

STATE OF SOUTH CAROLINA
In The Supreme Court

Appellate Case No. 2018-001814

APPEAL FROM SOUTH CAROLINA
COURT OF APPEALS

Appellate Case No. 2018-000823

RECEIVED

NOV 08 2018

S.C. SUPREME COURT

TARA DAWN SHURLING,

PETITIONER,

v.

JOHN DANIEL SPRINGER,

RESPONDENT.

PETITION FOR WRIT OF CERTIORARI

TARA DAWN SHURLING
Attorney and Counselor at Law
S. C. Bar No. 5099

3614 Landmark Drive, Suite A
Columbia, S. C. 29204
(803) 738-8622
(803) 738-1600 (FAX)

PRO SE PETITIONER

INDEX

Index2
Questions Presented.....3
Statement of the Case5
Argument9
Conclusion15
Certificate of Service17

QUESTIONS PRESENTED

I.

Did the Court of Common Pleas err in ruling that Petitioner's claims presented no basis for an appeal from the findings of the Fee Dispute Board in this case, pursuant to Rule 416, SCACR, Resolution of Fee Dispute Board, Rule 20(f), without any findings of fact or rulings of law addressing Petitioner's position that a hearing panel exceeds their authority where their decision is demonstrably based upon factual errors not consistent with the evidence for the panel?

II.

Did the Court of Common Pleas err in ruling that Petitioner's claims presented no basis for an appeal from the findings of the Fee Dispute Board in this case, pursuant to Rule 416, SCACR, Resolution of Fee Dispute Board, Rule 20(f), without any findings of fact or rulings of law addressing Petitioner's position that a hearing panel exceeds their authority where the panel clearly exceeded its authority in ordering Petitioner to refund to Respondent a portion of her legal fees in this case where Respondent had not paid any of her fees and was not a party to her contract with his mother, a third party payer? Issue No, 3 on appeal to the Court of Common Pleas.

III.

Did the Court of Appeals err in summarily dismissing Petitioner's Appeal from the order of the Court of Common Pleas where the issues set forth by Petitioner in her Notice of Appeal filed in the Court of Common Pleas made clear her assertion that the Fee Dispute Panel in this matter had exceeded its authority pursuant to Rule 416, SCACR, Rule 20(f) and that the Court of Common Pleas had totally failed to make appropriate findings of fact and rulings of law concerning her claims, thereby depriving her of her right to an appeal from the erroneous findings of the fee dispute panel in this case.

IV.

Did the Court of Common Pleas and the Court of Appeals err in refusing to review Petitioner's claims that the Dispute Panel in this case did not have jurisdiction to direct her to refund a portion of her fee to a third party payer, his mother, where she had not joined in Respondent's fee dispute in the manner required by the rules of Court controlling fee disputes?

V.

Did the Court of Appeals err in refusing to review Petitioner's claim that the Fee Dispute Board did not have the jurisdiction to distribute funds put in trust by Petitioner with the Bar pending her appeal be distributed to individuals who were not party to the fee dispute before the Court and where

such action was contrary to the express directives of the panel report which had previously been approved and adopted by the Fee Dispute Board?

