANCH BNKG AND TRUS
01/12/2015	005892379698	111012822	Pay Bank	N		BANK OF AMERICA, NA
No Payee Endorsements Found						

Bank of America



Capture Date: 01/12/2015 Sequence #: 3792600898

CASH ONLY. ALL FINANCIAL SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-5505

BANK OF AMERICA, NA
AIKEN, SC 29801
67-448/539

54627

1/8/2015

PAY TO THE ORDER OF **Diana Sprenger** \$ **598.12**

Five Hundred Ninety-Six and 12/100 DOLLARS

Diana Sprenger
10 Middlefield Court
Simpsonville, SC 29680

VOID

Pay Period: 12/26/2014 - 01/01/2015

VOID after 90 days

D. Sprenger

ENDORSE HERE
Diana Sprenger

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

Branch: 422
Seq: 101
Batch: 906270
Date: 01/09/15

As the issuer, it's your security. Plus check the fine print to reduce your risk of fraud and liability. To learn how to protect your business, call our check fraud experts at 1-800-548-0808 or visit www.fraudprevention.com

REPLICATING, FORGING OR ALTERING THIS CHECK IS EXTREMELY DIFFICULT DUE TO CHECK'S SECURITY FEATURES

SECURITY FEATURES:

- Microprint
- Color-shifting ink
- Watermark
- Heat Sensitive Ink
- Security Features of the Check
- Chemical Security Paper
- Fugitive Ink on Back
- Tamper Resistant Toner Area
- Visible Fiber
- Invisible Fiber
- VOID Indication
- Security Message on Back
- "VOID" Message
- "ORIGINAL DOCUMENT" cannot be read

VOID Indication: Security Message on Back

VOID Message: "VOID" Message

"ORIGINAL DOCUMENT" cannot be read

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
01/09/2015	000006700173664	53201487	-1	N		FIRST-CITIZENS BANK
01/09/2015	000006700173664	53100300	Undetermined	Y		FIRST-CITIZENS BANK
01/12/2015	003792600898	112002080	Co1 Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found

Bank of America



Capture Date: 01/09/2015 Sequence #: 8492486885

CASH ONLY IF ALL CHECK SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPIING

MS Production Solutions LLC
233 Beverly Road
Greenville, SC 29609
864-244-6505

BANK OF AMERICA, NA
AIKEN, SC 29801
67-448/538

54630

1/8/2015

PAY TO THE ORDER OF Marcell Sprenger \$ **1,007.37

One Thousand Seven and 37/100 DOLLARS

Marcell Sprenger
220 Meadow Blossom Way
Simpsonville, SC 29681

VOID after 60 days

MEMO Pay Period: 12/26/2014 - 01/01/2015

418-4354736

Electronic Endorsements

Date	Sequence	Bank #	Endrs Type	TRN	RRC	Bank Name
01/09/2015	000004184354736	91000019	-1	Y		WELLS FARGO BANK, NA
01/09/2015	008492486885	111012822	Pay Bank	N		BANK OF AMERICA, NA

No Payee Endorsements Found

