

**MOTION FOR DEFAULT JUDGMENT**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Case No. 2018-000741

Lamont Jeremiah McCauley,

Appellant,

v.

Paul Wickensimer, Greenville  
County Family Court Clerk's  
Office


Respondents.

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FEB 22 2019  
SC Court of Appeals

**MOTION FOR DEFAULT JUDGMENT**

The Appellant comes by special appearance to request a Motion for Default Judgment in the above Case No. 2018-000741. Pursuant to South Carolina Judicial Department Rule 211 (a) the Respondents had 20 days from January 2, 2019 to submit Final Briefs in accordance to the aforementioned rule. Respondent failure to comply with Judicial Rule 211, the Appellant is requesting a Default Judgment in pursuant to South Carolina Judicial Department's Rule 55. The Appellant seeks liquidated damages listed in the original filing of 1,150.00usd for compensatory damages, 115,000.00usd for punitive damages and an additional 10,800.00usd for attorney and filing fees.

February 19, 2019

  
Lamont Jeremiah McCauley  
504 Bethel Drive  
Mauldin, S.C. 29662  
(404)862-0179  
Appellant

THE STATE OF SOUTH CAROLINA  
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MCCAULEY,

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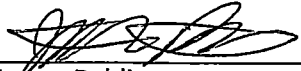
**AFFIDAVIT FOR AWARD OF ATTORNEY FEES**

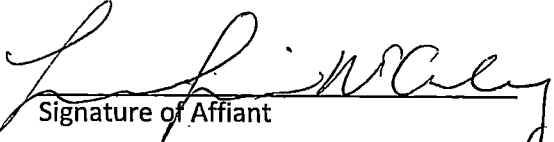
I, Lamont Jeremiah McCauley, the trustee and representative for the Appellant in the case no. 2018-000741 before your court, am submitting this affidavit for the award of legal fees associated with this matter.

1. A fictitious name filing with the County of Davidson in North Carolina, and the registration of a UCC filing with The State Secretary of North Carolina, I am the legal trustee and representative of the Appellant in matters of commerce. As such, I requesting the following fees be paid to me in association with the pleadings and defenses of case no. 2018-000741.
2. Under the fee arrangement with the Appellant, a fee of 180.00 per hour for a total of 61hrs. The services provided in the 61 hours as follows; preparing and filing affidavits=15hrs, pleadings=7hrs, motions=12hrs, and briefs= 27hrs for a total of 61hours.
3. After reviewing, the Appellant's time records and evaluating efforts necessary to conduct this two year litigation, the reasonable and appropriate award from this court would be no less than 10,980.00usd.

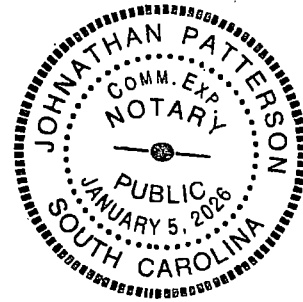
The above statements and all information and facts concerning this document are true to the best of my knowledge and belief.

Sworn before me on this 19 Day of February, 2019

  
\_\_\_\_\_  
Notary Public

  
\_\_\_\_\_  
Signature of Affiant

My Commission expires 1/5<sup>th</sup> of January, 2026.



**CERTIFICATION OF MAILING DEFAULT JUDGMENT**

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**CERTIFICATION OF MAILING**

I certify that I have served the Motion for Default Judgment on Paul Wickensimer, by depositing a copy of it in the United States Mail, postage prepaid, on February 20, 2019 addressed to his attorney of record, Russell W. Hater, Jr., 14 Lavinia Avenue, Greenville, South Carolina 29601.

February 20, 2019



Lamont Jeremiah  
McCauley  
504 Bethel Drive  
Mauldin, S.C. 29662  
(404)862-0179  
Appellant

Cc: *Cathy Huggins*

**CERTIFICATION OF AFFIDAVIT ATTORNEY FEES**

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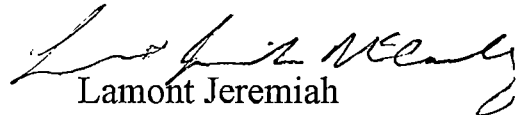
Paul Wickensimer, Greenville Family Court Clerk's Office,  
Respondents.

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February 20, 2019

  
Lamont Jeremiah  
McCauley  
504 Bethel Drive  
Mauldin, S.C. 29662  
(404)862-0179  
Appellant

Cc: Cathy Hugins

Lamont Jeremiah M. Carley  
c/o 504 Bethel Drive  
Mauldin S.C. 29662



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FEB 22 2018  
SC Court of Appeals

Jenny Abbott Kitching  
Clerk of Court  
1220 Senate Street  
Columbia SC 29201