STATEMENT OF THE CASE

This matter came before this Court by way of an appeal filed by Petitioner/ Respondent, Tara Dawn Shurling (hereafter Petitioner), from the Report and Recommendations of the three person panel assigned to the fee dispute application filed by the Respondent, John Daniel Springer (hereafter Respondent). The Report and Recommendations of that Panel were issued on December 27, 2016 following a Panel hearing held on November 17, 2017. That Panel Report is found in the Record on Appeal at pages 21-34. That Panel Report was not received by Petitioner until January 4, 2017. Petitioner made an effort to bring errors in the findings of fact, and conclusions of the Panel by submitting a Request for Reconsideration on January 19, 2017 which the Panel declined to entertain. A copy of that document is found in the APP. in this mater at pages 49-98. Correspondence and emails addressing this submission are found at APP. p. 35-60. Petitioner filed a timely Notice of Appeal from the Panel Report on February 2, 2017. See, APP. pp. 101-118. As required by the rules governing these matters, Petitioner deposited a check for the funds in dispute, \$5,000.00, in the Trust Account of the South Carolina Bar Association on that same date. APP., p. 118. While the rules governing fee disputes call for the responding agency to submit the Record on Appeal, no such record was filed by the Fee Dispute Board as required by Rule 20(e) of Rule 416, SCACR.¹ Petitioner was subsequently advised that Chief Administrative Judge L. Casey Manning, Richland County Court of Common Pleas, had directed Petitioner to file the Record on Appeal. In compliance with that directive, Petitioner prepared filed and served the Record on Appeal on all parties on August 2, 2017. See, APP. pp.

¹ After the hearing held in this appeal, Petitioner mentioned to a member of the S.C. Bar staff that no Record on Appeal had been filed by their staff. On November 30, 2017, Petitioner was advised that documents relating to this appeal and a copy of Rule 416, SCACR, had been sent to the Richland County Court of Common Pleas nine (9) months after they were served with the Notice of Appeal on February 7, 2017. App.p. 117.

119-120. An email referenced by the Panel Report was inadvertently excluded from the Record on Appeal, but is attached hereto as an attachment.

A hearing on this appeal was convened in the Court of Common Pleas before the Honorable G. Thomas Cooper, presiding circuit court judge, on October 27, 2017.² At this hearing, Petitioner requested and was granted leave to incorporate the matter included in her Request for Reconsideration and/or Rehearing found in the Record on Appeal at pages 49-98. App. pp. 49-98. In addition to the matter found in that document, which was duly served on Respondent, by mail on August 2, 2017, as part of the Record on Appeal, Petitioner filed her Memorandum in Support of Appeal on December 20, 2107. *See*, App.pp. 163-198. That memorandum presented a somewhat abbreviated summary of the primary reasons the findings reflected in the Panel Report should be reversed, however as stated during the hearing on this appeal, Petitioner respectfully relied on the arguments addressed *in both* her Request for Reconsideration and/or Rehearing which the panel declined to review and her memorandum in Support of Appeal. Petitioner asserted that a reading of the Request for Reconsideration and/or Rehearing was crucial to an understanding the factual background for this fee dispute.

The following grounds for this appeal were submitted in the Notice of Appeal as required by Rule 20(c) (1) of SCACR 416.

1. The Panel erred in refusing to hear Petitioner's request for Reconsideration and/or Rehearing on the ground that the rules governing the Resolution of Fee Disputes Board do not expressly provide for such requests to be entertained, where the rules do not prohibit the hearing of such requests and where the absence of such a review deprives a party before the Board on review of a fee dispute any opportunity to bring

² In proofing the Appendix for this Certiorari Petition prepared by her paralegal, Petitioner discovered that it did not contain a transcript of the October 27, 2017. Counsel was certain she recalled having seen this transcript come into her firm, however she was unable to discover why it was not in the file materials in time to have it included in the Appendix. Petitioner apologizes for this oversight and will either find the missing record or order an expedited copy of this transcript from the Court Reporter at once and will submit it to the Court along with her Petition for Leave to file a Supplemental Appendix.

errors in the findings of the Panel to their attention without filing an appeal to the circuit court under the narrow framework of Rule 20.

2. The Panel exceeded its authority in ordering Petitioner to refund \$5,000.00 of her fee *to Respondent* where the Report and Recommendation issued by the Panel is predicated upon multiple erroneous factual findings in conflict with the evidence and testimony before the Panel and reasonable inferences drawn from the evidence and testimony before the Panel.

3. The Panel exceeded its authority in ordering Petitioner to refund \$5,000.00 of her fee *to Respondent* where he was not the party who paid Petitioner's fees and would not legally be entitled to such an award.

