

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 Bruce Schultze, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 Stephen A. Brown, Individually )  
 and as manager of Pure Market )  
 Solutions, LLC, Pure Market )  
 Solutions, LLC, SLK, LLC, )  
 and John Doe, )  
 )  
 Defendants. )

IN THE COURT OF COMMON PLEAS  
 FIFTH JUDICIAL CIRCUIT

Civil Action No.: 2016-CP-40-2760

**ORDER GRANTING TEMPORARY  
 INJUNCTION**

**RECEIVED**  
 DEC 07 2017  
 SC Court of Appeals

RICHLAND COUNTY  
 FILED  
 2017 JUN 30 PM 5:27  
 JEANNETTE W. MCBRIDE  
 C.C.P. & G.S.

This matter came before the court by way of Plaintiff's motion for temporary injunction. The Plaintiff was represented by Joseph M. McCulloch and Defendants were represented by Karen Simmons. Based on the arguments of counsel and materials submitted, I find that a temporary injunction during the pendency of this case is warranted.

Specifically, it appears that immediately following the hearing on the Plaintiff's Motions for Sanctions to include striking of the answer and entering default, Defendant Stephen A. Brown – without notice to any party - sold the only known corporate asset<sup>1</sup>, an RV, on E-bay for \$15,000 although Brown himself valued the RV at \$75,000. There is no dispute that Plaintiff has an ownership interest in the RV but was not alerted to the sale. These circumstances and the history of Defendants recalcitrant and failure to produce discovery underscore the need for and justification for this temporary injunction.

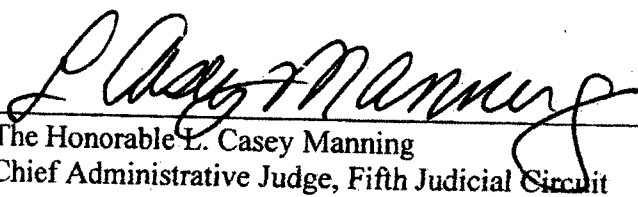
<sup>1</sup> Plaintiffs' motion for sanctions was based on Defendants' continuing refusal to meaningfully participate in the discovery process. See Order dated February 14, 2017. As such, Plaintiff has been unable to identify all assets and does not concede that the RV is the only asset.

**IT IS THEREFORE ORDERED, ADJUDGED AND DECREED:**

- 1) The Defendant was to appear in court today for purposes of the hearing, but despite notice to his counsel, Karen Simmons, through no fault to her, Defendant did not appear. As no proper excuse for his absence has been stated, Defendant is therefore found to be in contempt of court and IT IS ORDERED, Defendant Stephen Brown, shall be located immediately and placed in confinement at the Alvin S. Glenn Detention Center, 201 John Mark Dial Drive, Columbia, South Carolina, 29209, and held there until such time as Defendant can be brought before the court. This Court shall be notified immediately upon his arrest;
- 2) Defendant Brown shall within three (3) days of the signing of this Order immediately provide Plaintiff's counsel with all information concerning the sale, including but not limited to the name, address, and phone number of the buyer, information as to any furniture or other items removed from the RV prior to sale, the exact amount and whereabouts of the sale proceeds, and any business, personal, or other relationship between the buyer and Defendants;
- 3) This court further **ORDERS** that Defendant Brown shall not dispose of the proceeds of the sale (\$15,000) without prior approval of this court. Failure to comply with this Order may result in contempt of court. As it is undisputed that Plaintiff has an ownership interest in these funds, I find Plaintiff is not required to post security;

- 4) This court further **ORDERS** Defendant Brown to provide to Plaintiff's counsel, within ten (10) days of the signing of this order, a list of any and all corporate and personal assets, any and all banks or places where corporate or personal banking accounts are open or where such account has been closed within the last year, the amounts or value, the identity of persons having an ownership interest and date such ownership interest occurred, location of said assets, lien amounts attaching to any said asset, and to include any and all assets disposed of or transferred in the last thirty (30) days. This Order specifically includes Custom RV Rentals, LLC, and SLK II, LLC, and each and every other LLC or corporate entity in which Defendant has any interest, or any such entity and LLCs or accounts into which deposits were made, moneys contributed by Plaintiff, or earned by PMS, LLC;
- 5) The Court further orders Stephen A. Brown to cooperate with additional discovery efforts.

**AND IT IS SO ORDERED.**

  
The Honorable L. Casey Manning  
Chief Administrative Judge, Fifth Judicial Circuit

This 30 day of June, 2017

Columbia, South Carolina