4. The Panel would not have had the authority to order Petitioner to refund \$5,000.00 of her fee *to the third party payer*, Respondent's mother, where she was not a proper party to this fee dispute inasmuch as she was not listed as an Applicant on the fee dispute and the fee dispute application *was not signed by both the client and the third-party payer* as required by the Board's own rules.

5. Petitioner would respectfully submit that the Fee Dispute Board's rule regarding appeals to the Circuit Court, would unconstitutionally infringe upon an attorney's right to due process of law unless the factors justifying vacation of a Board decision under Rule 20(f) are interpreted to include cases where the hearing Panel exceeds its authority by granting relief to an Applicant based upon findings of the Panel which are factually erroneous and/or unsupported by the evidence before the panel.

App. pp. 99-103.

All of the issues set forth above were addressed in detail in Petitioner's Memorandum in Support of Appeal and all her other pleadings prepared and served upon Respondent in the course of the Fee Dispute, Petitioner's Motion for Reconsideration (which the panel declined to even review), the Common Pleas Appeal, Petitioner's Rule 59(e), Motion to Alter and Amend, her Petition for Rehearing filed in the Court of Appeals and her Petition for Stay of Distribution of Fee Dispute Award.³

³ In the Index to the Appendix filed along with this Petition for Writ of Certiorari, the Order issued by the Court of Appeals, Judge Geathers acting on behalf of the Court, is referenced as the Order Dismissing Petitioner's Petition to Stay Disbursement filed May 24, 2018. That Order, found at App.p151, in fact dismissed Petitioner's Appeal of the

Petitioner's Appeal to the Richland County Court of Common Pleas was dismissed by Order of the Honorable G. Thomas Cooper, Jr., filed on March 9, 2018. That Order, found at App.pp. 125- 126, made no findings of fact or rulings of law with regard to the issues raised by Petitioner on appeal. Petitioner subsequently filed a Motion to Alter or Amend said Order pursuant to Rule 59(e), SCRPC, on March 20, 2018. App.pp. 128- 134. Petitioner's motion was denied by Order filed April 04, 2018, in which the Court once again made no effort to address the issues raised by Petitioner on appeal and made no specific findings with regard to Petitioner's arguments as presented in her Motion to Alter or Amend. App.pp. 135- 136. Petitioner subsequently filed her Notice of Appeal from both orders issued in this matter by way of her NOA served on Respondent on April 30, 2018 and sent to the South Carolina Court of Appeal for filing, along with a Certificate of service, that same date. Said NOA was filed in the Court of Appeals on May 2, 2018. See, App.pp. 137-139. On May 24, 2018, Petitioner filed a Petition for Order Staying Distribution of Fee Dispute Award. App.pp. 140-150. Within approximately two (2) hours of the filing of the Petition for Stay, the Court of Appeals, by way of an Order issued by the Honorable John D. Geathers on behalf of the Court, dismissed Petitioner's appeal and denied the request for an order staying distribution of the award directed by the Fee Dispute Panel in this matter. App.p.131. Petitioner filed her Petition for Rehearing and Request for Rehearing *en banc* on June 7, 2018. In said Petition, Petitioner noted the reasons why rehearing was necessary and why hearing *en banc* was appropriate. App.pp. 152 – 159. Rehearing was denied by Order filed September 10, 2018. App.p. 160. By Order of this Honorable Court dated November 2, 2018, Petitioner was granted leave to file this Certiorari Petition by today's date.

Order of the Court of Common Pleas and denied Petitioner's request for the Court's Order Staying Distribution of the Fee Dispute Award.

ARGUMENT

Questions I, III and V

In this case, the Court of Common Pleas simply did not make any findings of fact or rulings of law with regard to Petitioner's position that Rule 416, SCACR, Rule 20(f) should be interpreted to find that the fee dispute Board exceeds its authority where it grants relief to a party based upon material factual errors.

Issues 1, 2 and 5, Common Pleas appeal.

Petitioner exercised due diligence by filing an appropriate Motion to Alter or Amend pursuant to Rule 59(e) wherein Petitioner's pointed out the insufficiency of the Order issued in Petitioner's appeal to the Court of Common Pleas. The net effect of the actions of the Court of Common Pleas was to deny Petitioner the right to be heard on her positions. There is no authority that Petitioner has been able to find, which would support the idea that a fee dispute panel may make egregious errors in finding a factual basis for relief and the opposing party has no opportunity to be heard. The Fee Dispute Board asserts, without authority, that just because the rules governing them do not expressly provide for a party to ask for reconsideration, even in light of serious factual errors, they have the right to refuse to review such a petition. What is left without any discussion, is how the Fee Dispute Board can render fair and reliable finds if there is no safeguard to protect against serious errors made in a given case.

Petitioner rests upon the very detailed analysis of the many factual errors found in the Panel's Report. The panel never had the opportunity to acknowledge these errors and correct their findings accordingly, because they simply refused to even review the detailed analysis of their errors found in the Petition for Reconsideration served upon each of the panel members and the leadership of their Board to no avail.

Rule 416, SCACR, Rule 2, vests the Fee Dispute Board with the jurisdiction to decide fee disputes between a client and a lawyer. In the process, this rule strips the lawyer of his right to have our court system resolve contractual fee disputes. Petitioner most respectfully asserts that it is an affront to an attorney's right to due process of law that his right to litigate such disputes could be replaced with a system which, if the interpretation of the rules adopted by the Court of Common Pleas stands, leaves him with absolutely no recourse if an unfavorable decision is rooted in demonstrably erroneous factual findings.

In her Memorandum in Support of Appeal, Petitioner laid out with great specificity the numerous factual errors found in the Panel's report. She incorporates those arguments herein and asks this Honorable Court to review them for both accuracy and common sense. The panel decision in this matter is not only riddled with factually inaccurate findings, but it contradicts itself in several respects. See, App. pp. 163-198. Petitioner asserts that the Fee Dispute Board wrongfully denied her the opportunity to point out these serious errors to the panel and the entire Board. That error was then compounded when the Court of Appeals dismissed Petitioner's Appeal, on the order of a single judge, without any opportunity to be heard as to why her case could be readily distinguished from *Wright v. Dickey*, 370 S.C., 517, 636 S.E.2d 1 (Ct. App. 2006) and warranted reconsideration of the holding in that case. Likewise, Petitioner's efforts to highlight the problems with the actions of both the Court of Common Pleas and the Court of Appeals were ignored even on Petition for Rehearing. Petitioner most respectfully submits that this fee dispute, and the manner in which it was decided, should cause this Court grave concern. Petitioner has taken time away from her practice that is ultimately worth far more money than the award at issue in this case, because she believes in the seriousness of the issues involved in this matter.

Questions II and IV

Did the Fee Dispute Panel in this case, exceed its jurisdiction to order Petitioner to refund \$5,000.00 of her fee *to Respondent* where he was not the party who paid Petitioner's fees and would not legally be entitled to such an award?

Did the Fee Dispute Board lack jurisdiction to refund \$5,000.00 of her fee *to the third party payer*, Respondent's mother, where she was not a proper party to this fee dispute inasmuch as she was not listed as an Applicant on the fee dispute and the fee dispute application *was not signed by both the client and the third-party payer* as required by the Board's own rules?

Issues 3 and 4, Common Pleas Appeal

As noted by Petitioner in her circuit court appeal, the Fee Dispute Board has no authority to direct the *refund* of funds to Respondent which were not paid by him. Furthermore, under the rules governing the Fee Dispute Board the third party payer could have joined in Respondent's fee dispute application, with his express written consent, by being listed as a party to the application *and signing it*. As she did not comply with the rules, Katherine Hurst is not a party to this fee dispute. Rule 416, Resolution of Fee Disputes Board, SCACR, Rule 2, addresses the jurisdiction of the Fee Disputes Board. Under that provision, the Board has jurisdiction over a fee dispute between a client and an attorney who is a member of the South Carolina Bar. Rule 10, Rule 416, SCACR, states,

If the applicant is a client, but is not the person who paid for the lawyer's services, the third party payer, with the written consent of the client-applicant, may jointly file with the client-applicant, *with both signatures affixed to the application*. (Emphasis added).

Katherine Hurst *did not* comply with this rule and therefore, is not a party to this fee dispute. Therefore, the Fee Dispute Board does not have jurisdiction over her contract with Petitioner. Respondent's Fee Dispute Application acknowledges that he had no contract with Petitioner, either oral or written, and that Petitioner had contracted with a third party for payment. App.p. 6,

item 4. Said contract was entered between Petitioner and Katherine Virginia Hurst on March 19, 2015. App, pp. 15-17. Lawrence Hurst, husband to Katherine Hurst, was likewise not a party to the fee contract. In his Fee Dispute Contract, Respondent listed Katherine and Larry Hurst as persons designated “to act on [his] behalf regarding this dispute and to receive correspondence or notices for [him].” App, p. 9, Item 24. The Fee Dispute Application was signed by Respondent, John Daniel Springer only. App, p. 10, Item 4. Therefore, the panel did not have the authority to direct counsel to refund fees to Respondent, nor would they have the jurisdiction to direct a refund to the third party payer, his mother, where she was not a party to the Application. Furthermore, they clearly would not have the authority to refund a portion of Petitioner’s fees to Lawrence Hurst, who not only was not a party to the fee dispute, but was not a party to the contract between Katherine Hurst and Petitioner. This is particularly true where the Fee Dispute Board had already approved and adopted the Panel Report which directed an improper refund to Respondent, when it decided to refund the funds held in trust pursuant to the Panel’s findings to both Katherine and Lawrence Hurst. Rule 416, SCACR, gives the Fee Dispute Board jurisdiction over fee disputes between a client and a lawyer. That jurisdiction extends to a third party payer only when they comply with the rules for joining in a fee dispute with the consent of the Client. Regardless of whether the language found in Respondent’s fee agreement may be construed as his consent for Katherine and Lawrence Hurst to be party to his fee dispute, consent is not all that the rule requires. These individuals would have to have been listed as Applicants to this fee dispute, and would have to have each signed the Application, in order to become parties to this fee dispute. They did not and therefore, the Fee Dispute Board did not have jurisdiction to order an award be given to a non-party to the dispute before them.

Under the rules, the only remedy on appeal from a panel finding is a remand for a *de novo* hearing. Where, as here, the panel ordered a refund it did not have the authority to direct, the sole remedy is the remand of the fee dispute for a *de novo* hearing. Rule 20(g), Rule 416, SCACR,

While Petitioner sincerely hopes this case will prompt a review of holding in *Wright v. Dickey, supra*, and a change in the current interpretation of Rule 20, Rule 416, SCACR, which affords a party virtually no redress no matter how faulty the findings of the Fee Dispute Board, are the reality exists that the direction issued by the Fee Dispute Board in this case is jurisdictionally defective. Rule 416, SCACR, gives the Board authority over Fee Dispute Applicants and the members of the Bar against whom they are brought. It, as previously noted, contains strict rules for how and when a third party may join in such a fee dispute. Those rules were not complied with by the third party payer in the case, Katherine Hurst. Therefore, the Fee Dispute Board was without jurisdiction to order Petitioner to issue the refund directed by the panel to Respondent, nor did they have the jurisdiction to give those funds to Katherine and/Lawrence Hurst where neither of them had complied with the rules for joining in as a lawful party to this fee dispute.

Under the rules governing fee disputes, the funds placed in trust are to be disbursed once the ruling in this case becomes final. Rule 20 (d), Rule 416, SCACR. Petitioner, subsequent to the circuit court ruling and the filing of her Notice of Appeal, wrote the Fee Dispute Board and gave notice of her objection to the disbursement of these funds to Respondent, John Daniel Springer. Petitioner advised the Board that, in her professional opinion, the Bar did not have the jurisdiction to order her to refund money to Respondent that was not paid to her law firm by him. Petitioner advised the Bar, that in her professional opinion, the Bar could have liability issues

should they do so. Petitioner assumes the Bar has disbursed the funds she placed in trust with them in this matter. She has not been notified of such a disbursement. On May 16, 2018, Petitioner received correspondent from Lex A. Rogerson, Jr., Esquire, State Chair of the Resolution of Fee Disputes Board of the South Carolina Bar, advising Petitioner that unless she obtained a Court Order directing that disbursement be stayed in this matter by June 1, 2018, it was the intent of the Board to disburse the funds in question to Katherine Hurst and Lawrence Hurst. *See, App.pp 146-147.* Petitioner strenuously objected to the disbursement proposed in this correspondent for several reasons. They are as follows.

1. The panel decision directed a refund to Daniel Springer *not* his mother or her husband.
2. The panel report was reviewed and approved by the Board and the Board made no effort to correct this error, or any of the other errors, in the panel report.
3. The Board did not have the jurisdiction to modify or amend the panel findings *after* the Report was approved and adopted by the Board.
4. The Board does not have the authority to amend the directives contained in the report *after* the circuit court appeal is completed; thereby depriving Petitioner the opportunity to appeal their authority to make such a modification *after* the Board adopted and approved the Report as issued by the panel.
5. The panel did not have the jurisdiction at any point to direct a refund to Katherine Hurst as a third party payer, where Katherine Hurst did not comply with the express requirements of the rules for becoming a party to this dispute.
6. The Board next improperly modified the panel's directive as found in its Report by changing the party to receive the refunds, and issued the refund to Katherine Hurst and her husband, Lawrence Hurst. As previously noted, Petitioner's Fee Contract was between her law firm and with Katherine Hurst. App.pp. 15-17. There were three payments made on Petitioner's flat fee as provided by the contract entered with Katherine Hurst. Two wire payments were made to Petitioner's corporate account. Those payments were made in the amounts of \$2,500.00 and \$6,000.00. The paperwork lists the Debit Party for those transfers, as Lawrence Hurst or Katherine Hurst. App.pp. 13-14. The third payment was for \$7,500.00 and was paid by certified check from Katherine Hurst. APP., p. 12. Lawrence Hurst was not a party to Petitioner's fee contract and he, like Katherine Hurst, did not comply with the rules to become a party to this fee dispute. Rule 10, Rule 416, SCACR.

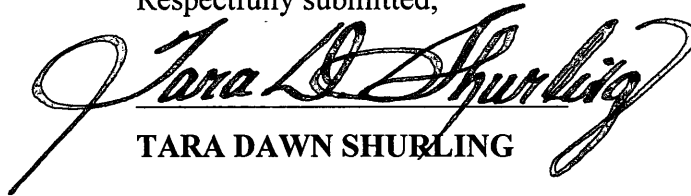
CONCLUSION

For all the above reasons, Petitioner most respectfully submits that the fee dispute panel did not have jurisdiction to direct Petitioner to issue a refund to Respondent. Rule 416, SCACR, Rule 2. Likewise, the Fee Dispute Board would not have had jurisdiction to order a refund to a third party payer, who was not a party to the Fee Dispute Application inasmuch as they had not complied with the requirements of Rule 10, Rule 416, SCACR, for joining in the Fee Dispute filed by Respondent. Here however, the time limits for Katherine and/or Lawrence Hurst to file a Fee dispute Application have run. Rule 416, SCACR, Rule 2. Therefore, the only appropriate remedy is the refund of the funds placed in trust by Petitioner to her.

The Fee Dispute Board clearly did not have jurisdiction to disburse the funds in trust with the South Carolina Bar to individuals who were not lawful parties to this Fee Dispute. The fact that Respondent designated his mother, Katherine Hurst and Lawrence Hurst as parties to act on his behalf regarding this dispute, and to receive correspondence or notices for him, did not make them parties to the fee dispute in this case. Likewise, Respondent listing Katherine Hurst and Larry Hurst as third party payers who would be due any actual refund does not comply with the requirements of the rules governing the Fee Dispute Board for these individuals to “jointly file with the client-applicant” and therefore, did not confer jurisdiction over the Fee Dispute Board to disburse the funds held in trust with the South Carolina Bar to a non-party to the Fee Dispute Application. The Fee Dispute Board did not have jurisdiction to add parties to this fee dispute at any point in the review of Respondent’s Application, and they certainly do not have jurisdiction to do so after the panel report was approved by the Board and an appeal has been finally decided by the Court of Common Pleas. For these reasons, Petitioner asks this Honorable Court’s Order finding that the Fee Dispute Board did not have the jurisdiction disburse the funds held in trust

pending Petitioner's appeal to the Circuit Court. She seeks this Honorable Court's Order directing that the funds in question be returned to Petitioner by the South Carolina Bar inasmuch as they are the party responsible for disbursing the funds in question to a party, or parties, they did not have jurisdiction to award them to. It bears noting that the appApp.ch taken by the Bar in this matter suggests the belief that they should be able to correct their own errors when they see fit and deny a party to a fee dispute any opportunity to have other errors in their findings be subject to review either in a Petition for Reconsideration or on appeal. In the alternative, she asks that the writ be issued in order that she might have the opportunity to more fully brief the issues summarized herein.

Respectfully submitted,



TARA DAWN SHUBLING

Attorney and Counselor at Law
S.C. Bar No. 5099

3614 Landmark Drive, Suite A
Columbia, South Carolina 29204
(803)738-8622
(803)738-1600 FAX

PETITIONER
Acting *pro se*

November 5th, 2018

STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

NOV 08 2018

Appellate Case No. 2018-001814

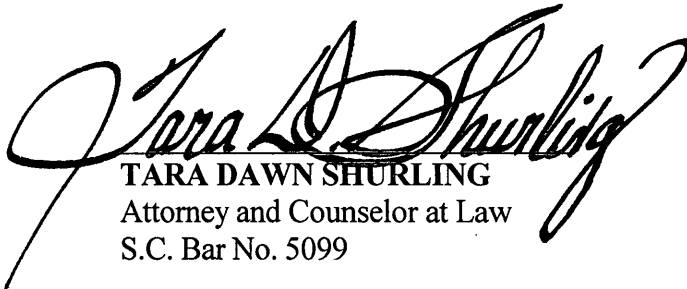
S.C. SUPREME COURT

Appeal From South Carolina
Court of Appeals
Appellate Case No. 2018-000823

TARA DAWN SHURLING, PETITIONER,
v.
JOHN DANIEL SPRINGER, RESPONDENT.

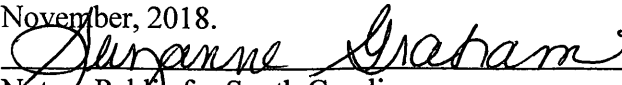
The undersigned attorney hereby certifies that one copy of the Petition for Writ of Certiorari and Appendix in the above-entitled cause has been served upon individual listed below by U. S. Certified Mail on this the 5th day of November, 2018 to:

John Daniel Springer, #294365
MacDougall Correctional Institution
B2C-0020-A
1516 Old Gilliard Road
Ridgeville, SC 29472


TARA DAWN SHURLING
Attorney and Counselor at Law
S.C. Bar No. 5099

3614 Landmark Drive, Suite A
Columbia, South Carolina 29204
(803)738-8622
(803)738-1600 FAX

Petitioner
Acting pro se

SWORN TO BEFORE ME this 5th day of
November, 2018.
 (L.S.)
Notary Public for South Carolina
My Commission Expires: 2/28/24